

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**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
TOENE HAYES**

TO: Defendant Toene Hayes:

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 TOENE HAYES – 1

Elizabeth A. Campbell, MPA
3826 24th Ave W
Seattle, WA 98199
206-769-8459
neighborhoodwarrior@gmail.com

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.

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

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

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

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

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

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

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

28 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?”

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

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

6 e. "Signed,

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

9
10 10. "**PERSON**" includes a natural person, company, firm, association, organization,
partnership, business, trust, limited liability company, corporation, or public entity.

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

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

17 Dated this 16th Day of April, 2025

18 ELIZABETH A. CAMPBELL, MPA

19 

20 Elizabeth A. Campbell, MPA

21 Plaintiff Pro Se

22 3826 24th Ave W

23 Seattle, WA 98199

24 Tel/Text: 206-769-8459

25 Fax: 206-283-6300

26 neighborhoodwarrior@gmail.com

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.: 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. 3.: Public Argument with Lars Matthiesen: The Letter references a “clamorous and public argument” between Plaintiff and Defendant Lars Matthiesen at the Swedish Club,¹² attributing it to Kristine Leander. Describe in detail the nature and extent of your personal relationship with Lars Matthiesen outside of Swedish Club activities from its earliest date to the present, including the frequency of contact, types of interactions (e.g., social, romantic, professional), and any knowledge of this incident, including the date, location, witnesses, and any role Kristine Leander or Lars Matthiesen played in causing or escalating it; from January 1, 2021 to the present.

ANSWER:

☐ INTERROGATORY NO. 4.: Employment Termination: The Letter asserts that “Kristine is the reason you no longer work there.” Describe all actions taken by Kristine Leander, you, or other Defendants, Swedish Club employees or board members, or third parties, that contributed to Plaintiff’s termination from employment at the Swedish Club, including the identity of any person, dates, reasons provided, and any related communications August 1, 2020 to the present.

ANSWER:

² On December 17, 2021

1 **☐ INTERROGATORY NO. 5.:Exclusion from the Club:** The Letter states that “Kristine is
2 the reason you are no longer allowed to enter 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 Plaintiff’s membership and exclusion
from the Swedish Club as a member, as a member of the public, including dates, reasons, and
any notices provided to Plaintiff; from September 1, 2020 to the present.

5 **ANSWER:**

6
7
8 **☐ INTERROGATORY NO. 6.:Exclusion from the Club:** Identify all decisions, policies, or
9 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
10 members, or third parties, that led to the termination of any Swedish Club member’s
11 membership and exclusion from the Swedish Club as a member, as a member of the public,
including dates, reasons, and any notices provided to those members; from June 1, 2019 to the
present.

12 **ANSWER:**

13
14 **☐INTERROGATORY NO. 7.: Scheme Allegation:** The Letter claims Plaintiff’s termination
15 and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any
16 plans, agreements, or coordinated efforts by you or among Defendants or with third parties, to
17 terminate Plaintiff’s employment or the termination of Plaintiff’s membership, including
participants, timelines, and objectives; from August 15, 2020 to the present.

18 **ANSWER:**

19
20
21 **☐INTERROGATORY NO. 8.: Role and Involvement at the Swedish Club:** Describe your
22 role(s) and responsibilities at the Swedish Club from August 15, 2020, to the present, including
23 any positions held (e.g., bookkeeper, staff accountant, business manager, HR manager), your
24 interactions with Kristine Leander, Sarah Alaimo, Elizabeth Norgren, and the Swedish Club
Board of Directors, and whether you were paid, reimbursed expenses, or otherwise compensated
for any of these duties (including amounts and dates of compensation, payments or
reimbursements).

25 **ANSWER:**

26
27
28 **☐INTERROGATORY NO. 9.: Relationship with the Swedish Club Employees, Members,
and Board of Directors:** Describe your formal and informal relationships with any Swedish

1 Club employees, supervisors, members, or board directors from January 1, 2021 through
2 September 2023, and any disagreements you had with any of them.

