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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
SWEDISH CLUB**

25 TO: Defendant Swedish Club:

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 SWEDISH CLUB – 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."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

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

1 **INTERROGATORIES**

2 **☐ INTERROGATORY NO. 1.:Exclusion from the Club:** Identify all decisions, policies, or
3 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
4 members, or third parties, that led to the termination of any Swedish Club member's
5 membership and exclusion from the Swedish Club as a member, as a member of the public,
6 including the identity of those members, dates, reasons, and any notices provided to those
7 members, and what if any due process was provided to them ; from June 1, 2019 to the present.

8 **ANSWER:**

9 **☐ INTERROGATORY NO. 2.: Joint Defense Agreement - Current:** State whether a joint
10 defense agreement (JDA) exists among any of the defendants in this lawsuit, and if so, list all
11 parties to the JDA and the date it was created.

12 **ANSWER:**

13
14 **☐ INTERROGATORY NO. 3.: Joint Defense Agreement - Prior:** State whether there are
15 previous joint defense agreement(s) among any of the defendants in this lawsuit, and if so, list
16 all parties to those and the date they were created.

17 **ANSWER:**

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19 **☐ INTERROGATORY NO. 4.: JDA, Common Interest Communications(s):** Identify all
20 communications withheld under the common interest doctrine, providing a description of each
21 communication, including date, parties involved, and subject matter.

22 **ANSWER:**

23
24 **☐ INTERROGATORY NO. 5.: Defendants' Legal Representation Turnover:** Explain the
25 reasons for any changes in legal representation for each defendant group from January 1, 2024,
26 to the present, including dates and circumstances.

27 **ANSWER:**

1 **□ INTERROGATORY NO. 6.: Selection of Defense Counsels:** Identify the individuals or
2 entities responsible for selecting attorneys for defendant Groups 1, 2, and 3, and state whether
3 Great American Insurance Company approved or influenced these selections.

4 **ANSWER:**

5
6 **□ INTERROGATORY NO. 7.: Comparative Liability:** Describe any statements,
7 communications, or allegations by defendants in Groups 2, 3, or 4 attributing blame to Kristine
8 Leander or Toene Hayes (Group 1) for the events leading to this lawsuit.

9 **ANSWER:**

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11 **□ INTERROGATORY NO. 8.: Response to Plaintiff's Actual and Constructive Notices to**
12 **the Swedish Club Board of Directors:** Detail all actions taken by the Swedish Club in
13 response to the Plaintiff's actual and constructive notices to it on:

14 January 4, 2022

May 18, 2022

15 May 2, 2022

May 31, 2022

16 May 4, 2022

June 22, 2022

17 I.E., August 2022 to March 2023 – “Google Drive folder, “SC Notices to Board” that contained
18 copies of the multiples of notices/documents that Ms. Campbell had sent to the SCBOD and
19 third parties, Ms. Campbell granted the Board members with exclusive access to that folder so
20 they could access it at will. Ms. Campbell populated that folder with no less than 28
21 documents, dated between January 4, 2022 through February 13, 2023.”²

22 November 29, 2022

February 10, 2023

23 January 6, 2023

February 13, 2023

24 February 2, 2023

25 **ANSWER:**

26 **□ INTERROGATORY NO. 9.: Response to Plaintiff's Constructive and Actual Notices:**
27 Detail all actions taken by the Swedish Club in response to the Plaintiff's complaints filed with
28 the EEOC, Washington Human Rights Commission, and City of Seattle's Office of Civil
Rights, and with the Swedish Club board of directors, and to Sarah Alaimo/HR Director,
including dates, individuals involved, and outcomes.

² First Amended Complaint. Case No. 23-2-25195-4 Dkt. #17. Pages 151 to 168

1 **ANSWER:**

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4 **☐ INTERROGATORY NO. 10.: Investigation #1 of Plaintiff, Elizabeth Campbell by Perkins Coie:**

