Interro	gatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
authored, or authored, the information, July 1, 2024, 26(b)(1) pern complete and authorship to	y No. 1: Identify the person(s) who whom you have knowledge of as having eletter, including their contact and the source of their knowledge, from to present. Legal Foundation: CR nits broad discovery. CR 33 requires swers. Seeks evidence of Letter's probe defendants' knowledge or in Leander's defamatory/outrageous ving wedge.	15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)	SAC ¶¶ 5.659–5.776 (Leander's defamation/harassment, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander, denunciation), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)	Kris Johansson, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)
any, in the au including any December 1, 26(b)(1) supp Letter's creat in Leander's	who. 2: Describe your involvement, if atthoring or sending of the Letter, communications or actions taken, from 2024, to present. Legal Foundation: CR ports discovery of defendants' role in tion/dissemination, probing complicity defamatory/outrageous actions to drive 3 mandates detailed answers.	15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)	SAC ¶¶ 5.659–5.776 (Leander's defamation/harassment, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)	Kris Johansson, Elizabeth Campbell; December 2024 (Letter drafting)
Kristine Lean membership 2020, to pres allows discov specificity. R	y No. 3: Describe any actions or plans by der to terminate Elizabeth Campbell's with the Swedish Club, from August 15, tent. Legal Foundation: CR 26(b)(1) very of interference facts. CR 33 requires elevant to Letter's exclusion claim, indants' knowledge or similar actions.	16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership	SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366	Kris Johansson, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting
negative stati Kristine Lean and persons present. Lega discovery of 0 33 requires s allegations, p	y No. 4: Identify all instances of gossip or ements about Elizabeth Campbell by der or others, including dates, locations, involved, from August 15, 2020, to al Foundation: CR 26(b)(1) supports defamatory/outrageous discussions. CR pecificity. Relevant to Letter's gossip probing defendants' knowledge or luct to expose complicity or conflicts.	15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation	SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.602–5.658 (Hayes' conduct), pages 327–329, 332–335, 357–361; Exhibit P-7 (page 467)	
December 17 Campbell an communicat 2021, to pres permits disco	y No. 5: State your knowledge of the 7, 2021, argument between Elizabeth d Lars Matthiesen, including any ions or observations, from January 1, sent. Legal Foundation: CR 26(b)(1) overy of incident details. CR 33 stailed answers. Relevant to Letter's lent claim, probing defendants'	15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)	SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander's role, including 5.775), ¶¶ 5.101–5.145 (board aggression), pages 332–335	Kris Johansson, Elizabeth Campbell, Lars Matthiesen, Kristine Leander; December 17, 2021 argument

awareness or role.

Interrogatory No. 6: Describe any actions you took or were aware of that contributed to Elizabeth Campbell's employment termination from the Swedish Club, from August 1, 2020, to present. Legal Foundation: CR 26(b)(1) allows discovery of termination facts. CR 33 requires specificity. Relevant to Letter's termination claim, probing defendants' involvement or knowledge of Leander's scheme.

17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC

SAC ¶¶ 5.174-5.177 (employment), ¶¶ 5.481-5.512 (hostile workplace), ¶¶ 5.602-5.658 (Hayes), ¶¶ 5.659-5.776 (Leander's termination, including 5.775), 14.04 Discrimination/Retaliation ¶¶ 5.785-5.864 (Sund/Leander), pages 327-329, 334, 357-361

Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; January 18, 2022 staff meeting

Interrogatory No. 7: Identify all decisions, discussions, or actions leading to Elizabeth Campbell's exclusion from Swedish Club membership, including dates and persons involved, from September 1, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of exclusion facts. CR 33 mandates detailed answers. Relevant to Letter's exclusion claim, probing defendants' role or knowledge.

16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract -Membership

SAC ¶¶ 5.18-5.52 (membership policies), ¶¶ 5.101-5.145 (board aggression), ¶¶ 5.659-5.776 (Leander's exclusion, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), pages 333, 364,

Kris Johansson, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting

Interrogatory No. 8: Identify all instances of membership terminations or exclusions of other Swedish Club members, including reasons and dates, from June 1, 2019, to present. Legal Foundation: CR 26(b)(1) allows discovery of exclusion patterns. CR 33 requires specificity. Relevant to public accommodation violations, probing club practices.

