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8 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
9 **IN AND FOR THE COUNTY OF KING**

10 ELIZABETH A. CAMPBELL, an individual,
11 Plaintiff,

12 vs.

13 LARS CHRISTIAN MATTHIESEN,
14 SHARON LUCAS, TOENE HAYES,
15 KRISTINE LEANDER, SARAH D.
16 ALAIMO, SWEDISH CULTURAL CENTER
17 d/b/a the SWEDISH CLUB, GARY SUND,
18 SHAMA ALBRIGHT, MOLLY OLSON
19 SMITH, MARY EMERSON, IB R.
20 ODDERSON, LANGDON L. MILLER, NEIL
21 SNYDER, KRIS E. JOHANSSON, MARTIN
22 K. JOHANSSON, ANNA FAINO and LANE
23 POWELL PC,

24 Defendants.

No. 23-2-25128-8 SEA

**PLAINTIFF ELIZABETH A.
CAMPBELL'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION
PROPOUNDED TO DEFENDANT
SARAH ALAIMO**

25 TO: Defendant Sarah Alaimo:

26 In accordance with Washington Superior Court Rules 26 and 33, please answer each of
27 the following interrogatories separately, fully, in writing and under oath. Each answer must be
28 as complete and straightforward as the information reasonably available to you permits after
reasonable inquiry, including the information possessed by your attorneys or agents. If an
interrogatory cannot be answered completely, answer it to the extent possible.

The answers are to be signed by the person to whom they are addressed and must be
served on all parties within thirty (30) days after the service of the interrogatories. NOTE:
Answers must be compliant with the Civil Rules, Local Rules, and Washington State case law,
including the duty set forth in CR 26(e) Supplemental Responses. Include all responsive
information available. For documents, produce in electronic format if possible, per CR

PLAINTIFF'S INTERROGATORIES
AND RFPS TO DEFENDANT Sarah Alaimo – 1

Elizabeth A. Campbell, MPA
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34(b)(2)(E). Objections must state specific grounds (CR 33(b)(4), 34(b)(2)(C)). If claiming privilege, provide Supplemental Responses. Include all responsive information available. For documents, produce in electronic format if possible, per CR 34(b)(2)(E). Objections must state specific grounds (CR 33(b)(4), 34(b)(2)(C)). If claiming privilege, provide a privilege log (CR 26(b)(5)).

DEFINITIONS

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

1. **“DATE” – Date/Time Period.** Unless a specific date or time period is expressly stated in an interrogatory, the time period covered by the interrogatory shall, by default, be from January 1, 2017, to the present date of April 16, 2025.

2. **“DOCUMENTS”** means all hard copy and electronic writings of every kind including, but not limited to, the original and any copy of all records, e-mails, letters, correspondence, appointment books, diaries, files, notes, statements, memoranda, or minutes of meetings, photographs, video, conferences, telephone calls, receipts, written reports or opinions of investigators or experts, status reports, financial statements, audit reports, tax returns, estimates, inventories, contracts, agreements, articles of incorporation, bylaws, stock book, minute book, deed, security agreement, mortgage, deed of trust, title or other insurance policy, report, record, study, hand written note, map, drawing, working paper, chart, paper, draft, index, tape, microfilm, data sheet, data processing card, computer printout, computer program, check, bank statement, passbook, including information recorded and stored electronically, however produced or reproduced, within your possession or subject to your control, of which you have knowledge or to which you have or have had access, or of which any of your agents, attorneys, accountants or consultants have had knowledge.

3. **“DEFENDANT GROUP(S)”** means the groups of defendants and the defense counsel(s) that represent them:

Group 1: Kristine Leander (former Executive Director) and Toene Hayes (former staff accountant), represented by Karen Kalzer.

Group 2: The Swedish Club, Langdon Miller (current board president), Kris Johansson (board member), Sharon Lucas (member/volunteer), and Gary Sund (former board president), represented by Brad Bigos and Alex Lopez.

Group 3: Elizabeth Norgren (former Executive Director), Sarah Alaimo (former HR Director), Shama Albright (former board president), Mary Emerson (former board secretary), Anna Faino (former board vice president), Martin Johansson (former membership chair), Ib Odderson (former board member), Molly Olson Smith (former board vice president), and Neil Snyder (former board member), represented by Megan Starks and Sarah Tatischeff.

Group 4: Lars Matthiesen (club member), represented by Nicholas Larson and Miguel Mendez-Pintado.