- 5 1. Identify all individuals interviewed by Perkins Coie regarding Plaintiff's complaints from January 1, 2022, to present, including dates and roles.
- 6 2. State whether Anis Rahman, Toene Hayes, Kristine Leander, Gary Sund, Lars Matthiesen, Malin Jonsson or any employees, members, or third parties provided statements or documents during the investigation, and if so, describe each.
- 7 3. During its investigation of Plaintiff describe and identify all communications between Perkins Coie and Anis Rahman, Toene Hayes, Kristine Leander, Gary Sund, Lars Matthiesen, Malin Jonsson, Judy Cooper, Karen Choyce, or any employees, members, or third parties regarding Plaintiff's complaints from January 1, 2023, to present.
- 8 4. Identify all non-privileged documents, witness statements, reports, or notes created by Perkins Coie during the investigation of Plaintiff's complaints.
- 9 5. State whether Perkins Coie considered Plaintiff's national origin, disability, or hostile workplace claims in their investigation, and detail its findings.
- 10 6. State whether Anis Rahman, Toene Hayes, Kristine Leander, Gary Sund, Lars Matthiesen, Malin Jonsson or any employees, members, or third parties provided any recommendations or opinions to the Swedish Club board during the investigation, and if so, describe each.

11 **ANSWER:**

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16 **☐ INTERROGATORY NO. 11.: Investigation #2 of Plaintiff, Elizabeth Campbell by Swedish Club board of directors, Sarah Alaimo, Kristine Leander, Elizabeth Norgren:**

- 17 a) Identify all individuals interviewed by the Swedish Club board as part of a plan to terminate Plaintiff's Swedish Club employment and membership, from January 1, 2023, to present, including dates and roles.
- 18 b) State whether Anis Rahman, Toene Hayes, Kristine Leander, Gary Sund, Sarah Alaimo, Judy Cooper, Karen Choyce, Christo Yaranoff, Lars Matthiesen, Malin Jonsson or any employees, members, or third parties provided statements or documents during the investigation, and if so, identify the individual, and the nature of the interaction or communications with each, from January 1, 2023, to present.
- 19 c) Identify all documents, witness statements, reports, or notes created by the Swedish Club board, Sarah Alaimo, Kristine Leander, or Elizabeth Norgren during the investigation of Plaintiff.
- 20 d) State whether the Swedish Club board considered Plaintiff's national origin, disability, or hostile workplace claims in their investigation, and detail findings.
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1 **ANSWER:**

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3 ☐ **INTERROGATORY NO. 12.: Retaliatory actions against the Plaintiff:** Describe any

4 retaliatory actions taken by the Swedish Club against Plaintiff following her complaints,

5 including dates and individuals involved.

6 **ANSWER:**

7

8 ☐ **INTERROGATORY NO. 13.: Claims of insubordination against the Plaintiff:** Based on

9 the Swedish Club's articles of incorporation, bylaws, organization chart, or other authorities or

10 documents, please explain the relationship between Swedish Club general members and the

11 Board of Directors, and how this relationship permits the Board to characterize a member's

12 conduct as insubordinate.

13 **ANSWER:**

14 **Interrogatories Related to Food Service Manager Position**

15 ☐ **INTERROGATORY NO. 14.: Formation Date: Hiring Process for the Food Service**

16 **Manager Position:** Describe in detail the process used to search recruit and hire the Food

17 Service Manager, between December 14, 2021 through February 2023 including:

- 18 a) How and where the job was advertised.
- 19 b) The qualifications and experience required for the position.
- 20 c) The criteria used to evaluate candidates.
- 21 d) The individuals involved in recruiting, preparing job descriptions, hiring, reviewing
- 22 applications, conducting interviews, and making the final hiring decision.
- 23 e) Any changes made to the hiring process after it was initiated and the reasons for those
- 24 changes.

ANSWER:

☐ **INTERROGATORY NO. 15.: Selection of the Food Service Manager:**

- a) Identify all individuals who applied for or were considered for the Food Service
- Manager position, including their names and relevant qualifications.

- b) State whether Elizabeth Campbell applied for or expressed interest in the Food Service Manager position. If so, describe the response she received and the reasons for any decisions made regarding her candidacy.

ANSWER:

☐ **INTERROGATORY NO. 16.: Complaints or Concerns About the Hiring Process:** State whether any complaints, concerns, or objections were raised by employees, applicants, or other individuals regarding the hiring process for the Food Service Manager position. If so, describe the nature of each complaint or concern and how it was addressed by Kristine Leander or other management personnel.

