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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  
SHAMA ALBRIGHT**

25 TO: Defendant Shama Albright:

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 Shama Albright – 1

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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."<sup>1</sup>

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 24<sup>th</sup> Ave W

21 Seattle, WA 98199

22 Tel/Text: 206-769-8459

23 Fax: 206-283-6300

24 neighborhoodwarrior@gmail.com

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<sup>1</sup> 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,<sup>12</sup> 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.: Scheme Allegation:** The Letter claims Plaintiff’s termination  
20 and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any  
21 plans, agreements, or coordinated efforts by you or among Defendants or with third parties, to  
22 terminate Plaintiff’s employment or the termination of Plaintiff’s membership, including  
23 participants, timelines, and objectives; from August 15, 2020 to the present.

24 **ANSWER:**

25 ☐ **INTERROGATORY NO. 9.:Exclusion from the Club:** Identify all decisions, policies, or  
26 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board  
27 members, or third parties, that led to the termination of any Swedish Club member’s  
28 membership and exclusion from the Swedish Club as a member, as a member of the public,

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<sup>2</sup> On December 17, 2021

1 including dates, reasons, and any notices provided to those members; from June 1, 2019 to the  
2 present.

3 **ANSWER:**

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

9 **ANSWER:**

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11 ☐ **INTERROGATORY NO. 11.: Resignation:** State the date you resigned from the Swedish  
12 Club Board of Directors and describe in detail all reasons for your resignation.

13 **ANSWER:**

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16 ☐ **INTERROGATORY NO. 12.: Resignation:** Describe the circumstances leading up to your  
17 resignation, including any interactions or communications with Kristine Leander, Sarah Alaimo,  
Molly Smith, Elizabeth Norgren, or other board members that influenced or informed your  
decision.

18 **ANSWER:**

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21 ☐ **INTERROGATORY NO. 13.: Resignation:** Identify all board meetings, discussions, or  
22 events between January 1, 2021, and your resignation date where issues related to Elizabeth  
Campbell's membership, employment, or treatment by the Swedish Club were discussed, and  
23 describe your role or statements made during those interactions.

24 **ANSWER:**

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27 ☐ **INTERROGATORY NO. 14.: Resignation:** Did you express concerns to any board  
28 member or Swedish Club staff about financial mismanagement, volunteer treatment, or  
employee harassment prior to your resignation? If so, provide details, including dates,  
recipients, and responses received.

1 **ANSWER:**

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4 ☐ **INTERROGATORY NO. 15.: Resignation:** Are you still a member of the Swedish Club,  
5 and if not provide details, including dates, communications with others, and responses received.  
6 **ANSWER:**

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8 ☐ **INTERROGATORY NO. 16.: Board Election Night Incident on April 20, 2022:**  
9 Describe in detail the events that occurred on April 20, 2022, during the election meeting at  
10 which you were elected President of the Swedish Club Board of Directors, specifically regarding  
11 Gary Sund's public denunciation of Elizabeth Campbell. Include what was said by Gary Sund,  
12 your observations of the incident, your reaction at the time, any discussions you had with other  
13 board members or attendees about it immediately afterward, and any actions you took in  
14 response as the newly elected president.

15 **ANSWER:**

16 ☐ **INTERROGATORY NO. 17.: Investigation by Perkins Coie:** Provide a comprehensive  
17 account of the investigation conducted by Perkins Coie into Elizabeth Campbell's employment  
18 concerns, over which you presided as board president. Include the reasons for initiating the  
19 investigation, the specific instructions you gave to Perkins Coie attorneys Shannon McDermott  
20 and Chelsea Petersen, the scope of their investigation, all findings and recommendations they  
21 reported to you or the board, any actions taken based on those findings, and an explanation for  
22 why the costs escalated from an estimated \$13,500–\$16,500 to over \$78,000 under your  
23 oversight.

24 **ANSWER:**

25 ☐ **INTERROGATORY NO. 18.: Hiring of Lane Powell and Sarah Alaimo:** Explain in  
26 detail the process and reasoning behind your coordination with Great American Insurance  
27 Company to hire Lane Powell, and the subsequent appointment of Sarah Alaimo as the Swedish  
28 Club's HR Director. Include all communications you had with Great American and Lane Powell,  
the specific duties you assigned to Sarah Alaimo, your assessment of her role in relation to  
Elizabeth Campbell's employment and membership, and whether you directed or approved any  
actions by Alaimo that Campbell alleges were espionage or retaliatory in nature.