53: Public Accommodation, 56: Breach of Contract -Membership

SAC ¶¶ 5.18-5.52 (membership policies), ¶¶ 5.101-5.145 (board Kris Johansson, Kristine aggression), ¶¶ 5.659-5.776 (Leander, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), pages 364, 366

Leander, Swedish Club; June 2019-2025 (membership terminations)

Interrogatory No. 9: Describe any coordinated efforts or communications among defendants or others to terminate Elizabeth Campbell's employment or exclude her from membership, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) permits discovery of schemes. CR 33 requires detailed answers. Relevant to Letter's scheme allegation, probing defendants' complicity or conflicts.

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 Discrimination/Retaliation, 56: Breach of Contract -Membership

SAC ¶¶ 5.101-5.145 (board aggression), ¶¶ 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

Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; August 2020-2023 (scheme)

Interrogatory No. 10: Identify all witnesses to events described in the Letter, including their contact information and the specific events they witnessed, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) allows discovery of witness identities. CR 33 requires complete answers. Relevant to Letter's gossip, argument, termination, and exclusion claims, probing defendants' knowledge or involvement to drive wedge.

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), 50: SMC 14.04 Discrimination/Retaliation, 53: Public Accommodation, 56: Breach of Contract -Membership

SAC ¶¶ 5.659-5.776 (Leander's actions, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.18–5.52 (membership), ¶¶ Kris Johansson, Kristine 5.174-5.177 (employment), ¶¶ 5.481-5.512 (hostile workplace), ¶¶ 5.178-5.194 (public accommodation), ¶¶ 5.602-5.658 (Hayes), pages 327-329, 332-335, 357-361, 364, 366; Letter not in SAC

Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020-2025 (club events)

Interrogatory No. 11: Identify all facts supporting your denial of allegations in SAC Paragraph 5.659, regarding Kristine Leander's defamatory statements about Elizabeth Campbell, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of facts underlying Answer denials. CR 33 requires specificity. Relevant to probing defendant's basis for denying defamation claims.

None (Answer-related)

SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775); Answer, Dkt. Item No. 138, Paragraph 15 (denial of SAC ¶ 5.659, "lacks sufficient knowledge")

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (defamatory statements)

Interrogatory No. 12: Describe all communications you had with Kristine Leander regarding Elizabeth Campbell, from August 15, 2020, to present, as referenced in your denial of SAC Paragraph 5.660. Legal Foundation: CR 26(b)(1) permits discovery of communications supporting Answer denials. CR 33 mandates detailed answers. Relevant to probing defendant's knowledge of Leander's actions.

None (Answer-related)

SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775); Answer, Dkt. Item No. 138, Paragraph 16 (denial of SAC ¶ 5.660, "lacks sufficient knowledge")

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)

Interrogatory No. 13: Identify all documents supporting your denial of SAC Paragraph 5.785, regarding Gary Sund's involvement with Kristine Leander, from January 1, 2022, to present. Legal Foundation: CR 26(b)(1) supports discovery of documents underlying Answer denials. CR 33 requires specificity. Relevant to probing defendant's basis for denying Sund's actions.

None (Answer-related)

SAC ¶¶ 5.785–5.864 (Sund/Leander); Answer, Dkt. Item No. 138, Paragraph 20 (denial of SAC ¶ 5.785, "calls for legal conclusion")

Kris Johansson, Gary Sund, Kristine Leander; January 2022–2025 (Sund's involvement)

Interrogatory No. 14: State all facts supporting your affirmative defense of failure to state a claim, as asserted in the Answer, regarding SAC Paragraphs 5.101–5.145 (board aggression). Legal Foundation: CR 26(b)(1) permits discovery of facts supporting defenses. CR 33 mandates detailed answers. Relevant to probing legal basis of defense.