ANSWER:

INTERROGATORY NO. 17.: Interactions Between Kristine Leander and Elizabeth Campbell: Describe in detail any interactions between Kristine Leander and Elizabeth Campbell from November 24, 2021, to the date of Elizabeth Campbell's termination that are alleged to constitute mistreatment, including:

- a) The date, time, and location of each interaction.
- b) The specific words spoken or actions taken by Kristine Leander.
- c) The names of any witnesses present during each interaction.
- d) Any impact these interactions had on Elizabeth Campbell's job performance, hours, or employment status.

ANSWER:

☐ **INTERROGATORY NO. 18.: Reports of Mistreatment:** State whether Elizabeth Campbell or any other employee reported incidents of mistreatment by Kristine Leander to HR, management, or any other authority within the Swedish Club. If so, provide:

- a) The date and method of each report (e.g., email, verbal, formal complaint).
- b) The individual(s) to whom the report was made.
- c) The actions taken in response to each report, including any investigations or disciplinary measures.

ANSWER:

1 **☐ INTERROGATORY NO. 19.: Job Duties and Hours of Elizabeth Campbell:** Describe
Elizabeth Campbell's:

- 2 a) Job duties as a Cook from November 24, 2021, to the date of her termination, including
any changes to her duties and the reasons for those changes.
3 b) State the number of hours Elizabeth Campbell was scheduled to work each week during
her employment and explain any reductions in her hours, including the dates and reasons
4 for such reductions.

5 **ANSWER:**
6

7 **☐ INTERROGATORY NO. 20.: Exclusion from Meetings and Opportunities:** State
whether Elizabeth Campbell was excluded from any kitchen staff meetings or other
8 employment-related opportunities (e.g., training, promotions, or special assignments) during her
employment. If so, provide:

- 9 a) The date and nature of each exclusion.
10 b) The reason for each exclusion.
c) The names of any other employees who were included in such meetings or opportunities.

11 **ANSWER:**
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13 **☐ INTERROGATORY NO. 21.: Catering Position Offer and Withdrawal:** Describe any
offers made to Elizabeth Campbell regarding a catering position, including:

- 14 a) The date and terms of the offer.
15 b) The individual(s) who made the offer.
c) The reason for withdrawing the offer, if applicable.
16 d) Any communications with Elizabeth Campbell or others regarding the withdrawal of the
offer.

17 **ANSWER:**
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19 **Interrogatories Related to Electronic Documents and Records**

20 **☐ INTERROGATORY NO. 22.: Electronic Data Management Practices:** Describe in
detail the Swedish Club's practices for managing and storing electronic data, including but not
21 limited to:

- a) The types of electronic data stored (e.g., emails, databases, logs, text messages, chat
22 messages).
b) The systems and platforms used to store and manage this data (e.g., email servers, cloud
23 storage services like OneDrive, Google Drive, Dropbox).
24

- 1 c) The retention policies in place for electronic data, including any automatic deletion or
2 archiving procedures.
3 d) Any changes made to these systems or policies since May 5, 2022, and the reasons for
4 those changes.

5 **ANSWER:**

6 ☐ **INTERROGATORY NO. 23.: Preservation of Electronic Evidence:** State whether the
7 Swedish Club took steps to preserve electronic data in response to the litigation hold letter dated
8 May 5, 2022. If so, describe in detail the actions taken, including:

- 9 a) The date(s) on which preservation efforts began.
10 b) The individuals responsible for implementing the preservation measures.
11 c) The specific types of data preserved (e.g., emails, databases, logs).
12 d) Any instructions given to employees, board members, or third parties regarding the
13 preservation of electronic evidence.

14 **ANSWER:**

15 ☐ **INTERROGATORY NO. 24.: Electronic Mail and Communication Records:** Identify
16 all email accounts, messaging platforms (e.g., text messages, chat applications), and other
17 communication tools used by Kristine Leander, Anis Rahman, Toene Hayes, and any other
18 relevant employees or board members from January 1, 2019, to the present. For each account or
19 platform, provide:

- 20 a) The user's name and role.
21 b) The email address or account identifier.
22 c) The date range during which the account or platform was in use.
23 d) Whether the account or platform is still active.

24 **ANSWER:**

☐ **INTERROGATORY NO. 25.: Databases and Logs:** Describe all databases maintained by
the Swedish Club that contain information relevant to the matters in the litigation hold letter,
including but not limited to databases related to membership, employment, board activities, and
financial records. For each database, provide:

- a) The name and purpose of the database.
b) The types of records and fields stored.
c) The individuals responsible for maintaining and accessing the database.
d) Any logs of activity or modifications made to the database since May 5, 2022.