4. **“IDENTIFY”- Individuals.** When used in reference to an individual person, parties, participants, or third parties, means to state his or her name, including aliases or former names and **CONTACT INFORMATION** as defined below.

5. **“IDENTIFY”– Entity.** When used with reference to an entity, such as a partnership (either general or limited), joint venture, trust or corporation, to state the full legal name of such entity, each name under which such entity does business, the entity’s telephone number and the identity of the chief operating officer, manager, trustee, or other principal representative, and their **CONTACT INFORMATION** as defined below.

6. **“IDENTIFY”- Documents.** When used in reference to a document, means the date of preparation of the document, its author, the sender, the recipient, the nature of the document, e.g., letter, memo, tape, or other means of identification sufficient to identify the document, and its present location and custodian. Provide the name, address, and telephone number of the person with possession of the document.

7. **“IDENTIFY”- Claims/Lawsuits.** When used in reference to claims or lawsuits means the **CONTACT INFORMATION** of parties and attorneys representing the parties, proceeding number(s), jurisdiction, type of action, and disposition.

8. **“IDENTIFY” - Witness/Witnesses.** When used in reference to a witness or witnesses, "identify" means an individual who, by virtue of their presence, participation, or sensory perception (e.g., seeing, hearing, or otherwise experiencing), can provide testimony or information about a specific event, occurrence, or issue pertinent to the case. Additionally, the identification shall include a brief description of the specific event, occurrence, or issue to which the witness’s knowledge or testimony pertains. This includes providing their **CONTACT INFORMATION**, as defined below.

9. **“LETTER”** ☐ refers to the anonymous letter sent to and received by Plaintiff via the United States Postal Service on March 14, 2025”, stating:

a. “A concerned member wonders how the infamous Kristine Leander has so easily fallen off your radar. After all, she is the evil behind all of this.”

b. “How soon you seem to have forgotten her fake friendship? How quick you were to forgive the salacious gossip she spread about you around the club and among the members. One could never expect such quick forgiveness for one who acted as a true ‘mean girl’ towards you for the entirety of your relationship. Is it not her fault that you and Lars had such a clamorous and public argument at the Swedish club?”

c. “Is Kristine not the reason you no longer work there? How quickly you forget that Kristine is the reason you are no longer allowed to enter the club. This, among many other immoral things were all a part of her scheme from the beginning.”

1 d. "You" or "Your" refers to the Defendant to whom the interrogatory is directed, including
2 agents, employees, or representatives acting on their behalf.

3 e. "Signed,

4 f. "A concerned member who simply wonders how she so easily has gotten away with her
5 wrongs towards you."¹

6 10. "**PERSON**" includes a natural person, company, firm, association, organization,
7 partnership, business, trust, limited liability company, corporation, or public entity.

8 11. "**YOU**" or "**YOUR**" means the party to whom these interrogatories are addressed, your
9 attorneys, agents, employees, officers, representatives, adjusters, investigators, and any other
10 "person" who is in possession of information on your behalf.

11 12. "**CONTACT INFORMATION**" means full legal name, nickname(s), current physical
12 residential address, addresses for the past 10 years (residential if a person; business if a
13 company), dates at each address, e-mail address(es), and current phone numbers (work, mobile,
14 fax).

15 Dated this 16th Day of April, 2025

16 ELIZABETH A. CAMPBELL, MPA

17 

18 Elizabeth A. Campbell, MPA

19 Plaintiff Pro Se

20 3826 24th Ave W

21 Seattle, WA 98199

22 Tel/Text: 206-769-8459

23 Fax: 206-283-6300

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25
26
27
28

¹ Unknown. "Letter to Elizabeth Campbell." United States Postal Service. Postmarked March 6, 2025.

INTERROGATORIES

□ INTERROGATORY NO. 1.: Identity of the Letter’s Author: Do you have any knowledge of the identity of the person or entity who wrote or sent the Letter to Plaintiff? If yes, state the identity and describe how you obtained this knowledge; from July 1, 2024 to the present.

ANSWER:

□ INTERROGATORY NO. 2.: Involvement in the Letter: Did you, or anyone acting on your behalf, author, send, or contribute to the drafting or mailing of the Letter? If yes, provide details, including dates, methods, and reasons for your involvement or gaining knowledge of the preparation, transmission of it; from December 1, 2024 to the present.