None (Answer-related)

SAC ¶¶ 5.101–5.145 (board aggression); Answer, Dkt. Item No. 138, Defense 4 (failure to state a claim)

Kris Johansson, Elizabeth Campbell, Swedish Club board; August 2020–2025 (board actions)

Interrogatory No. 15: Identify all witnesses supporting your denial of SAC Paragraph 5.174, regarding Elizabeth Campbell's employment termination, from March 1, 2021, to present. Legal Foundation: CR 26(b)(1) supports discovery of witness identities for Answer denials. CR 33 requires specificity. Relevant to probing termination facts.

None (Answer-related)

SAC ¶¶ 5.174–5.177 (employment); Answer, Dkt. Item No. 138, Paragraph 25 (denial of SAC ¶ 5.174, "lacks sufficient knowledge")

Kris Johansson, Elizabeth Campbell, Toene Hayes; March 2021–2025 (termination)

Interrogatory No. 16: Describe all communications with Swedish Club board members regarding Elizabeth Campbell's membership exclusion, from September 1, 2020, to present, as referenced in your denial of SAC Paragraph 5.18. Legal Foundation: CR 26(b)(1) permits discovery of communications supporting Answer denials. CR 33 mandates detailed answers. Relevant to membership exclusion.

None (Answer-related)

SAC ¶¶ 5.18–5.52 (membership policies); Answer, Dkt. Item No. 138, Paragraph 30 (denial of SAC ¶ 5.18, "calls for legal conclusion")

Kris Johansson, Elizabeth Campbell, Swedish Club board; September 2020–2025 (membership exclusion)

Interrogatory No. 17: Identify all facts supporting your denial of SAC Paragraph 5.481, regarding hostile work environment, from August 1, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of facts underlying Answer denials. CR 33 requires specificity. Relevant to hostile workplace claims.

None (Answer-related)

SAC ¶¶ 5.481-5.512 (hostile workplace); Answer, Dkt. Item No. 138, Paragraph 35 (denial of SAC ¶ 5.481, "lacks sufficient knowledge")

Kris Johansson, Elizabeth Campbell, Kristine Leander; August 2020-2025 (workplace harassment)

Interrogatory No. 18: State all reasons why you believe Elizabeth Campbell's claims in SAC Paragraphs 5.602-5.658 (Hayes' conduct) are speculative, as asserted in your affirmative defense. Legal Foundation: CR 26(b)(1) permits discovery of reasons supporting defenses. CR 33 mandates detailed answers. Relevant to probing defense basis.

None (Answer-related)

SAC ¶¶ 5.602-5.658 (Hayes' conduct); Answer, Dkt. Item No. 138, Defense 5 (speculative damages)

Kris Johansson, Elizabeth Campbell, Toene Hayes; 2022-2023 (Hayes' statements)

Interrogatory No. 19: Identify all documents supporting your denial of SAC Paragraph 5.891, regarding the December 17, 2021, argument, from December 17, 2021, to present. Legal Foundation: CR 26(b)(1) supports discovery of documents underlying Answer denials. CR 33 requires specificity. Relevant to argument facts.

None (Answer-related)

SAC ¶¶ 5.891-5.898 (Matthiesen, argument); Answer, Dkt. Item No. 138, Paragraph 40 (denial of SAC ¶ 5.891, "lacks sufficient knowledge")

Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument

Interrogatory No. 20: Describe all communications with Langdon Miller regarding the Letter, from July 1, 2024, to present, as referenced in your denial of SAC Paragraph 5.659. Legal Foundation: CR 26(b)(1) permits discovery of communications supporting Answer denials. CR 33 mandates detailed answers. Relevant to Letter's authorship.

None (Answer-related)

SAC ¶¶ 5.659-5.776 (Leander's defamation, including 5.775); Answer, Dkt. Item No. 138, Paragraph 15 (denial of SAC ¶ 5.659, "lacks sufficient knowledge")

Kris Johansson, Langdon Miller, Kristine Leander; July 2024-2025 (Letter communications)

Interrogatory No. 21: Identify all facts supporting your affirmative defense of statute of limitations for SAC Paragraphs 5.659-5.776, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) supports None (Answer-related) discovery of facts supporting defenses. CR 33 mandates detailed answers. Relevant to probing defense basis.