3 **ANSWER:**

4
5 **☐ INTERROGATORY NO. 10.: March 1, 2023 Incident:** Describe in detail your actions and
6 statements during the incident on March 1, 2023, at the Swedish Club including whether you
7 made physical contact with Ms. Campbell, spoke to her, your verbal statements to or about her,
8 your intent, and the circumstances leading to this interaction.

9 **ANSWER:**

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

17 **ANSWER:**

18 **☐ INTERROGATORY NO. 12.: Aggression Allegations:** The complaint alleges you
19 supported Kristine Leander's campaign of aggression against Elizabeth Campbell as a Swedish
20 Club employee or member through out 2022 on into 2023. Describe any actions you took or
21 statements you made, or assistance you provided to undermine Ms. Campbell's membership or
22 employment, including alone or in concert with others, Kristine Leander, Anis Rahman, Sarah
23 Alaimo, any board member, or with any kitchen staff or other Swedish Club employee(s) or
24 member(s); conversely, provide any actions you took, statements you made, or assistance you
25 provided to support or elevate Ms. Campbell's membership or employment, alone or in concert
26 with others.

27 **ANSWER:**

28 **☐ INTERROGATORY NO. 13.: Hostile Environment:** The complaint alleges you
contributed to a hostile environment for Ms. Campbell as an employee and member. Identify any
actions you took or observed that could have been perceived as hostile toward Ms. Campbell,
including but not limited to board meeting conduct, communications with other defendants, or
club policies you enforced.

1 **ANSWER:**

2

3

4 ☐ **INTERROGATORY NO. 14.: Behavior at Other Locations:** Describe any incidents from

5 January 1, 2015, to the present at your place of employment, at the Swedish Club, or other places

6 you frequent where you have been accused of assaulting, pushing, hitting, verbally abusing, or

7 acting aggressive towards individuals, including the dates, locations, individuals involved, and

8 outcomes (e.g., reprimands, complaints).

9 **ANSWER:**

10 ☐ **INTERROGATORY NO. 15.: Disciplinary History:** Identify any instances from January 1,

11 2015, to the present where you were reprimanded, disciplined, or investigated for assault, verbal

12 abuse, defamation, or other behavioral issues at your place of employment, the Swedish Club, or

13 other organizations, including the dates, entities involved, and outcomes.

14 **ANSWER:**

15

16 ☐ **INTERROGATORY NO. 16.: Mental Health and Behavioral Treatment:** State whether

17 you have received psychiatric treatment, attended anger management classes, or undergone other

18 behavioral health evaluations or treatment for mental health conditions from January 1, 2015, to

19 the present, including the dates, providers, and reasons for such treatment (without disclosing

20 privileged medical details unless ordered by the court).

21 **ANSWER:**

22 ☐ **INTERROGATORY NO. 17.: Communications About Kristine Leander:** Describe all

23 communications you had with any defendant, Swedish Club board member, members, or

24 employee about Kristine Leander's management of the Swedish Club, her personal attitude,

25 behavior, or reasons for her retirement between January 1, 2021, and December 31, 2023,

26 including the date, medium, and content of each communication.

27 **ANSWER:**

28 ☐ **INTERROGATORY NO. 18.: Communications About Sarah Alaimo:** Describe all

communications you had with any defendant or Swedish Club executive director, board member,

1 member, or employee about Sarah Alaimo's hiring, the purpose of her hiring, her job
2 performance, duties, or reasons for her termination, between October 1, 2022, and November 30,
3 2024, including the date, medium, and content of each communication.

4 **ANSWER:**

5
6 **☐ INTERROGATORY NO. 19.: Communications About Elizabeth Norgren:** Describe all
7 communications you had with any defendant or Swedish Club board member, members, or
8 employee about Elizabeth Norgren's management of the Swedish Club, her personal attitude,
9 behavior, or reasons for her termination, between February 1, 2023, and November 30, 2024,
10 including the date, medium, and content of each communication.

11 **ANSWER:**

12 **☐ INTERROGATORY NO. 20.: Communications About Elizabeth Campbell:** Describe all
13 communications you had with any defendant or Swedish Club board member, member, or
14 employee about Elizabeth Campbell's job performance, relationships as a member or employee,
15 reasons for her termination, or termination of her membership between August 15, 2020, and the
16 present, including the date, medium, and content of each communication.