ANSWER:

□ INTERROGATORY NO. 3.: Kristine Leander’s Role: The Letter states that “Kristine Leander is the evil behind all of this” and references a “scheme.” Describe any actions, statements, or plans by Kristine Leander, or by you or one of your fellow defendants, or any other person, that you are aware of relating to the termination of Plaintiff’s membership in the Swedish Club, and exclusion from the Swedish Club as a member, as a member of the public, including dates, reasons, and any notices provided to Plaintiff, or of the events described in the First Amended Complaint related to Plaintiff’s Swedish Club membership; from August 15, 2020 to present.

ANSWER:

□ INTERROGATORY NO. 4.: Alleged Gossip: The Letter claims Kristine Leander spread “salacious gossip” about Plaintiff “around the club and among the members.” Identify all instances you are aware of where Kristine Leander, you, or any other Defendant, member, or other person discussed Plaintiff with club members or staff, including dates, locations, identity of the participants, and the content of those discussions from August 15, 2020 to the present.

ANSWER:

□ INTERROGATORY NO. 5.: Public Argument with Lars Matthiesen: The Letter references a “clamorous and public argument” between Plaintiff and Defendant Lars Matthiesen

1 at the Swedish Club,² attributing it to Kristine Leander. State whether you have knowledge of
2 this incident, including the date, location, witnesses, and any role Kristine Leander played in
3 causing or escalating it; from January 1, 2021 to the present.

4 **ANSWER:**

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6 ☐ **INTERROGATORY NO. 6.: Employment Termination:** The Letter asserts that “Kristine
7 is the reason you no longer work there.” Describe all actions taken by Kristine Leander, you, or
8 other Defendants, Swedish Club employees or board members, or third parties, that contributed
9 to Plaintiff’s termination from employment at the Swedish Club, including the identity of any
10 person, dates, reasons provided, and any related communications August 1, 2020 to the present.

11 **ANSWER:**

12 ☐ **INTERROGATORY NO. 7.:Exclusion from the Club:** The Letter states that “Kristine is
13 the reason you are no longer allowed to enter the club.” Identify all decisions, policies, or
14 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
15 members, or third parties, that led to the termination of Plaintiff’s membership and exclusion
16 from the Swedish Club as a member, as a member of the public, including dates, reasons, and
17 any notices provided to Plaintiff; from September 1, 2020 to the present.

18 **ANSWER:**

19 ☐ **INTERROGATORY NO. 8.:Exclusion from the Club:** Identify all decisions, policies, or
20 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
21 members, or third parties, that led to the termination of any Swedish Club member’s
22 membership and exclusion from the Swedish Club as a member, as a member of the public,
23 including dates, reasons, and any notices provided to those members; from June 1, 2019 to the
24 present.

25 **ANSWER:**

26 ☐ **INTERROGATORY NO. 9.: Scheme Allegation:** The Letter claims Plaintiff’s termination
27 and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any
28 plans, agreements, or coordinated efforts by you or among Defendants or with third parties, to

² On December 17, 2021

1 terminate Plaintiff's employment or the termination of Plaintiff's membership, including
2 participants, timelines, and objectives; from August 15, 2020 to the present.

3 **ANSWER:**

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5 ☐ **INTERROGATORY NO. 10.: Witnesses:** Identify all individuals (by name, address, and
6 phone number, if known) who have knowledge of the events or statements referenced in the
7 Letter, including those related to Kristine Leander's actions toward Plaintiff; from August 15,
8 2020 to the present.

9 **ANSWER:**

10
11 ☐ **INTERROGATORY NO. 11.:** Identify all agreements, contracts, or arrangements between
12 You and the Swedish Club, the Swedish Club board of directors, Lane Powell PLLC, Priya
13 Vivian, Great American Insurance Company, or any other specified entity from July 1, 2022, to
14 the present.

15 **ANSWER:**

16 ☐ **INTERROGATORY NO. 12.:** Describe in detail Your role and responsibilities during
17 Your employment with the Swedish Club, including any investigative activities You undertook
18 on behalf of Great American Insurance Company, Priya Vivian, Lane Powell PLLC, Perkins
19 Coie, or the Swedish Club board of directors related to Kristine Leander, Elizabeth Campbell,
20 Toene Hayes, Anis Rahman, and any other employees, board members, or members of the
21 Swedish Club, or other HR or member related duties You engaged in; from October 1, 2022 to
22 November 30, 2024.

23 **ANSWER:**

24 ☐ **INTERROGATORY NO. 13.: Job Titles and Responsibilities:** Identify and describe in
25 detail your job titles, duties, and responsibilities at the Swedish Club during the period from
26 October 21, 2022, to the date of your termination, including any changes in your role or
27 responsibilities during that time.