SAC ¶¶ 5.659-5.776 (Leander's defamation, including 5.775); Answer, Dkt. Item No. 138, Defense 6 (statute of limitations)

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020-2025 (defamation claims)

Interrogatory No. 22: State all reasons why you believe Elizabeth Campbell failed to mitigate damages, as asserted in your affirmative defense, regarding SAC Paragraphs 5.174-5.177. Legal Foundation: CR 26(b)(1) permits discovery of reasons supporting defenses. CR 33 mandates detailed answers. Relevant to mitigation defense.

None (Answer-related)

SAC ¶¶ 5.174-5.177 (employment); Answer, Dkt. Item No. 138, Defense 7 (failure to mitigate)

Kris Johansson, Elizabeth Campbell; March 2021-2025 (employment damages)

Interrogatory No. 23: Identify all witnesses supporting your denial of SAC Paragraph 5.785, SAC ¶¶ 5.785-5.864 Kris Johansson, Gary Sund, regarding Gary Sund's involvement with Kristine (Sund/Leander); Answer, Dkt. Kristine Leander; January Leander, from January 1, 2022, to present. Legal None (Answer-related) Item No. 138, Paragraph 20 2022-2025 (Sund's Foundation: CR 26(b)(1) supports discovery of (denial of SAC ¶ 5.785, "calls for involvement) witness identities for Answer denials. CR 33 requires legal conclusion") specificity. Relevant to Sund's actions. Interrogatory No. 24: Describe all communications with Sharon Lucas regarding Elizabeth Campbell's SAC ¶¶ 5.174-5.177 employment termination, from March 1, 2021, to Kris Johansson, Sharon Lucas, (employment); Answer, Dkt. present, as referenced in your denial of SAC None (Answer-related) Item No. 138, Paragraph 25 Elizabeth Campbell; March Paragraph 5.174. Legal Foundation: CR 26(b)(1) (denial of SAC ¶ 5.174, "lacks 2021-2025 (termination) permits discovery of communications supporting sufficient knowledge") Answer denials. CR 33 mandates detailed answers. Relevant to termination facts. Interrogatory No. 25: Identify all facts supporting SAC ¶¶ 5.101-5.145 (board your denial of SAC Paragraph 5.101, regarding board Kris Johansson, Elizabeth aggression); Answer, Dkt. Item aggression, from August 15, 2020, to present. Legal Campbell, Swedish Club board; None (Answer-related) No. 138, Paragraph 12 (denial of Foundation: CR 26(b)(1) supports discovery of facts August 2020-2025 (board SAC ¶ 5.101, "lacks sufficient underlying Answer denials. CR 33 requires actions) knowledge") specificity. Relevant to board actions. Interrogatory No. 26: State all reasons why you believe Elizabeth Campbell's claims in SAC Kris Johansson, Elizabeth Paragraphs 5.481-5.512 (hostile workplace) are not SAC ¶¶ 5.481-5.512 (hostile actionable, as asserted in your affirmative defense. workplace); Answer, Dkt. Item Campbell, Kristine Leander; None (Answer-related) Legal Foundation: CR 26(b)(1) permits discovery of No. 138, Defense 4 (failure to August 2020-2025 (workplace reasons supporting defenses. CR 33 mandates state a claim) harassment) detailed answers. Relevant to hostile workplace defense. Interrogatory No. 27: Identify all documents supporting your denial of SAC Paragraph 5.18, SAC $\P\P$ 5.18-5.52 (membership Kris Johansson, Elizabeth regarding membership policies, from September 1, policies); Answer, Dkt. Item No. Campbell, Swedish Club; 2020, to present. Legal Foundation: CR 26(b)(1) None (Answer-related) 138, Paragraph 30 (denial of September 2020-2025 supports discovery of documents underlying Answer SAC ¶ 5.18, "calls for legal (membership policies) denials. CR 33 requires specificity. Relevant to conclusion") membership policies.

authorship.