1 **ANSWER:**

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3 ☐ **INTERROGATORY NO. 26.: Modifications to Electronic Data Systems:** State whether

4 any modifications were made to the Swedish Club's electronic data processing systems (e.g.,

5 email systems, databases, storage platforms) since May 5, 2022, that could affect the

6 preservation or retrieval of relevant electronic data. If so, provide:

- 7 e) A detailed description of each modification.
- 8 f) The date(s) on which the modification(s) occurred.
- 9 g) The reason(s) for the modification(s).
- 10 h) The individuals or entities responsible for implementing the modification(s).

11 **ANSWER:**

12 ☐ **INTERROGATORY NO. 27.: Personal Computers and Devices:** Identify all personal

13 computers, laptops, tablets, smartphones, or other electronic devices used by Kristine Leander,

14 Anis Rahman, Toene Hayes, Chris Sisco, Wendy Lundin, Jan Sullivan, Sarah Alaimo, Christo

15 Yaranoff, and their assistants from January 1, 2019, to the present. For each device, provide:

- 16 a) The type of device (e.g., laptop, smartphone).
- 17 b) The user's name and role.
- 18 c) Whether the device is still in use or has been replaced.
- 19 d) Whether a bit-stream copy was made of the device's storage as requested in the litigation
- 20 hold letter, and if so, the date the copy was made.

21 **ANSWER:**

22 ☐ **INTERROGATORY NO. 28.: Third-Party Storage Services:** State whether the Swedish

23 Club uses any third-party storage services (e.g., OneDrive, Google Drive, Dropbox) to store

24 electronic data relevant to the matters in the litigation hold letter. If so, provide:

- a) The name of the service(s) used.
- b) The types of data stored on each service.
- c) The individuals with access to the stored data.
- d) Any steps taken to preserve data stored on these services since May 5, 2022.

ANSWER:

☐ **INTERROGATORY NO. 29.: Deletion or Destruction of Electronic Data:** State whether any electronic data relevant to the matters in the litigation hold letter has been deleted, destroyed, or otherwise made inaccessible since May 5, 2022. If so, provide:

- a) A description of the data deleted or destroyed.
- b) The date(s) on which the deletion or destruction occurred.
- c) The reason(s) for the deletion or destruction.
- d) The individuals responsible for the deletion or destruction.

ANSWER:

REQUESTS FOR PRODUCTION

☐ **REQUEST FOR PRODUCTION NO. 1.) 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. 2.) Communications by Kristine Leander:** All documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander that mention the operations, management, financial performance of the Swedish Club kitchen, bar, foodservice operations from August 15, 2020 through December 31, 2023.

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:

☐ **REQUEST FOR PRODUCTION NO. 4. Public Argument Records:** All documents, reports, or communications held, received, or transmitted by the Swedish Club related to the "clamorous and public argument" between Plaintiff and Lars Matthiesen at the Swedish Club on

1 the evening of December 17, 2021, including witness statements, incident logs, or
2 correspondence about the incident; from December 17, 2021 to the present.

3 **RESPONSE:**

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

10 **RESPONSE:**

11 ☐ **REQUEST FOR PRODUCTION NO. 6. Employment Termination Records:** All
12 documents related to Kristine Leander's alleged retirement from employment at the Swedish
13 Club, including personnel files, employment contract(s), performance reviews, disciplinary
14 records, emails, meeting notes or communications involving Kristine Leander or Plaintiff, or
15 other Defendants, Swedish Club employees, board members, or third parties; from July 1, 2019
16 to present.

17 **RESPONSE:**

18 ☐ **REQUEST FOR PRODUCTION NO. 7. Employment Termination Records:** All
19 documents related to Elizabeth Norgren's termination from employment at the Swedish Club,
20 including personnel files, performance reviews, disciplinary records, emails, meeting notes or
21 communications involving Elizabeth Norgren, Kristine Leander or other Defendants, Swedish
22 Club employees, board members, or third parties; from July 1, 2024 to present.