17 **ANSWER:**

18 **☐ INTERROGATORY NO. 21.: Interactions with Plaintiff:** Describe all interactions you
19 had with Plaintiff Elizabeth Campbell from August 15, 2020, to March 1, 2023, including any
20 communications (in-person, written, or electronic) and the context, purpose, and content of those
21 interactions, with specific detail about any physical contact or verbal exchanges.

22 **ANSWER:**

23
24 **☐ INTERROGATORY NO. 22.: Knowledge of Harassment:** Identify any complaints,
25 concerns, communications, or observations you received or made about harassment,
26 discrimination, or retaliation against Ms. Campbell or any other Swedish Club members or
27 employees from August 15, 2020, to the present, including the individuals involved and your
28 response to such information.

ANSWER:

1 **□ INTERROGATORY NO. 23.: Knowledge of Harassment:** Identify any complaints,
2 concerns, communications, or observations you made for or against Ms. Campbell to any other
3 Swedish Club members or employees from August 15, 2020, to the present, including the
4 individuals involved and their response to your communications.

5 **ANSWER:**

6
7 **□ INTERROGATORY NO. 24.: Emotional Distress Allegations:** The complaint alleges your
8 actions caused Ms. Campbell emotional distress. Identify any actions you took that you believe
9 could have affected Ms. Campbell's emotional well-being and explain why you believe those
10 actions were justified or appropriate.

11 **ANSWER:**

12
13 **Interrogatories Addressing Denials**
14 **For Defendant Toene Hayes (Re: Complaint ¶¶ 5.602–5.658 et seq.)**

15 **□ INTERROGATORY NO. 25.:**For each allegation in Complaint paragraphs 5.602 to 5.658 et
16 seq. directed at Defendant Toene Hayes, state the specific factual basis for your denial in the
17 Answer. Include:

- 18 a) A detailed description of the facts supporting each denial.
19 b) The full name, contact information, and a summary of the knowledge of each witness who
20 can support your position.
21 c) The title, date, author, and current custodian of each document that supports your position.

22 **ANSWER:**

23 **NOTICE: Interrogatories No. 26 to 40 are directed to You, Toene Hayes, and are intended**
24 **to apply to all defendants within your Defendant Group who are represented by your**
25 **shared counsel and who have filed joint or substantively identical answers and affirmative**
26 **defenses.**

27 **General Denials**
28 **(Both Defendants)**

□ INTERROGATORY NO. 26.: If any co-defendant within your Defendant Group asserts a
different position than the ones in DEFENDANTS SWEDISH CULTURAL CENTER, LANGDON
MILLER, KRIS JOHANSSON, GARY SUND, AND SHARON LUCAS ANSWER AND
AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST AMENDED COMPLAINT IN CAMPBELL V.

1 LUCAS, ET AL., CASE NO. 23-2-25195-4 SEA,³ please identify that defendant or defendants and
2 specify the variance.

3 **ANSWER:**

4
5 ☐ **INTERROGATORY NO. 27.** Regarding your general denial of allegations related to board
6 meeting arrangements, describe in detail the arrangements made for the board meetings on June
7 3, 2022, November 2, 2022, and March 1, 2023, including seating, food, and materials provided
8 to attendees. Include:

- 9 a) The facts supporting your denial of any improper conduct.
10 b) Identification of witnesses with knowledge of these arrangements.
11 c) Identification of documents (e.g., emails, meeting plans) related to these arrangements.

12 **ANSWER:**

13 ☐ **INTERROGATORY NO. 28.** Regarding your denial of allegations related to Plaintiff's
14 employment termination, state the specific reasons for Plaintiff's termination, including:

- 15 a) The factual basis for the decision.
16 b) Identification of witnesses involved in or aware of the decision.
17 c) Identification of documents (e.g., termination letters, performance reviews) related to the
18 termination.

