

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Identify the author of the Letter and how knowledge was obtained, July 1, 2024–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a detailed privilege log is required under CR 26(b)(5). The request is narrowly tailored to uncover Leander’s knowledge of defamatory acts, and CR 33(a) requires complete answers.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation/harassment, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; Letter not in SAC, tied to Leander’s gossip (¶¶ 5.659–5.670)</p>	<p>Kristine Leander, Elizabeth Campbell; July 2024 (Letter receipt)</p>
<p>Interrogatory No. 2: Describe your actions or plans to terminate Campbell’s membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 56 (Breach of Contract - Membership) as alleged in SAC ¶¶ 5.659–5.776. The request is tailored to Leander’s exclusion actions, and CR 33(a) requires specific answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>Interrogatory No. 3: Identify instances of gossip about Campbell you initiated or heard, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COAs 45–46 (Hostile Work Environment) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to Leander’s conduct, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.481–5.512 (hostile workplace), pages 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2023 (club discussions)</p>
<p>Interrogatory No. 4: State knowledge of the December 17, 2021, Campbell-Matthiesen argument, January 1, 2021–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.891–5.898. The request is narrowly tailored to the incident, and CR 33(a) requires complete answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander’s role, including 5.775), pages 332–335</p>	<p>Kristine Leander, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>Interrogatory No. 5: Describe your actions contributing to Campbell's employment termination, August 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) and COAs 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.659–5.776. The request is tailored to Leander's role, and CR 33(a) requires specific answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.659–5.776 (Leander's termination, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; January 18, 2022 staff meeting</p>
<p>Interrogatory No. 6: Identify decisions or actions you took leading to Campbell's membership exclusion, September 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.659–5.776. The request is relevant to Leander's exclusion actions, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander's exclusion, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>Interrogatory No. 7: Identify other membership terminations you influenced, June 1, 2019–present. Legal Foundation: CR 26(b)(1) allows discovery relevant to COA 55 (Public Accommodation) and COA 56 (Breach of Contract - Membership) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to uncover exclusion patterns, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires specific answers.</p>	<p>55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 364, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; June 2019–2025 (membership terminations)</p>
<p>Interrogatory No. 8: Describe coordinated efforts with others to terminate Campbell's employment or membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover schemes, and CR 33(a) requires detailed answers.</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's scheme, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 333–334, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Gary Sund; August 2020–2023 (scheme)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>Interrogatory No. 9: Identify witnesses to events in the Letter, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 16 (Tortious Interference with Contract-Membership) as alleged in SAC ¶¶ 5.659–5.776. The request is tailored to uncover evidence of Leander’s actions, and CR 33(a) requires complete answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.18–5.52 (membership), ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), pages 327–329, 332–335, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020–2025 (club events)</p>
<p>Interrogatory No. 10: Describe discussions about Campbell’s lawsuit, membership, or termination with board members, during or after your tenure. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to board communications, and CR 33(a) requires detailed answers.</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), ¶¶ 5.18–5.52 (membership), ¶¶ 5.174–5.177 (employment), pages 333–334, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club board; August 2020–2025 (board discussions)</p>
<p>Interrogatory No. 11: Describe drafting talking points or speeches for Gary Sund during his board presidency, including the April 20, 2022, meeting. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 16 (Tortious Interference with Contract-Membership) as alleged in SAC ¶¶ 5.785–5.864. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to Leander’s influence, and CR 33(a) requires detailed answers.</p>	<p>16: Tortious Interference with Contract-Membership, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), pages 333, 366</p>	<p>Kristine Leander, Gary Sund, Elizabeth Campbell; April 20, 2022 meeting</p>
<p>Interrogatory No. 12: Describe discussions about Campbell’s lawsuit, membership, or mistreatment with Cooper, Choyce, or Matthiesen, during or after your tenure. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 16 (Tortious Interference with Contract-Membership) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to specific communications, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Elizabeth Campbell, Judy Cooper, Karen Choyce, Lars Matthiesen; August 2020–2025 (discussions)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>Interrogatory No. 13: Describe discussions about Campbell's lawsuit, membership, or mistreatment with club members or third parties, during or after your tenure. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to external communications, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775), ¶¶ 5.174–5.177 (employment), pages 332–334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club members; August 2020–2025 (discussions)</p>
<p>Interrogatory No. 14: State the date and reasons for your resignation or retirement from the Swedish Club. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. The request is narrowly tailored to resignation details, and CR 33(a) requires specific answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell; August 2020–2025 (resignation)</p>
<p>Interrogatory No. 15: Describe events or communications with Alaimo, Norgren, Sund, Albright, Miller, Olson Smith, or others influencing your resignation. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to resignation context, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 334, 357–361</p>	<p>Kristine Leander, Sarah Alaimo, Elizabeth Norgren, Gary Sund; August 2020–2025 (resignation events)</p>
<p>Interrogatory No. 16: Describe concerns raised about club operations, personnel, or governance before resigning. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to pre-resignation issues, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell; August 2020–2025 (club concerns)</p>