23 **RESPONSE:**

24 ☐ **REQUEST FOR PRODUCTION NO. 8. Employment Termination Records:** All
documents related to Sarah Alaimo's termination from employment at the Swedish Club,
including personnel files, performance reviews, disciplinary records, emails, meeting notes or
communications involving Sarah Alaimo or other Defendants, Swedish Club employees, board
members, or third parties; from July 1, 2024 to present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 9. Employment Termination Records:** All documents related to Anis Rahman's termination from employment at the Swedish Club, including personnel files, performance reviews, disciplinary records, emails, meeting notes or communications involving Anis Rahman or other Defendants, Swedish Club employees, board members, or third parties; from November 2021 to present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 10. Employment Termination Records:** All documents related to Toene Haye's termination from employment at the Swedish Club, including personnel files, performance reviews, disciplinary records, emails, meeting notes or communications involving Toene Hayes or other Defendants, Swedish Club employees, board members, or third parties; from January 1, 2020 to present.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 11. Employment Termination Records:** All documents related to all former Swedish Club employees whether voluntarily or otherwise terminated from employment at the Swedish Club, including personnel files, performance reviews, disciplinary records, emails, meeting notes or communications with Kristine Leander, Toene Hayes, Anis Rahman, Malin Jonsson, or other Defendants, Swedish Club employees, board members, or third parties; from January 1, 2020 through September 2023.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 12. Membership Exclusion Records:** All documents related to Plaintiff's exclusion from the Swedish Club as a member, including membership records, board minutes, board directors'/executive directors' emails between each other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff's membership, or Kristine Leander, or communications involving Kristine Leander or other Defendants, Swedish Club employees, board members, or third parties; from August 15, 2020 to the present.

1 **RESPONSE:**

2

3 ☐ **REQUEST FOR PRODUCTION NO. 13. Membership Exclusion Records:** All

4 documents related to any Swedish Club member's membership termination, exclusion from the

5 Swedish Club, including membership records, board minutes, board directors'/executive

6 directors' emails between each other or to that member, or notices sent to the, particularly those

involving member's membership, behavior, exclusion from the premises, conditions of return,

subsequent return to the Swedish Club, from January 1, 2019 to the present.

7 **RESPONSE:**

8

9 ☐ **REQUEST FOR PRODUCTION NO. 14. Claims of insubordination against the**

10 **Plaintiff:** All documents related to any Swedish Club articles of incorporation, bylaws,

organization chart, or other authorities or documents that support the Swedish Club's contention

11 that a general member's conduct can be characterized as insubordinate to the board of directors.

12 **ANSWER:**

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14 ☐ **REQUEST FOR PRODUCTION NO. 15. Scheme Documentation:** All documents

15 evidencing any plan, agreement, or "scheme" by Kristine Leander or other Defendants to

terminate Plaintiff's employment or revoke Plaintiff's membership, as alleged in the Letter,

including internal communications or directives; from December 1, 2021 to the present.

16 **RESPONSE:**

17

18 ☐ **REQUEST FOR PRODUCTION NO. 16. Defendant Communications:** All

19 communications between Defendants and the Swedish Club from October 1, 2020 to the present

discussing Plaintiff, the Letter, or the claims in this lawsuit.

20 **RESPONSE:**

1 ☐ **REQUEST FOR PRODUCTION NO. 17. Defendant Communications:** All letters,
2 emails and text messages between the Swedish Club/board of directors and Great American
Insurance Company from January 1, 2022, to present.

3 **RESPONSE:**
4

5 ☐ **REQUEST FOR PRODUCTION NO. 18. Defendant Communications:** All documents
6 related to Great American's reservation of rights and coverage updates from January 1, 2022, to
present

7 **RESPONSE:**
8

9 ☐ **REQUEST FOR PRODUCTION NO. 19. Defendant Communications:** All
10 communications between attorneys of different defendant groups discussing strategy or blame
attribution from January 1, 2024, to present.

11 **RESPONSE:**
12

13 ☐ **REQUEST FOR PRODUCTION NO. 20. Defendant Communications:** All drafts,
14 amendments, or related documents concerning any joint defense agreement among defendants
15 from January 1, 2024, to present.

16 **RESPONSE:**
17

18 ☐ **REQUEST FOR PRODUCTION NO. 21. Defendant Communications:** All board
19 meeting minutes or internal reports from the Swedish Club discussing the Plaintiff's EEOC,
WHRC, or Seattle OCR complaints from January 1, 2022, to present.