19 **ANSWER:**

20 **Interrogatories Addressing Affirmative Defenses**
21 **(For Both Defendants)**

22 ☐ **INTERROGATORY NO. 29.** Regarding your affirmative defense of failure to state a claim
23 (Answer, Defense 1), identify each cause of action in the Complaint that you believe is deficient
24 and state:

- 25 a) The specific legal or factual elements you contend are inadequately pleaded.
26 b) Identification of any witnesses with knowledge of the alleged deficiencies.
27 c) Identification of any documents (e.g., legal memoranda) supporting this defense.

28 **ANSWER:**

³ King County Court Lead Case No. 23-2-25128-8, Dkt. Item No. 138

1 ☐ **INTERROGATORY NO. 30.:** Regarding your affirmative defense that Plaintiff's claims
2 may be time-barred (Answer, Defense 2), identify:

- 3 a) Each cause of action you believe is barred.
4 b) The applicable statute of limitations for each.
5 c) The date(s) you believe each claim accrued.
6 d) Identification of witnesses with knowledge of the dates or events relevant to accrual.
7 e) Identification of documents (e.g., dated correspondence) supporting the accrual dates.

8 **ANSWER:**

9 ☐ **INTERROGATORY NO. 31.:** Regarding your affirmative defense of laches, waiver,
10 estoppel, and/or unclean hands (Answer, Defense 4), describe:

- 11 a) Each specific act or omission by Plaintiff that you contend supports these defenses,
12 including dates and persons involved.
13 b) Identification of witnesses with knowledge of Plaintiff's alleged acts or omissions.
14 c) Identification of documents (e.g., emails, records of delays) supporting these defenses.

15 **ANSWER:**

16 ☐ **INTERROGATORY NO. 32.:** Regarding your affirmative defense that statements were
17 truthful or opinion (Answer, Defense 5), identify:

- 18 a) Each statement you made about Plaintiff alleged in the Complaint, and specific paragraphs
19 for each defendant).
20 b) The date, context, and recipient of each statement.
21 c) The factual basis or evidence showing each statement was true or an opinion.
22 d) Identification of witnesses with knowledge of the statements or their truthfulness.
23 e) Identification of documents (e.g., communications, witness statements) supporting the
24 truth or opinion nature of the statements.

25 **ANSWER:**

26 ☐ **INTERROGATORY NO. 33.:** Regarding your affirmative defense of justification (Answer,
27 Defense 6), describe:

- 28 a) Each action you took alleged in the Complaint (including specific paragraphs for each
defendant).
b) The specific business interest you claim to have protected.
c) How each action was necessary and lacked malice.
d) Identification of witnesses with knowledge of the business interests or actions.
e) Identification of documents (e.g., Club policies, meeting minutes) supporting this defense.

ANSWER:

1
2
3 ☐ **INTERROGATORY NO. 34.:** Regarding your affirmative defense of lack of causation
4 (Answer, Defense 7), identify:

- 5 a) Any alternative cause(s) you contend produced Plaintiff's alleged harms (e.g., emotional
6 distress, membership restrictions).
7 b) The dates, persons, and events related to these alternative causes.
8 c) Identification of witnesses with knowledge of these alternative causes.
9 d) Identification of documents (e.g., medical records, incident reports) supporting this
10 defense.

11 **ANSWER:**

12 ☐ **INTERROGATORY NO. 35.:** Regarding your affirmative defense of no duty owed
13 (Answer, Defense 9), state:

- 14 a) Whether you contend you owed no duty to Plaintiff as a Swedish Club member or
15 employee.
16 b) The factual and legal basis for this contention, including any applicable Club policies.
17 c) Identification of witnesses with knowledge of the duties or policies.
18 d) Identification of documents (e.g., bylaws, employment contracts) supporting this defense.

19 **ANSWER:**

20 ☐ **INTERROGATORY NO. 36.:** Regarding your affirmative defense of bad faith/improper
21 purpose (Answer, Defense 20), describe:

- 22 a) Each specific act by Plaintiff that you contend shows her lawsuit was filed in bad faith or
23 for an improper purpose.
24 b) The dates, evidence, and how each act violates CR 11.
25 c) Identification of witnesses with knowledge of Plaintiff's alleged bad faith.
26 d) Identification of documents (e.g., prior filings, communications) supporting this defense.

