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

ELIZABETH A. CAMPBELL, an individual,
Plaintiff,

vs.

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

Defendants.

NO. 23-2-25128-8 SEA

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

TO: Defendant Sharon Lucas:

In accordance with Washington Superior Court Rules 26 and 33, please answer each of the following interrogatories separately, fully, in writing and under oath. Each answer must be 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,

PLAINTIFF'S INTERROGATORIES AND
RFPS TO DEFENDANT SHARON LUCAS – 1

Elizabeth A. Campbell, MPA
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Seattle, WA 98199
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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 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

24 neighborhoodwarrior@gmail.com

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:**

5
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:**

4
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.: Role and Involvement at the Swedish Club:** Describe your
12 role(s) and responsibilities at the Swedish Club from August 15, 2020, to the present, including
13 any positions held (e.g., board member, committee member, volunteer, employee), your
14 interactions with Kristine Leander, Sarah Alaimo, Elizabeth Norgren, and the Swedish Club
15 Board of Directors, and whether you were paid, reimbursed expenses, or otherwise
16 compensated for any of these duties (including amounts and dates of payments or
17 reimbursements).

18 **ANSWER:**

19 ☐ **INTERROGATORY NO. 12.: Relationship with the Swedish Club Board of Directors:**
20 Describe your formal and informal relationship with the Swedish Club's Board of Directors
21 from January 1, 2021, to the present, including whether you provided training in board
22 management or best practices, the nature and frequency of such training, and any compensation
23 or expense reimbursements received for these services (including amounts and dates).

24 **ANSWER:**

25 ☐ **INTERROGATORY NO. 13.: Interactions with Plaintiff:** Describe all interactions you
26 had with Plaintiff Elizabeth Campbell from August 15, 2020, to the present, including any
27 communications (in-person, written, or electronic) and the context, purpose, and content of
28 those interactions, with specific detail about any physical contact or verbal exchanges.

ANSWER:

1 **□ INTERROGATORY NO. 14.: March 1, 2023 Incident:** Describe in detail your actions
2 and statements during the incident on March 1, 2023, at the Swedish Club board meeting,
3 including whether you made physical contact with Ms. Campbell (e.g., putting your body
4 against hers and pushing her backwards), your verbal statements to or about her, your intent,
5 and the circumstances leading to this interaction.

6 **ANSWER:**

7
8 **□ INTERROGATORY NO. 15.: Statements About March 1, 2023 Incident:** Identify all
9 individuals (including their names and contact information) to whom you provided any
10 statement to about the March 1, 2023 incident, the content of those statements, the dates they
11 were made, and whether you were reprimanded, congratulated, or promoted as a result
(including by whom and when, the method of communication those responses were delivered to
or exchanged with you).

12 **ANSWER:**

13
14 **□ INTERROGATORY NO. 16.: Membership Aggression Allegations:** The complaint
15 alleges you supported Kristine Leander's campaign of aggression against Elizabeth Campbell's
16 Swedish Club membership rights in August 2021. Describe any actions you took or statements
17 you made related to Ms. Campbell's membership, including attendance at board meetings,
seating arrangements, or communications with other club members or staff about Ms.
Campbell.

18 **ANSWER:**

19
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21 **□ INTERROGATORY NO. 17.: Hostile Environment:** The complaint alleges you
22 contributed to a hostile environment for Ms. Campbell. Identify any actions you took or
23 observed that could have been perceived as hostile toward Ms. Campbell, including but not
24 limited to board meeting conduct, communications with other defendants, or club policies you
enforced.

25 **ANSWER:**

26
27 **□ INTERROGATORY NO. 18.: Bylaw Manipulation:** An email included as Exhibit P-7
28 (Page 467) alleges you made up bylaws "on the spot" during the Swedish Club's election
process. Describe your involvement in the club's election processes from January 1, 2021, to

1 the present, including any changes to bylaws, nomination procedures, or board candidate
2 selections, and provide the factual basis for any statements or actions attributed to you in this
3 regard.