**ANSWER:**



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3 **□ INTERROGATORY NO. 19.: Transition from Kristine Leander to Elizabeth Norgren:**  
4 Detail the circumstances surrounding Kristine Leander's departure from her role as Executive  
5 Director of the Swedish Club. Was she forced out by the board of directors under your  
6 leadership, or did she retire voluntarily? Provide all reasons for her departure, any discussions or  
7 votes by the board regarding her exit, and the full process you oversaw for selecting and hiring  
8 Elizabeth Norgren as the new executive director, including the criteria used and any input you  
9 received about Norgren's approach to Campbell's employment and membership.

10 **ANSWER:**

11 **□ INTERROGATORY NO. 20.: Events on March 1, 2023:** Recount in detail the events of  
12 the in-person board meeting on March 1, 2023, over which you presided as president,  
13 particularly focusing on Sharon Lucas's alleged inappropriate behavior toward Elizabeth  
14 Campbell. What did you observe about Lucas's actions, Campbell's behavior, and the  
15 interactions between them? Describe your response to the incident, any discussions you had with  
16 other board members about it, and whether you took any steps to address Lucas's conduct or  
17 Campbell's treatment that evening.

18 **ANSWER:**

19 **□ INTERROGATORY NO. 21.: Executive Sessions and Discussions:** Provide a detailed  
20 account of all executive sessions and board discussions you participated in as president regarding  
21 Elizabeth Campbell from April 20, 2022, through December 31, 2023. Include the dates and  
22 locations of these meetings, the attendees, the specific topics discussed about Campbell (such as  
23 placing her on leave, investigating her, terminating her employment, or restricting her  
24 membership), the decisions made, the rationales provided, and any dissenting opinions expressed  
25 by board members.

26 **ANSWER:**

27 **□ INTERROGATORY NO. 22.: Communications with Elizabeth Campbell:** List and  
28 describe in full detail all communications you had with Elizabeth Campbell, both as a member  
and an employee, from April 20, 2022, through December 31, 2023, regarding her complaints  
and notices to the board. Include the dates, methods (e.g., email, phone, in-person), the content  
of each communication, the specific complaints she raised, your responses to her, and any  
actions you took or directed as president in response to her concerns.

**ANSWER:**

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4                                    **REQUESTS FOR PRODUCTION**

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

9                    **RESPONSE:**

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

14                    **RESPONSE:**

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

20                    **RESPONSE:**

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

26                    **RESPONSE:**

27   ☐ **REQUEST FOR PRODUCTION NO. 5) Employment Termination Records:** All  
28 documents related to Plaintiff's termination from employment at the Swedish Club, including  
personnel files, performance reviews, disciplinary records, emails, meeting notes or

1 communications involving Kristine Leander or other Defendants, Swedish Club employees,  
2 board members, or third parties; from March 1, 2021 to present.

3 **RESPONSE:**

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

12 **RESPONSE:**

13 ☐ **REQUEST FOR PRODUCTION NO. 7) Scheme Documentation:** All documents  
14 evidencing any plan, agreement, or "scheme" by Kristine Leander or other Defendants to  
15 terminate Plaintiff's employment or revoke Plaintiff's membership, as alleged in the Letter,  
16 including internal communications or directives; from December 1, 2021 to the present.

17 **RESPONSE:**

18 ☐ **REQUEST FOR PRODUCTION NO. 8) Defendant Communications:** Produce all  
19 emails, text messages, letters, or other written communications sent or received by you between  
20 January 1, 2021, and the present relating to your resignation from the Swedish Club Board of  
21 Directors.

22 **RESPONSE:**

23  
24 ☐ **REQUEST FOR PRODUCTION NO. 9) Defendant Resignation:** Produce a copy of  
25 your resignation letter or any written notice of resignation submitted to the Swedish Club,  
26 including any drafts thereof.

27 **RESPONSE:**

1 ☐ **REQUEST FOR PRODUCTION NO. 10) Defendant Resignation:** Produce all  
2 responses, whether written or electronic, you received from board members, Swedish Club staff,  
3 or members regarding your resignation.

4 **RESPONSE:**

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6 ☐ **REQUEST FOR PRODUCTION NO. 11) Defendant Resignation:** Produce all  
7 communications between you and Sarah Alaimo from October 1, 2022, to the present  
8 concerning the Swedish Club, its board, or your resignation.

9 **RESPONSE:**

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11 ☐ **REQUEST FOR PRODUCTION NO. 12) Defendant Resignation:** Produce any notes,  
12 documents, communications that you identified in Interrogatory No. 15 above.

13 **RESPONSE:**

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16 ☐ **REQUEST FOR PRODUCTION NO. 13) Defendant Resignation:** Produce any notes,  
17 minutes, or records from board meetings you attended where Elizabeth Campbell's membership  
18 or employment was discussed, including any related correspondence.