27 **ANSWER:**

28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
Interrogatories Addressing Other Defense Matters
(For Both Defendants)

☐ **INTERROGATORY NO. 37.:** Regarding your assertion that you acted within your roles
and duties at the Swedish Club (Answer, Defense 6), describe:

- a) Your specific roles and responsibilities from January 1, 2020, to present.

- 1 b) Any authority you had over Plaintiff's employment, membership, or access to Club
2 meetings.
3 c) Identification of witnesses with knowledge of your roles and authority.
4 d) Identification of documents (e.g., job descriptions, board resolutions) defining your roles.

5 **ANSWER:**

6 ☐ **INTERROGATORY NO. 38.:** Regarding your assertion that your actions were reasonable
7 (Answer, Defense 8), describe:

- 8 a) Each action you took alleged in the Complaint (including specific paragraphs for each
9 defendant).
10 b) Why you believe each action was reasonable under the circumstances.
11 c) Identification of witnesses who can attest to the reasonableness of your actions.
12 d) Identification of documents (e.g., Club policies, witness statements) supporting the
13 reasonableness of the actions.

14 **ANSWER:**

15 ☐ **INTERROGATORY NO. 39.:** Identify all communications you had with Plaintiff from
16 January 1, 2020, to present, including:

- 17 a) The date, method (e.g., email, in-person), participants, and a summary of the content.
18 b) Identification of witnesses present during or aware of these communications.
19 c) Identification of documents (e.g., emails, notes) memorializing these communications.

20 **ANSWER:**

21 ☐ **INTERROGATORY NO. 40.:** Identify all persons with whom you discussed Plaintiff's
22 employment, membership, or conduct at the Swedish Club from January 1, 2020, to present,
23 including:

- 24 a) The date, context, and substance of each discussion.
25 b) Identification of witnesses to these discussions.
26 c) Identification of documents (e.g., emails, meeting notes) related to these discussions.

27 **ANSWER:**

REQUESTS FOR PRODUCTION

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

RESPONSE:

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

RESPONSE:

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

RESPONSE:

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

RESPONSE:

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

RESPONSE:

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

10 **RESPONSE:**

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

15 **RESPONSE:**

16 **□ REQUEST FOR PRODUCTION NO. 8.: Communications with Plaintiff:** Produce all
17 documents, including emails, text messages, letters, or notes, reflecting communications between
18 you and Plaintiff Elizabeth Campbell from August 15, 2020, to the present, with specific
19 emphasis on any related to the March 1, 2023 incident.

20 **RESPONSE:**

21 **□ REQUEST FOR PRODUCTION NO. 9.: Complaints and Investigations:** Produce all
22 documents reflecting complaints, concerns, or investigations related to harassment,
23 discrimination, or retaliation at the Swedish Club from August 15, 2020, to the present, including
24 those involving Ms. Campbell or other members/employees, and your role in addressing or
25 responding to such complaints.

26 **RESPONSE:**

27 **□ REQUEST FOR PRODUCTION NO. 10.: Communications with Other Defendants:**
28 Produce all documents, including emails, text messages, letters, or notes, reflecting
communications between you and defendants Kristine Leander, Elizabeth Norgren, Anis

1 Rahman, Molly Olson, Shama Albright, Sarah Alaimo, or any Swedish Club board members,
2 members, or employees from August 15, 2020, to the present regarding Ms. Campbell, this
3 lawsuit, Leander, Rahman, Alaimo, or Norgren as specified in Interrogatories 17 to 20.

4 **RESPONSE:**

5
6 **□ REQUEST FOR PRODUCTION NO. 11.: March 1, 2023 Incident Records:** Produce all
7 documents related to the March 1, 2023 incident, before or after the Swedish Club board
8 meeting, and communications about the incident (e.g., your statements to others) as identified in
9 Interrogatories 6, 11 above, and any reprimands, congratulations, or promotions you received as
10 a result.

11 **RESPONSE:**

12 **□ REQUEST FOR PRODUCTION NO. 12.: Behavioral Incidents:** Produce all documents
13 reflecting complaints, reprimands, investigations, or disciplinary actions against you for the
14 assault, pushing, aggressively touching, hitting, verbal abuse, or defamation of others, fellow
15 employees, fellow members, or third parties at your place of employment, the Swedish Club, or
16 at any other locations from January 1, 2015, to the present, including correspondence and
17 outcomes.