4 **ANSWER:**

5
6 **☐ INTERROGATORY NO. 19.: Behavior at Other Locations:** Describe any incidents from
7 January 1, 2015, to the present at your place of employment or membership, including but not
8 limited to at the Nordic National Museum (formerly Nordic Heritage Museum), the Leif
9 Erikson Hall, the Swedish Club, or other places you frequent where you have been accused of
10 assaulting, pushing, hitting, verbally abusing, or acting aggressive towards individuals,
11 including the dates, locations, individuals involved, and outcomes (e.g., reprimands,
12 complaints).

13 **ANSWER:**

14 **☐ INTERROGATORY NO. 20.: Disciplinary History:** Identify any instances from January
15 1, 2015, to the present where you were reprimanded, disciplined, or investigated for assault,
16 verbal abuse, defamation, or other behavioral issues at your place of employment, the Swedish
17 Club, or other organizations, including the dates, entities involved, and outcomes.

18 **ANSWER:**

19 **☐ INTERROGATORY NO. 21.: Mental Health and Behavioral Treatment:** State whether
20 you have received psychiatric treatment, attended anger management classes, or undergone
21 other behavioral health evaluations or treatment for mental health conditions from January 1,
22 2015, to the present, including the dates, providers, and reasons for such treatment (without
23 disclosing privileged medical details unless ordered by the court).

24 **ANSWER:**

25 **☐ INTERROGATORY NO. 22.: Communications About Kristine Leander:** Describe all
26 communications you had with any defendant, Swedish Club board member, members, or
27 employee about Kristine Leander's management of the Swedish Club, her personal attitude,
28 behavior, or reasons for her retirement between January 1, 2021, and December 31, 2023,
including the date, medium, and content of each communication.

ANSWER:

1
2
3 **□ INTERROGATORY NO. 23.: Communications About Sarah Alaimo:** Describe all
4 communications you had with any defendant or Swedish Club executive director, board
5 member, member, or employee about Sarah Alaimo’s hiring, the purpose of her hiring, her job
6 performance, duties, or reasons for her termination between October 1, 2022, and November 30,
7 2024, including the date, medium, and content of each communication.

8 **ANSWER:**

9 **□ INTERROGATORY NO. 24.: Communications About Elizabeth Norgren:** Describe all
10 communications you had with any defendant or Swedish Club board member, members, or
11 employee about Elizabeth Norgren’s management of the Swedish Club, her personal attitude,
12 behavior, or reasons for her termination between February 1, 2023, and November 30, 2024,
13 including the date, medium, and content of each communication.

14 **ANSWER:**

15 **□ INTERROGATORY NO. 25.: Communications About Elizabeth Campbell:** Describe all
16 communications you had with any defendant or Swedish Club board member, member, or
17 employee about Elizabeth Campbell’s job performance, relationships as a member or employee,
18 reasons for her termination, or termination of her membership between August 15, 2020, and
19 the present, including the date, medium, and content of each communication.

20 **ANSWER:**

21 **□ INTERROGATORY NO. 26.: Communications About This Lawsuit:** Describe all
22 communications you had with any defendant or Swedish Club board member, member, or
23 employee about the events leading up to this lawsuit and about the lawsuit (Case No. 23-2-
24 25195-4 SEA) from January 1, 2023, to the present, including the date, medium, content, and
25 whether these discussions involved a joint defense agreement.

26 **ANSWER:**

27 **□ INTERROGATORY NO. 27.: Knowledge of Harassment:** Identify any complaints,
28 concerns, communications, or observations you received or made about harassment,
discrimination, or retaliation against Ms. Campbell or any other Swedish Club members or

employees from August 15, 2020, to the present, including the individuals involved and your response to such information.

ANSWER:

☐ **INTERROGATORY NO. 28.: Knowledge of Harassment:** Identify any complaints, concerns, communications, or observations you made for or against Ms. Campbell to any other Swedish Club members or employees from August 15, 2020, to the present, including the individuals involved and their response to your communications.