20 **RESPONSE:**
21

□ REQUEST FOR PRODUCTION NO. 22. Defendant Communications: All board meeting minutes or internal reports from the Swedish Club discussing the Plaintiff's Swedish Club membership and membership related matters from August 1, 2021, to present.

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 23. Defendant Communications: All board meeting minutes, board committee minutes, executive director's reports, financial reports, building and facilities reports from January 1, 2021, to December 31, 2024.

RESPONSE:

Requests for Production for Food Service Manager Position

□ REQUEST FOR PRODUCTION NO. 24.: Documents Related to the Food Service Manager Hiring Process: Please provide:

- a) All documents related to the advertisement, job description, and qualifications for the Food Service Manager position.
- b) All applications, resumes, and cover letters received for the Food Service Manager position.
- c) All notes, emails, memos, or other communications related to the selection process for the Food Service Manager position, including communications between Kristine Leander and other individuals involved in the hiring decision.

RESPONSE:

□ REQUEST FOR PRODUCTION NO. 25.: Elizabeth Campbell's Employment Records: Please provide:

- a) Elizabeth Campbell's complete personnel file, including her employment application, job description, performance reviews, disciplinary records, and any documents related to her termination.
- b) All time sheets, schedules, or payroll records reflecting Elizabeth Campbell's hours worked from November 24, 2021, to the date of her termination.
- c) All documents reflecting changes to Elizabeth Campbell's job duties or hours during her employment.

RESPONSE:

1 **□ REQUEST FOR PRODUCTION NO. 26.: Communications Between Kristine Leander**
2 **and Elizabeth Campbell:** Please provide:

- 3 a) All emails, memos, text messages, or other written communications between Kristine
4 Leander and Elizabeth Campbell from November 24, 2021, to the date of Elizabeth
5 Campbell's termination.
6 b) All written communications (e.g., emails, memos) between Kristine Leander and other
7 employees or management personnel regarding Elizabeth Campbell's employment,
8 performance, or treatment.

9 **RESPONSE:**

10 **□ REQUEST FOR PRODUCTION NO. 27.: Communications Between Kristine Leander**
11 **and Others:** Please provide: All emails, memos, text messages, or other written
12 communications between Kristine Leander and any Swedish Club board members, members,
13 employees, and any third parties and regarding Elizabeth Campbell from August 15, 2020, to the
14 date of Kristine Leander's termination.

15 **RESPONSE:**

16 **□ REQUEST FOR PRODUCTION NO. 28.: Reports and Investigations of Mistreatment:**
17 Please provide:

- 18 a) All complaints, reports, or grievances filed by Elizabeth Campbell or other employees
19 regarding mistreatment, harassment, or discrimination by Kristine Leander.
20 b) All documents related to any investigations conducted in response to such complaints,
21 including investigation reports, witness statements, and disciplinary actions taken.

22 **RESPONSE:**

23 **□ REQUEST FOR PRODUCTION NO. 29.: Kitchen Staff Meetings and Opportunities:**
24 Please provide:

- a) All agendas, minutes, or notes from kitchen staff meetings held during Elizabeth
Campbell's employment.
b) All documents reflecting Elizabeth Campbell's exclusion from kitchen staff meetings or
other employment-related opportunities.

RESPONSE:

1
2 **□ REQUEST FOR PRODUCTION NO. 30.: Catering Position Documentation:** Please
3 provide:

- 4 a) All documents related to any catering position offered to Elizabeth Campbell, including
5 job descriptions, offer letters, or communications regarding the offer.
6 b) All documents reflecting the withdrawal of the catering position offer, including any
7 communications with Elizabeth Campbell about the withdrawal.

8 **RESPONSE:**

9
10 **□ REQUEST FOR PRODUCTION NO. 31.: Policies and Procedures:** Please provide:

- 11 a) The Swedish Club's employee handbook, policies, or procedures in effect during
12 Elizabeth Campbell's employment, including policies related to hiring, promotions,
13 complaints, and workplace conduct.
14 b) Any training materials or guidelines provided to Kristine Leander or other management
15 personnel regarding employee management, anti-discrimination, or anti-harassment.
16 c) The Swedish Club's employee handbook, policies, or procedures in effect after Elizabeth
17 Campbell's employment was terminated, including policies related to hiring, promotions,
18 complaints, and workplace conduct.