18 **RESPONSE:**

19 **□ REQUEST FOR PRODUCTION NO. 13.: Mental Health and Behavioral Treatment**
20 **Records:** Produce all non-privileged documents (e.g., attendance certificates, correspondence)
21 reflecting your participation in psychiatric treatment, anger management classes, or other
22 behavioral health evaluations or treatment from January 1, 2015, to the present, excluding
23 privileged medical records unless ordered by the court.

24 **RESPONSE:**

25 **□ REQUEST FOR PRODUCTION NO. 14.: Personal Notes and Diaries:** Produce any
26 personal notes, diaries, or journals you maintained from August 15, 2020, to the present that
27 reference Ms. Campbell, the March 1, 2023 incident, the Swedish Club's operations, board
28 meetings, elections, or interactions with other defendants or board members.

RESPONSE:

1 **□ REQUEST FOR PRODUCTION NO. 15.: 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
4 or records of actions taken to limit her membership rights.

5 **RESPONSE:**
6

7 **□ REQUEST FOR PRODUCTION NO. 16.: Social Media and Public Statements:** Produce
8 any social media posts, comments, or public statements you made from August 15, 2020, to the
9 present regarding Ms. Campbell, the March 1, 2023 incident, the Swedish Club, or the events
10 described in the complaint, including screenshots or archived versions.

11 **RESPONSE:**
12

13 **□ REQUEST FOR PRODUCTION NO. 17.: Joint Defense Agreements, Defendant**
14 **Communications:** Produce all non-privileged documents reflecting any joint defense
15 agreements, shared legal strategies, or communications with other defendants or their counsel
16 regarding this lawsuit from January 1, 2023, to the present.

17 **RESPONSE:**
18

19 **□ REQUEST FOR PRODUCTION NO. 18.: Training Materials:** Produce all documents
20 related to HR training or guidance you obtained or that were provided to you as the Swedish
21 Club’s titular human resources manager from January 1, 2020, to October 2022 including
22 presentations, handouts, or correspondence about such training.

23 **RESPONSE:**
24

25 **□ REQUEST FOR PRODUCTION NO. 19.: Knowledge of Harassment:** Produce all
26 documents, including emails, text messages, letters, or notes, reflecting communications
27 identified in Interrogatories 2, 7, 12, 13, 22 to 23.

28 **ANSWER:**

1 **NOTICE: Requests for Production No. 20 to 31 are directed to You, Toene Hayes, and are**
2 **intended to apply to all defendants within your Defendant Group who are represented by**
3 **your shared counsel and who have filed joint or substantively identical answers and**
4 **affirmative defenses.**

5 **Requests Addressing Affirmative Defenses**
6 **For Both Defendants**

7 ☐ **REQUEST FOR PRODUCTION NO. 20.:** Produce all documents supporting your
8 affirmative defense of failure to state a claim (Answer, Defense 1), including legal memoranda
9 or analyses showing why Plaintiff's claims are deficient.

10 **RESPONSE:**

11 ☐ **REQUEST FOR PRODUCTION NO. 21.:** Produce all documents supporting your
12 affirmative defense that Plaintiff's claims are time-barred (Answer, Defense 2), including
13 records of when alleged acts occurred or complaints were made.

14 **RESPONSE:**

15 ☐ **REQUEST FOR PRODUCTION NO. 22.:** Produce all documents supporting your
16 affirmative defense of laches, waiver, estoppel, or unclean hands (Answer, Defense 4), including
17 communications or records showing Plaintiff's alleged delays or misconduct.

18 **RESPONSE:**

19 ☐ **REQUEST FOR PRODUCTION NO. 23.:** Produce all documents containing or discussing
20 statements you made about Plaintiff alleged in the Complaint (e.g., ¶ 475–476, and specific
21 paragraphs for each defendant), including emails, texts, or social media posts, and any evidence
22 showing the statements were true or opinions.