ANSWER:

☐ **INTERROGATORY NO. 29.: Board Meeting Conduct:** Describe your participation in Swedish Club board meetings held on June 3, 2022, November 2, 2022, and March 1, 2023, including any actions you took related to guest attendance, seating arrangements, meal provisions, or interactions with Ms. Campbell or other non-board members.

ANSWER:

☐ **INTERROGATORY NO. 30.: Emotional Distress Allegations:** The complaint alleges your actions caused Ms. Campbell emotional distress. Identify any actions you took that you believe could have affected Ms. Campbell's emotional well-being and explain why you believe those actions were justified or appropriate.

ANSWER:

☐ **INTERROGATORY NO. 31.: Joint Defense Agreements:** State whether you have entered into any joint defense agreement or shared legal strategy with any other defendant in this lawsuit, and if so, describe the terms, participants, and dates of such agreements.

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,

PLAINTIFF'S INTERROGATORIES AND
RFPS TO DEFENDANT SHARON LUCAS – 11

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1 including envelopes, notes, or correspondence discussing its contents or purpose; from
2 December 1, 2024 to the present.

3 **RESPONSE:**

4
5 ☐ **REQUEST FOR PRODUCTION NO. - 2) Communications by Kristine Leander:** All
6 documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander
7 that mention Plaintiff, Plaintiff's employment, or Plaintiff's membership at the Swedish Club
8 from August 15, 2020 to the present.

9 **RESPONSE:**

10
11 ☐ **REQUEST FOR PRODUCTION NO. - 3) Gossip Evidence:** All documents reflecting
12 statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club
13 employees or members, or third parties, as referenced in the Letter, including dates and
14 recipients; from August 15, 2020 to the present.

15 **RESPONSE:**

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

21 **RESPONSE:**

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

27 **RESPONSE:**

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

8 **RESPONSE:**

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

13 **RESPONSE:**

14 **□ REQUEST FOR PRODUCTION NO. 8) Defendant Communications:** All
15 communications between Defendants from October 1, 2020 to the present discussing Plaintiff,
16 the matters discussed in the Letter, or the claims in this lawsuit.

17 **RESPONSE:**

18
19 **□ REQUEST FOR PRODUCTION NO. 9.: Communications with Plaintiff:** Produce all
20 documents, including emails, text messages, letters, or notes, reflecting communications
21 between you and Plaintiff Elizabeth Campbell from August 15, 2020, to the present, with
22 specific emphasis on any related to the March 1, 2023 incident.

23 **RESPONSE:**

24
25 **□ REQUEST FOR PRODUCTION NO. 10.: Communications with Other Defendants:**
26 Produce all documents, including emails, text messages, letters, or notes, reflecting
27 communications between you and defendants Kristine Leander, Elizabeth Norgren, Toene
28 Hayes, Molly Olson, Shama Albright, Sarah Alaimo, or any Swedish Club board members,
members, or employees from August 15, 2020, to the present regarding Ms. Campbell, this
lawsuit, Leander, Alaimo, or Norgren as specified in Interrogatories 22–26.

RESPONSE:

1
2
3
4 **□ REQUEST FOR PRODUCTION NO. 11.: March 1, 2023 Incident Records:** Produce all
5 documents related to the March 1, 2023 Swedish Club board meeting, including agendas,
6 minutes, attendance records, seating plans, meal arrangements, communications about the
incident (e.g., your statements to others), and any reprimands, congratulations, or promotions
you received as a result.

7 **RESPONSE:**
8
9

10 **□ REQUEST FOR PRODUCTION NO. 12.: Board Meeting Records:** Produce all
11 documents related to Swedish Club board meetings held on June 3, 2022, November 2, 2022,
12 and March 1, 2023, including agendas, minutes, attendance records, seating plans, meal
arrangements, and any communications about guest attendance or Ms. Campbell's participation.

13 **RESPONSE:**
14

15 **□ REQUEST FOR PRODUCTION NO. 13.: Election and Bylaw Documents:** Produce all
16 documents related to Swedish Club elections from January 1, 2021, to the present, including
17 bylaws, amendments, nomination committee records, candidate lists, and communications about
election procedures or about Ms. Campbell's candidacy in late 2021 to April 2022, or about
18 Charles Willi's candidacy, as referenced in Exhibit P-7 (Page 467).