28 **ANSWER:**

1 ☐ **INTERROGATORY NO. 14.: Circumstances of Your Termination:** Describe in detail
2 the circumstances surrounding your termination from the Swedish Club, including but not
3 limited to the date of termination, the reasons provided to you for your termination, and the
4 identity of the individual(s) who made the decision to terminate your employment.

5 **ANSWER:**

6 ☐ **INTERROGATORY NO. 15.: Legal Counsel Post-Termination:** Did you hire legal
7 counsel following your termination from the Swedish Club? If so, provide the name and contact
8 information of your legal counsel, and describe the nature of their involvement, including any
9 communications or negotiations with the Swedish Club on your behalf.

10 **ANSWER:**

11 ☐ **INTERROGATORY NO. 16.: Severance Agreement:** Was there any severance agreement
12 or settlement reached between you and the Swedish Club following your termination? If so,
13 describe the terms of that agreement, including any financial compensation, benefits, or other
14 considerations provided to you.

15 **ANSWER:**

16 ☐ **INTERROGATORY NO. 17.: Change in Defendant Status:** Explain why you are no
17 longer included in the group of defendants that previously included the Swedish Club.
18 Specifically, describe any agreements, settlements, or legal actions that led to this change.

19 **ANSWER:**

20 ☐ **INTERROGATORY NO. 18.: Joint Defense Agreement:** Are you currently part of a joint
21 defense agreement with any other defendants in this lawsuit? If so, identify all parties involved
22 in the joint defense agreement and describe the terms of that agreement.

23 **ANSWER:**

24 ☐ **INTERROGATORY NO. 19.: Interactions with Elizabeth Campbell:** Describe in detail
25 all interactions you had with Elizabeth Campbell regarding her employment and membership
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1 issues at the Swedish Club, including the dates, locations, and substance of each interaction, and
2 explain why you did not take action to address her concerns if no such action was taken.

3 **ANSWER:**

4
5 ☐ **INTERROGATORY NO. 20.: Decision Makers in Campbell's Termination:** Identify all
6 individuals who were involved in the decision to terminate Elizabeth Campbell's employment
7 and membership at the Swedish Club, and describe each person's role in that decision-making
8 process.

9 **ANSWER:**

10
11 ☐ **INTERROGATORY NO. 21.: Authorization of Termination Letter:** Specifically
12 regarding the termination letter you authored dated March 9, 2023, identify who authorized you
13 to write and send that letter, and describe any discussions or communications you had with
14 those individuals prior to sending the letter.

15 **ANSWER:**

16 ☐ **INTERROGATORY NO. 22.: Basis for November 2, 2022, Warning Claim:** In the
17 termination letter dated March 9, 2023, you referenced a prior warning given to Elizabeth
18 Campbell after the November 2, 2022, board meeting. Describe in detail the basis for this claim,
19 including any written documentation, memos, or communications that support this assertion.

20 **ANSWER:**

21
22 ☐ **INTERROGATORY NO. 23.: Communications with Shama Albright:** Describe all
23 communications you had with Shama Albright regarding Elizabeth Campbell, including the
24 dates, methods of communication (e.g., email, phone, in-person), and the substance of each
25 communication.

26 **ANSWER:**

27 ☐ **INTERROGATORY NO. 24.: Communications with Molly Olson Smith:** Describe all
28 communications you had with Molly Olson Smith regarding Elizabeth Campbell, including the
dates, methods of communication, and the substance of each communication, including any

1 discussions about placing Campbell on administrative leave or investigating the March 1, 2023,
2 board meeting incident.

3 **ANSWER:**

4
5 ☐ **INTERROGATORY NO. 25.: Communications with Elizabeth Norgren:** Describe all
6 communications you had with Elizabeth Norgren regarding Elizabeth Campbell, including the
7 dates, methods of communication, and the substance of each communication.

8 **ANSWER:**

9
10 ☐ **INTERROGATORY NO. 26.: Communications with the Swedish Club Board:** Describe
11 all communications you had with the Swedish Club Board of Directors or any individual board
12 member regarding Elizabeth Campbell, including the dates, methods of communication, and the
13 substance of each communication.

14 **ANSWER:**

15
16 ☐ **INTERROGATORY NO. 27.: Emotional Distress Allegations:** The complaint alleges
17 your actions caused Campbell emotional distress (§§ 1.5, 1.9). Identify any actions you took that
18 you believe could have affected Campbell's emotional well-being and explain why you believe
19 those actions were justified or appropriate.