19 **RESPONSE:**

20 **Requests for Production Related to Electronic Documents and Records**

21 **□ REQUEST FOR PRODUCTION NO. 32.: Litigation Hold Compliance Documentation**
22 All documents, including emails, memos, or internal communications, reflecting the Swedish
23 Club's response to the litigation hold letter dated May 5, 2022, including any instructions given
24 to employees, board members, or third parties regarding the preservation of electronic evidence.

RESPONSE:

25 **□ REQUEST FOR PRODUCTION NO. 33.: Electronic Mail and Communication Records**
26 All emails, text messages, chat messages, and other electronic communications sent or received
27 by Kristine Leander, Anis Rahman, Toene Hayes, and any other relevant employees or board
28 members from January 1, 2019, to the present, that relate to:

- 29 a) Elizabeth Campbell's employment, job duties, hours, or termination.
30 b) The Food Service Manager position, including the hiring process and selection of
31 candidates.

- 1 c) Complaints or concerns raised by Elizabeth Campbell or other employees regarding
mistreatment, discrimination, or harassment.
2 d) Board meetings, committee meetings, or other Club business relevant to the litigation.
3 **RESPONSE:**
4

5 **☐ REQUEST FOR PRODUCTION NO. 34.: Databases and Logs**

6 Copies of all databases (including all records and fields) maintained by the Swedish Club that
7 contain information relevant to the matters in the litigation hold letter, including but not limited
8 to:

- 9 a) Membership databases.
b) Employment and personnel databases.
c) Financial records.
d) Logs of activity on computer systems used to process or store relevant electronic data.
10 **RESPONSE:**
11

12 **☐ REQUEST FOR PRODUCTION NO. 35.: Bit-Stream Copies and Storage Media**

- 13 a) Copies of all bit-stream copies made of hard drives, floppy disks, CDs, DVDs, USB
drives, magnetic tapes, cartridges, or other storage media used by Kristine Leander, Anis
14 Rahman, Toene Hayes, Chris Sisco, Wendy Lundin, Jan Sullivan, Sarah Alaimo, Jocelynn
Lillis, Christo Yaranoff and their assistants, as requested in the litigation hold letter.
b) All documentation reflecting the creation, storage, and preservation of these bit-stream
copies.
15 **RESPONSE:**
16

17 **☐ REQUEST FOR PRODUCTION NO. 36.: System Modification Logs:** All logs or records
18 documenting modifications made to any electronic data processing system since May 5, 2022,
19 that may have affected the Club's ability to process or preserve relevant electronic data.
RESPONSE:
20

21 **☐ REQUEST FOR PRODUCTION NO. 37.: Third-Party Storage Service Records:** All
22 documents stored on third-party storage services (e.g., OneDrive, Google Drive, Dropbox) that
23 are relevant to the matters in the litigation hold letter, including but not limited to:
24

- 1 a) Files related to Elizabeth Campbell’s employment or the Food Service Manager position.
2 b) Board meeting minutes, agendas, or recordings.
3 c) Financial records or reports.

RESPONSE:

4
5 ☐ **REQUEST FOR PRODUCTION NO. 38.: Programs and Utilities:** Copies of all
6 application programs and utilities used by the Swedish Club to process electronic data relevant to
7 the litigation, as requested in the litigation hold letter.

RESPONSE:

8
9 ☐ **REQUEST FOR PRODUCTION NO. 39.: Evidence of Data Deletion or Destruction:** All
10 documents, including emails, memos, or logs, reflecting any deletion, destruction, or alteration
11 of electronic data relevant to the litigation since May 5, 2022.

RESPONSE:

12
13 ☐ **REQUEST FOR PRODUCTION NO. 40. Defendant Communications:** All
14 communications between Defendants and the Swedish Club from October 1, 2020 to the present
15 discussing Plaintiff, or the claims in this lawsuit.

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 - SWEDISH CLUB

1 **CERTIFICATE OF SERVICE**

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

6 Brad Bigos, WSBA No. 52297
7 Alexandro Lopez, WSBA No. 62867
8 O'HAGAN MEYER, PLLC
9 1420 Fifth Avenue, Suite 2200
10 Seattle, WA 98101
11 Tel: (206) 844-1350
12 Email: Bbigos@ohaganmeyer.com
13 Email: alopez@ohaganmeyer.com
14 ☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

15 ***Attorney for Defendant Swedish
16 Cultural Center d/b/a the Swedish Club,
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☐ WA State App Courts' eFiling Portal

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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