19 **RESPONSE:**

20  
21 ☐ **REQUEST FOR PRODUCTION NO. 14.: The Denunciation Incident on April 20,**  
22 **2022:** Produce all documents, including but not limited to meeting minutes, notes, emails, text  
23 messages, and recordings, related to the election meeting on April 20, 2022, at which you were  
24 elected president, specifically concerning Gary Sund's denunciation of Elizabeth Campbell.  
25 Include any correspondence you sent or received about this incident within 30 days following the  
26 event.

27 **RESPONSE:**

28 ☐ **REQUEST FOR PRODUCTION NO. 15.: Investigation by Perkins Coie:** Produce all  
documents related to the investigation conducted by Perkins Coie under your oversight,

PLAINTIFF'S INTERROGATORIES  
AND RFPS TO DEFENDANT Shama Albright – 12

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1 including the engagement letter, all correspondence with Shannon McDermott and Chelsea  
2 Petersen, investigation reports, billing records, findings, recommendations, and any  
3 communications with other board members or third parties about the investigation's progress,  
4 costs, or outcomes.

5 **RESPONSE:**

6 **☐ REQUEST FOR PRODUCTION NO. 16.: Hiring of Lane Powell and Sarah Alaimo.**

7 Produce all documents related to your coordination with Great American Insurance Company to  
8 hire Lane Powell and the appointment of Sarah Alaimo as HR Director, including contracts,  
9 emails, text messages, memoranda, and communications with Lane Powell, Great American, or  
10 Alaimo regarding her role, duties, or interactions with Elizabeth Campbell.

11 **RESPONSE:**

12 **☐ REQUEST FOR PRODUCTION NO. 17.: Transition from Kristine Leander to**

13 **Elizabeth Norgren:** Produce all documents related to Kristine Leander's departure and the  
14 hiring of Elizabeth Norgren as Executive Director under your presidency, including resignation  
15 letters, retirement announcements, board meeting minutes, emails, selection committee notes, job  
16 postings, candidate evaluations, and any correspondence discussing the reasons for Leander's  
17 exit or Norgren's appointment.

18 **RESPONSE:**

19 **☐ REQUEST FOR PRODUCTION NO. 18.: Events on March 1, 2023:** Produce all  
20 documents related to the in-person board meeting on March 1, 2023, including agendas, minutes,  
21 notes, emails, incident reports, witness statements, and any communications among board  
22 members or with Sharon Lucas about her alleged behavior toward Elizabeth Campbell that  
23 evening.

24 **RESPONSE:**

25 **☐ REQUEST FOR PRODUCTION NO. 19.: Executive Sessions and Discussions:** Produce  
26 all documents from executive sessions and board discussions regarding Elizabeth Campbell from  
27 April 20, 2022, through December 31, 2023, over which you presided, including agendas,  
28 minutes, handwritten notes, emails, resolutions, and any records of decisions to place Campbell  
on leave, investigate her, terminate her employment, or restrict her membership.

**RESPONSE:**

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3 **□ REQUEST FOR PRODUCTION NO. 20.: Communications with Elizabeth Campbell:**  
4 Produce all communications between you and Elizabeth Campbell from April 20, 2022, through  
5 December 31, 2023, including emails, letters, text messages, notes from meetings or phone calls,  
6 and any responses you drafted or sent addressing her complaints as a member or employee.

7 **RESPONSE:**  
8

9 **DECLARATION OF RESPONDING PARTY**

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

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

17 DATED this \_\_\_\_ day of \_\_\_\_\_, 2025 at \_\_\_\_\_, Washington.  
18

19 \_\_\_\_\_  
20 Name DEFENDANT - SHAMA ALBRIGHT  
21  
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23  
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26  
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**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 SHAMA ALBRIGHT via the method indicated below and addressed to the following:

Brad Bigos, WSBA No. 52297  
Alexandro Lopez, WSBA No. 62867  
O'HAGAN MEYER, PLLC  
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☐ KC E-File Service  
☒ Email  
☐ Legal Messenger  
☐ U.S. Mail  
☐ WA State App Courts' eFiling Portal

***Attorney for Defendant Swedish  
Cultural Center d/b/a the Swedish Club,  
K. Johansson, Lucas, Miller, and Sund***

Megan F. Starks, WSBA No. 39640  
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☐ WA State App Courts' eFiling Portal

***Attorney for Defendant Alaimo, Albright,  
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☒ Email  
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☐ U.S. Mail  
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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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