23 **RESPONSE:**

24 ☐ **REQUEST FOR PRODUCTION NO. 24.:** Produce all Swedish Club policies, bylaws, or
25 guidelines from January 1, 2020, to present, governing your duties, board meeting arrangements,
26 member rights, or employee conduct.

27 **RESPONSE:**

1
2
3 ☐ **REQUEST FOR PRODUCTION NO. 25.:** Produce all documents supporting your
4 affirmative defense of justification (Answer, Defense 6), including records of business interests
5 you claim to have protected and how your actions were necessary.

6 **RESPONSE:**
7

8 ☐ **REQUEST FOR PRODUCTION NO. 26.:** Produce all documents supporting your
9 affirmative defense of lack of causation (Answer, Defense 7), including records suggesting
10 Plaintiff's harms were caused by others or unrelated to your actions.

11 **RESPONSE:**
12

13 ☐ **REQUEST FOR PRODUCTION NO. 27.:** Produce all documents supporting your
14 affirmative defense of no duty owed (Answer, Defense 9), including Club policies or legal
15 opinions stating you had no duty to Plaintiff.

16 **RESPONSE:**
17

18 ☐ **REQUEST FOR PRODUCTION NO. 28.:** Produce all documents supporting your
19 affirmative defense of bad faith/improper purpose (Answer, Defense 20), including
20 communications or records suggesting Plaintiff's lawsuit is frivolous or harassing.

21 **RESPONSE:**
22

23 **Requests Addressing Other Defense Matters**
24 **For Both Defendants**

25 ☐ **REQUEST FOR PRODUCTION NO. 29.:** Produce all performance reviews, disciplinary
26 records, or complaints related to Plaintiff's employment at the Swedish Club from January 1,
27 2020, to present.

28 **RESPONSE:**

☐ **REQUEST FOR PRODUCTION NO. 30.:** Produce all communications between you and Swedish Club board members, staff, or counsel from January 1, 2020, to present, regarding Plaintiff's employment termination or membership restrictions.

RESPONSE:

☐ **REQUEST FOR PRODUCTION NO. 31.:** Produce all documents related to your roles or authority at the Swedish Club from January 1, 2020, to present, including job descriptions, contracts, or board resolutions.

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 - TOENE HAYES

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 TOENE HAYES via the method indicated below and addressed to the following:

Brad Bigos, WSBA No. 52297
Alexandro Lopez, WSBA No. 62867
O'HAGAN MEYER, PLLC
1420 Fifth Avenue, Suite 2200
Seattle, WA 98101
Tel: (206) 844-1350
Email: Bbigos@ohaganmeyer.com
Email: alopez@ohaganmeyer.com
☐ CM/ECF System
☐ 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
Sarah A. Tatistcheff, WSBA No. 51098
PATTERSON BUCHANAN FOBES &
LEITCH, INC., P.S.
1000 Second Ave., 30th Floor
Seattle, WA 98104
Telephone: 206-844-1350
Email: mstarks@pattersonbuchanan.com
Email: SAT@pattersonbuchanan.com
☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

***Attorney for Defendant Alaimo, Albright,
Emerson, Faino, M. Johansson, Norgren,
Odderson, Smith, and Snyder***

Nicholas C. Larson, WSBA #46034
Miguel E. Mendez-Pintado, WSBA
#61404
Murphy, Pearson, Bradley & Feeney
520 Pike St, Ste 1205
Seattle, WA 98101
206-219-2008
nlarson@mpbf.com
mmendezpintado@mpbf.com
☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ WA State App Courts' eFiling Portal

Attorney for Def Matthiesen

Karen Kalzer, WSBA #25429
Hellsell Fetterman
800 Fifth Ave, Suite 3200
Seattle, WA 98104
206-680-2125
kkalzer@hellsell.com
☐ CM/ECF System
☐ KC E-File Service
☒ Email
☐ Legal Messenger
☐ U.S. Mail
☐ 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.



Elizabeth A. Campbell, MPA
Plaintiff, Pro Se
3826 24th Ave W
Seattle, WA 98199
Tel/Text: 206-769-8459
Fax: 206-283-6300
neighborhoodwarrior@gmail.com