Interrogatory No. 28: Describe all communications with the Swedish Club executive director regarding

referenced in your denial of SAC Paragraph 5.659.

Legal Foundation: CR 26(b)(1) permits discovery of

communications supporting Answer denials. CR 33

mandates detailed answers. Relevant to Letter's

the Letter, from July 1, 2024, to present, as

None (Answer-related)

SAC ¶¶ 5.659-5.776 (Leander's

Kris Johansson, Kristine Leander, Elizabeth Campbell;

July 2024-2025 (Letter

communications)

defamation, including 5.775);

Paragraph 15 (denial of SAC ¶

Answer, Dkt. Item No. 138,

5.659, "lacks sufficient

knowledge")

Interrogatory No. 29: Identify all facts supporting your denial of SAC Paragraph 5.602, regarding Toene Hayes' defamatory statements, from January 1, 2022, to present. Legal Foundation: CR 26(b)(1) supports discovery of facts underlying Answer denials. CR 33 requires specificity. Relevant to Hayes' conduct.

None (Answer-related)

SAC ¶¶ 5.602-5.658 (Hayes' conduct); Answer, Dkt. Item No. Kris Johansson, Elizabeth 138, Paragraph 45 (denial of SAC ¶ 5.602, "lacks sufficient knowledge")

Campbell, Toene Hayes; January 2022-2023 (Hayes' statements)

Interrogatory No. 30: State all reasons why you believe Elizabeth Campbell's claims in SAC Paragraphs 5.178-5.194 (public accommodation) are time-barred, as asserted in your affirmative defense. Legal Foundation: CR 26(b)(1) permits discovery of reasons supporting defenses. CR 33 mandates detailed answers. Relevant to public accommodation defense.

None (Answer-related)

SAC ¶¶ 5.178-5.194 (public accommodation); Answer, Dkt. Item No. 138, Defense 6 (statute August 2020-2025 (public of limitations)

Kris Johansson, Elizabeth Campbell, Swedish Club; accommodation)

Interrogatory No. 31: Identify all witnesses supporting your denial of SAC Paragraph 5.659, regarding Kristine Leander's defamatory statements, from August 15, 2020, to present. Legal Foundation: None (Answer-related) CR 26(b)(1) supports discovery of witness identities for Answer denials. CR 33 requires specificity. Relevant to defamation claims.

SAC ¶¶ 5.659-5.776 (Leander's defamation, including 5.775); Answer, Dkt. Item No. 138, Paragraph 15 (denial of SAC ¶ 5.659, "lacks sufficient knowledge")

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020-2025 (defamatory statements)

Interrogatory No. 32: Describe all communications with Gary Sund regarding Elizabeth Campbell's membership exclusion, from September 1, 2020, to present, as referenced in your denial of SAC Paragraph 5.18. Legal Foundation: CR 26(b)(1) permits discovery of communications supporting Answer denials. CR 33 mandates detailed answers. Relevant to membership exclusion.

None (Answer-related)

SAC ¶¶ 5.18-5.52 (membership policies); Answer, Dkt. Item No. 138, Paragraph 30 (denial of SAC ¶ 5.18, "calls for legal conclusion")

Kris Johansson, Gary Sund, Elizabeth Campbell; September 2020-2025 (membership exclusion)

Interrogatory No. 33: Identify all facts supporting your denial of SAC Paragraph 5.891, regarding the December 17, 2021, argument, from December 17, 2021, to present. Legal Foundation: CR 26(b)(1) supports discovery of facts underlying Answer denials. CR 33 requires specificity. Relevant to argument facts.

None (Answer-related)

SAC ¶¶ 5.891-5.898 (Matthiesen, argument); Answer, Dkt. Item No. 138, Paragraph 40 (denial of SAC ¶ 5.891, "lacks sufficient knowledge")

Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument

RFP No. 1: Produce all documents related to the creation, drafting, or sending of the Letter, from December 1, 2024, to present. Legal Foundation: CR 15: Defamation, 18: Tort of 26(b)(1) and CR 34 permit production of relevant documents. Relevant to Leander's defamatory/outrageous actions, probing defendants' involvement to drive wedge.