20 **ANSWER:**

21 ☐ **INTERROGATORY NO. 28.: Financial Records and Incentives:** Identify and describe
22 any financial incentives, bonuses, or performance-based compensation you received during your
23 employment at the Swedish Club, including any incentives tied to personnel decisions, cost-
24 saving measures, or membership management.

25 **ANSWER:**

26
27 ☐ **INTERROGATORY NO. 29.: Witness Statements:** Identify all individuals who
28 witnessed or were present during any interactions between you and Elizabeth Campbell,
including but not limited to meetings, board sessions, or informal conversations, from

November 1, 2021, to the present. For each individual, provide their name, contact information, and a brief description of their role at the Swedish Club.

ANSWER:

☐ **INTERROGATORY NO. 30.: Communication with Legal Counsel:** Describe in detail all communications you had with any legal counsel representing the Swedish Club or any other defendant in this lawsuit regarding Elizabeth Campbell, including the dates, methods of communication, and the substance of each communication.

ANSWER:

REQUESTS FOR PRODUCTION

☐ **REQUEST FOR PRODUCTION NO. 1) Documents Related to the Letter:** All documents, communications, or drafts related to the creation, sending, or receipt of the Letter, including envelopes, notes, or correspondence discussing its contents or purpose; from December 1, 2024 to the present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 2) Communications by Kristine Leander:** All documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander that mention Plaintiff, Plaintiff's employment, or Plaintiff's membership at the Swedish Club from August 15, 2020 to the present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 3) Gossip Evidence:** All documents reflecting statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club employees or members, or third parties, as referenced in the Letter, including dates and recipients; from August 15, 2020 to the present.

RESPONSE:

1 ☐ **REQUEST FOR PRODUCTION NO. 4) Public Argument Records:** All documents,
2 reports, or communications held, received, or transmitted by You related to the “clamorous and
3 public argument” between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of
4 December 17, 2021, including witness statements, incident logs, or correspondence about the
5 incident; from December 17, 2021 to the present.

6 **RESPONSE:**

7 ☐ **REQUEST FOR PRODUCTION NO. 5) Employment Termination Records:** All
8 documents related to Plaintiff’s termination from employment at the Swedish Club, including
9 personnel files, performance reviews, disciplinary records, emails, meeting notes or
10 communications involving Kristine Leander or other Defendants, Swedish Club employees,
11 board members, or third parties; from March 1, 2021 to present.

12 **RESPONSE:**

13 ☐ **REQUEST FOR PRODUCTION NO. 6) Membership Exclusion Records:** All
14 documents related to Plaintiff’s exclusion from the Swedish Club as a member, including
15 membership records, board minutes, board directors’/executive directors’ emails between each
16 other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff’s
17 membership, or Kristine Leander, or communications involving Kristine Leander or other
18 Defendants, Swedish Club employees, board members, or third parties; from August 15, 2020
19 to the present.

20 **RESPONSE:**

21 ☐ **REQUEST FOR PRODUCTION NO. 7) Scheme Documentation:** All documents
22 evidencing any plan, agreement, or “scheme” by Kristine Leander or other Defendants to
23 terminate Plaintiff’s employment or revoke Plaintiff’s membership, as alleged in the Letter,
24 including internal communications or directives; from December 1, 2021 to the present.

25 **RESPONSE:**

26 ☐ **REQUEST FOR PRODUCTION NO. 8) Defendant Communications:** All
27 communications between Defendants from October 1, 2020 to the present discussing Plaintiff,
28 the Letter, or the claims in this lawsuit.

RESPONSE:

1 **□ REQUEST FOR PRODUCTION NO. 9.: Employment Documents:** Produce all
2 documents, including but not limited to emails, memos, notes, and correspondence, related to
3 your employment at the Swedish Club, including your job description, performance reviews, and
4 any disciplinary actions, from November 1, 2021, to the present.

5 **RESPONSE:**
6

7 **□ REQUEST FOR PRODUCTION NO. 10.: Termination Documents:** Produce all
8 documents related to your termination from the Swedish Club, including but not limited to
9 termination letters, severance agreements, and communications with legal counsel or the
10 Swedish Club, from the date of your termination to the present.

11 **RESPONSE:**
12

13 **□ REQUEST FOR PRODUCTION NO. 11.: Joint Defense Agreement Documents:**
14 Produce all documents related to any joint defense agreement you are part of with other
15 defendants in this lawsuit, from the date of the original complaint (December 19, 2023) to the
16 present.