19 **RESPONSE:**
20

21 **□ REQUEST FOR PRODUCTION NO. 14.: Compensation Records:** Produce all
22 documents reflecting payments, reimbursements, or compensation you received from the
23 Swedish Club for any duties, including board training or management services, from January 1,
2021, to the present, including dates, amounts, and purposes.

24 **RESPONSE:**
25
26

27 **□ REQUEST FOR PRODUCTION NO. 15.: Behavioral Incidents:** Produce all documents
28 reflecting complaints, reprimands, investigations, or disciplinary actions against you for the
assault, pushing, aggressively touching, hitting, verbal abuse, or defamation of others, fellow
employees, fellow members, or third parties at your place of employment, the Nordic National

1 Museum, Leif Erikson Hall, the Swedish Club, or at any other locations from January 1, 2010,
2 to the present, including correspondence and outcomes.

3 **RESPONSE:**

4
5 **□ REQUEST FOR PRODUCTION NO. 16.: Mental Health and Behavioral Treatment**

6 **Records:** Produce all non-privileged documents (e.g., attendance certificates, correspondence)
7 reflecting your participation in psychiatric treatment, anger management classes, or other
8 behavioral health evaluations or treatment from January 1, 2020, to the present, excluding
privileged medical records unless ordered by the court.

9 **RESPONSE:**

10
11 **□ REQUEST FOR PRODUCTION NO. 17.: Club Policies and Procedures:** Produce all
12 Swedish Club policies, handbooks, or guidelines in effect from August 15, 2020, to the present
13 related to membership rights, board meeting access, guest attendance, volunteer activities,
14 harassment/discrimination, or board training, including any drafts or revisions you reviewed or
contributed to.

15 **RESPONSE:**

16
17 **□ REQUEST FOR PRODUCTION NO. 18.: Complaints and Investigations:** Produce all
18 documents reflecting complaints, concerns, or investigations related to harassment,
19 discrimination, or retaliation at the Swedish Club from August 15, 2020, to the present,
20 including those involving Ms. Campbell or other members/employees, and your role in
addressing or responding to such complaints.

21 **RESPONSE:**

22
23 **□ REQUEST FOR PRODUCTION NO. 19.: Personal Notes and Diaries:** Produce any
24 personal notes, diaries, or journals you maintained from August 15, 2020, to the present that
25 reference Ms. Campbell, the March 1, 2023 incident, the Swedish Club's operations, board
26 meetings, elections, or interactions with other defendants or board members.

27 **RESPONSE:**

1 **□ REQUEST FOR PRODUCTION NO. 20.: Financial and Membership Records:** Produce
2 any documents in your possession related to Ms. Campbell's membership status, dues, or
3 restrictions at the Swedish Club from August 15, 2020, to the present, including correspondence
or records of actions taken to limit her membership rights.

4 **RESPONSE:**

5
6 **□ REQUEST FOR PRODUCTION NO. 21.: Social Media and Public Statements:** Produce
7 any social media posts, comments, or public statements you made from August 15, 2020, to the
8 present regarding Ms. Campbell, the March 1, 2023 incident, the Swedish Club, or the events
described in the complaint, including screenshots or archived versions.

9 **RESPONSE:**

10
11
12 **□ REQUEST FOR PRODUCTION NO. 22.: Joint Defense Agreements:** Produce all non-
13 privileged documents reflecting any joint defense agreements, shared legal strategies, or
14 communications with other defendants or their counsel regarding this lawsuit from January 1,
2023, to the present.

15 **RESPONSE:**

16
17
18 **□ REQUEST FOR PRODUCTION NO. 23.: Training Materials:** Produce all documents
19 related to training or guidance you provided to the Swedish Club's Board of Directors on board
20 management or best practices from January 1, 2021, to the present, including presentations,
handouts, or correspondence about such training.

21 **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 - SHARON LUCAS

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 SHARON LUCAS via the method indicated below and addressed to the following:

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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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