<p>Interrogatory No. 17: Describe post-retirement payments from the Swedish Club, including two \$25,000 payments. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring financial motives. The request is narrowly tailored to payments, and CR 33(a) requires specific answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (payments)</p>
<p>Interrogatory No. 18: Describe any retirement-related settlement agreements with the Swedish Club. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to settlement terms, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (settlements)</p>
<p>Interrogatory No. 19: Describe any severance agreements or payments from the Swedish Club. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring financial motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to severance details, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (severance)</p>
<p>Interrogatory No. 20: Describe other post-termination agreements with the Swedish Club. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to agreements, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (agreements)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>Interrogatory No. 21: Describe additional settlement or retirement funds received beyond the two \$25,000 payments. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring financial motives. The request is narrowly tailored to additional funds, and CR 33(a) requires specific answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (funds)</p>
<p>Interrogatory No. 22: Describe communications about post-retirement payments or agreements with the Swedish Club. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to payment discussions, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club board; Post-retirement 2020–2025 (payment communications)</p>
<p>Interrogatory No. 23: Describe your personal relationship with Lars Matthiesen outside club activities, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898, exploring motives. The request is tailored to relationship details, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (relationship)</p>
<p>Interrogatory No. 24: Describe discussions with Matthiesen about Campbell's employment, termination, or membership, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 16 (Tortious Interference with Contract-Membership) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to specific communications, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (discussions)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>Interrogatory No. 25: Describe actions with Matthiesen that contributed to Campbell's job loss, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898. The request is tailored to employment-related actions, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 334, 357–361</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (job loss actions)</p>
<p>Interrogatory No. 26: Describe actions with Matthiesen impacting Campbell's membership rights, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 56 (Breach of Contract - Membership) as alleged in SAC ¶¶ 5.891–5.898. The request is tailored to membership actions, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 333, 364, 366</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (membership actions)</p>
<p>Interrogatory No. 27: Describe instances where Matthiesen mistreated Campbell in your presence or communicated intent to mistreat her, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 18 (Tort of Outrage) as alleged in SAC ¶¶ 5.891–5.898. The request is tailored to mistreatment incidents, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335, 357–361</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (mistreatment)</p>
<p>Interrogatory No. 28: Summarize Matthiesen's statements about Campbell's character, job, or membership, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to statements, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (statements)</p>

<p>Interrogatory No. 29: Describe activities with Matthiesen intended to destabilize Campbell's relationship with him, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 18 (Tort of Outrage) as alleged in SAC ¶¶ 5.659–5.776 (substituting for FAC ¶ 1.17 et seq.). The request is tailored to relationship interference, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (relationship interference)</p>
<p>Interrogatory No. 30: State the factual basis for denials of allegations in SAC ¶¶ 5.659–5.776, including witnesses and documents. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 13–19 (Leander's actions) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to denial details, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; August 2020–2025 (denials)</p>
<p>RFP No. 1: Produce documents related to the Letter's creation or sending, December 1, 2024–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is narrowly tailored to uncover Leander's involvement, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335</p>	<p>Kristine Leander, Elizabeth Campbell; December 2024 (Letter creation)</p>
<p>RFP No. 2: Produce your documents mentioning Campbell, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to Leander's actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.481–5.512 (hostile workplace), pages 333–334, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>