17 **RESPONSE:**
18

19 **□ REQUEST FOR PRODUCTION NO. 12.: Communications with Campbell:** Produce all
20 documents, including emails, texts, and notes, of communications between you and Elizabeth
21 Campbell regarding her employment and membership at the Swedish Club, from November 1,
22 2021, to the present.

23 **RESPONSE:**
24

25 **□ REQUEST FOR PRODUCTION NO. 13.: Campbell Termination Documents:** Produce
26 all documents related to the decision to terminate Elizabeth Campbell's employment and
27 membership, including but not limited to meeting minutes, emails, and internal memos, from
28 January 1, 2023, to the present.

RESPONSE:

1 ☐ **REQUEST FOR PRODUCTION NO. 14.: Termination Letter Documents:** Produce the
2 termination letter you authored for Elizabeth Campbell dated March 9, 2023, along with any
3 drafts, notes, or communications related to its creation and authorization, from January 1, 2023,
4 to the present.

5 **RESPONSE:**

6 ☐ **REQUEST FOR PRODUCTION NO. 15.: November 2, 2022, Warning Documents:**
7 Produce all documents that support your claim in the termination letter that Elizabeth Campbell
8 was warned after the November 2, 2022, board meeting, including any written warnings, memos,
9 or communications with the Swedish Club's board or executive director, from November 2,
10 2022, to the present.

11 **RESPONSE:**

12 ☐ **REQUEST FOR PRODUCTION NO. 16.: Communications with Shama Albright:**
13 Produce all communications between you and Shama Albright regarding Elizabeth Campbell,
14 from November 1, 2022, to the present.

15 **RESPONSE:**

16 ☐ **REQUEST FOR PRODUCTION NO. 17.: Communications with Molly Olson Smith:**
17 Produce all communications between you and Molly Olson Smith regarding Elizabeth Campbell,
18 including any related to administrative leave or the March 1, 2023, investigation, from January 1,
19 2023, to the present.

20 **RESPONSE:**

21 ☐ **REQUEST FOR PRODUCTION NO. 18.: Communications with Kristine Leander:**
22 Produce all communications between you and Kristine Leander regarding Elizabeth Campbell,
23 from November 1, 2022, to the present.

24 **RESPONSE:**

1 **☐ REQUEST FOR PRODUCTION NO. 19.: Communications with Elizabeth Norgren:**

2 Produce all communications between you and Elizabeth Norgren regarding Elizabeth Campbell,
3 from January 1, 2023, to the present.

4 **RESPONSE:**

5
6 **☐ REQUEST FOR PRODUCTION NO. 20.: Communications with the Board:** Produce all
7 communications between you and the Swedish Club Board of Directors or any individual board
8 member regarding Elizabeth Campbell, from November 1, 2021, to the present.

9 **RESPONSE:**

10
11 **☐ REQUEST FOR PRODUCTION NO. 21.: Emotional Distress Documents:** Produce all
12 documents related to any actions you took that could have affected Elizabeth Campbell's
13 emotional well-being, including any internal reports, complaints, or communications discussing
14 her emotional state, from November 1, 2021, to the present.

15 **RESPONSE:**

16 **☐ REQUEST FOR PRODUCTION NO. 22.: Plans or Activities Documents:** Produce all
17 documents related to any plans or activities at the Swedish Club that involved Elizabeth
18 Campbell employment or membership there, including planning documents, participant lists, and
19 outcome reports, from November 1, 2021, to the present.

20 **RESPONSE:**

DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that:

- a) I am the Defendant in this action and am authorized to make the foregoing answers.
- b) I have made a reasonable inquiry of all available sources of information such that Plaintiff may rely on these answers as the truthful and complete answers made on behalf of this answering Defendant.
- c) I have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

DATED this ____ day of _____, 2025 at _____, Washington.

Name DEFENDANT - SARAH ALAIMO

CERTIFICATE OF SERVICE

I, Elizabeth A. Campbell, certify that on April 16, 2025 I caused to be served a true and correct Word and PDF copy of the foregoing INTERROGATORIES AND REQUEST FOR PRODUCTION TO DEFENDANT SARAH ALAIMO via the method indicated below and addressed to the following:

Brad Bigos, WSBA No. 52297
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☐ WA State App Courts' eFiling Portal

***Attorney for Defendant Swedish
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Attorney for Defs Hayes, Leander

I certify under penalty of perjury under the laws of the state of Washington that the foregoing
is true and correct.

DATED April 16, 2025, at Seattle, Washington.



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Plaintiff, Pro Se
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