<p>RFP No. 3: Produce documents reflecting gossip about Campbell, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) and COAs 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover Leander’s conduct, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.481–5.512 (hostile workplace), pages 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2025 (gossip records)</p>
<p>RFP No. 4: Produce records of the December 17, 2021, Campbell-Matthiesen argument, December 17, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.891–5.898. The request is narrowly tailored to the incident, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander’s role, including 5.775), pages 332–335</p>	<p>Kristine Leander, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>
<p>RFP No. 5: Produce Campbell’s employment termination records, March 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 17 (Tortious Interference with Employment Expectancy) and COAs 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to termination records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.659–5.776 (Leander’s termination, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; March 2021–2025 (termination records)</p>
<p>RFP No. 6: Produce Campbell’s membership exclusion records, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to exclusion practices, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander’s exclusion, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Gary Sund; August 2020–2025 (exclusion records)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>RFP No. 7: Produce documents evidencing a scheme to terminate Campbell's employment or membership, December 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover schemes, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's scheme, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 333–334, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Toene Hayes, Gary Sund; December 2021–2025 (scheme records)</p>
<p>RFP No. 8: Produce communications between defendants about Campbell or this lawsuit, October 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to coordinated actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 332–334, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Gary Sund, Toene Hayes; October 2020–2025 (communications)</p>
<p>RFP No. 9: Produce communications with Gary Sund, including talking points for the April 20, 2022, meeting, October 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 16 (Tortious Interference with Contract-Membership) as alleged in SAC ¶¶ 5.785–5.864. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to Sund's presidency, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 333, 366</p>	<p>Kristine Leander, Gary Sund, Elizabeth Campbell; April 20, 2022 meeting</p>
<p>RFP No. 10: Produce communications with Matthiesen about Campbell, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to Matthiesen's interactions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (communications)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>RFP No. 11: Produce communications with Matthiesen about your personal relationship, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 18 (Tort of Outrage) as alleged in SAC ¶¶ 5.891–5.898, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to relationship details, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (relationship communications)</p>
<p>RFP No. 12: Produce notes or diaries about Matthiesen's discussions of Campbell, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to personal records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (notes)</p>
<p>RFP No. 13: Produce communications with Matthiesen impacting Campbell's job, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to job-related actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 334, 357–361</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (job communications)</p>
<p>RFP No. 14: Produce communications with Matthiesen impacting Campbell's membership, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 16 (Tortious Interference with Contract-Membership) and COA 56 (Breach of Contract - Membership) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to membership actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 333, 364, 366</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (membership communications)</p>

D Group 1 - Kristine Leander
Discovery Summary

<p>RFP No. 15: Produce documents of Matthiesen's statements about Campbell, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.891–5.898. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to statements, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (statements)</p>
<p>RFP No. 16: Produce records of activities with Matthiesen to destabilize Campbell's relationship, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 18 (Tort of Outrage) as alleged in SAC ¶¶ 5.659–5.776 (substituting for FAC ¶ 1.1.17 et seq.). If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to relationship interference, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.891–5.898 (Matthiesen), pages 332–335</p>	<p>Kristine Leander, Lars Matthiesen, Elizabeth Campbell; January 2020–2025 (relationship interference)</p>
<p>RFP No. 17: Produce all communications between defendants about Campbell or this lawsuit, October 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 15 (Defamation) and COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to coordinated actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 332–334, 357–361, 366</p>	<p>Kristine Leander, Elizabeth Campbell, Gary Sund, Toene Hayes; October 2020–2025 (communications)</p>
<p>RFP No. 18: Produce documents related to the two \$25,000 payments post-retirement. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring financial motives. The request is narrowly tailored to payment records, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (payments)</p>

<p>RFP No. 19: Produce retirement-related settlement agreements with the Swedish Club. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to settlement agreements, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (settlements)</p>
<p>RFP No. 20: Produce severance agreements or payments from the Swedish Club. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring financial motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to severance details, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (severance)</p>
<p>RFP No. 21: Produce other post-termination agreements with the Swedish Club. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to agreements, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (agreements)</p>
<p>RFP No. 22: Produce additional settlement or retirement funds beyond the two \$25,000 payments. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring financial motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to additional funds, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361</p>	<p>Kristine Leander, Elizabeth Campbell, Swedish Club; Post-retirement 2020–2025 (funds)</p>

D Group 1 - Kristine Leander
Discovery Summary

RFP No. 23: Produce communications about post-retirement payments or agreements with the Swedish Club. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 17 (Tortious Interference with Employment Expectancy) as alleged in SAC ¶¶ 5.659–5.776, exploring motives. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to payment discussions, and any claim of undue burden must be substantiated under CR 26(c).	17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)	SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 357–361	Kristine Leander, Elizabeth Campbell, Swedish Club board; Post-retirement 2020–2025 (payment communications)
--	---	---	--