Outrage (IIED), 19: Tort of Outrage (NIED)

SAC ¶¶ 5.659-5.776 (Leander's actions, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), ¶¶ Kris Johansson, Elizabeth 5.101-5.145 (board aggression), Campbell; December 2024 pages 332-335; Letter not in (Letter creation) SAC, tied to Leander's gossip (¶¶ 5.659-5.670)

RFP No. 2: Produce all communications by Kristine Leander mentioning Elizabeth Campbell, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of interference documents. Relevant to interference and workplace harassment, probing defendants' knowledge.

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

SAC $\P\P$ 5.18–5.52 (membership policies), ¶¶ 5.659-5.776 (Leander's actions, including 5.775), ¶¶ 5.101-5.145 (board aggression), ¶¶ 5.785-5.864 (Sund/Leander), pages 333-334, 357-361, 366

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020-2025 (communications)

RFP No. 3: Produce all documents reflecting gossip or negative statements about Elizabeth Campbell by Kristine Leander or others, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to Letter's gossip allegations, probing defendants' complicity or conflicts.

15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: ¶¶ 5.481-5.512 (hostile Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation

SAC ¶¶ 5.659-5.776 (Leander's defamation, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), ¶¶ Kris Johansson, Kristine 5.101-5.145 (board aggression), Leander, Elizabeth Campbell, workplace), $\P\P$ 5.602-5.658 (Hayes), pages 327-329, 332-335, 357-361; Exhibit P-7 (page 467)

Toene Hayes, Sarah Alaimo; August 2020-2025 (gossip records)

RFP No. 4: Produce all records related to the December 17, 2021, argument between Elizabeth Campbell and Lars Matthiesen, from December 17, 2021, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of incident documents. Relevant to Letter's public argument claim.

15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)

SAC ¶¶ 5.891-5.898 (Matthiesen, argument), ¶¶ 5.659-5.776 (Leander's role, including 5.775), ¶¶ 5.101-5.145 (board aggression), pages 332-335

Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument

RFP No. 5: Produce all records related to Elizabeth Campbell's employment termination from the Swedish Club, from March 1, 2021, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of termination documents. Relevant to Letter's termination claim, probing defendants' role.

17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation

SAC ¶¶ 5.174-5.177 (employment), ¶¶ 5.481-5.512 (hostile workplace), ¶¶ 5.602-5.658 (Hayes), ¶¶ 5.659-5.776 (Leander's termination, including 5.775), pages 327-329, 334, 357-361

Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; March 2021-2025 (termination records)

RFP No. 6: Produce all records related to Elizabeth Campbell's membership exclusion from the Swedish 16: Tortious Interference with Club, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of exclusion documents. Relevant to Letter's exclusion claim, probing defendants' involvement.

Contract-Membership, 53: Public Accommodation, 56: Breach of Contract -Membership

SAC $\P\P$ 5.18-5.52 (membership policies), ¶¶ 5.101-5.145 (board aggression), ¶¶ 5.659-5.776 (Leander's exclusion, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), pages 333, 364

Kris Johansson, Kristine Leander, Elizabeth Campbell, Sharon Lucas; August 2020-2025 (exclusion records) RFP No. 7: Produce all documents evidencing any scheme or plan to terminate Elizabeth Campbell's employment or exclude her from membership, from December 1, 2021, to present. Legal Foundation: CR VII), 46: Hostile Work 26(b)(1) and CR 34 support production of scheme documents. Relevant to Letter's scheme allegation, probing defendants' complicity.

16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title (Leander's scheme, including Environment (WLAD), 50: SMC Discrimination/Retaliation, 56: Breach of Contract -Membership

SAC ¶¶ 5.101-5.145 (board aggression), ¶¶ 5.659-5.776 5.775), ¶¶ 5.785-5.864 (Hayes), pages 327-329, 333-334, 357-361, 366

Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; (Sund/Leander), ¶¶ 5.602-5.658 December 2021-2025 (scheme records)

RFP No. 8: Produce all communications between defendants discussing Elizabeth Campbell or the claims in this lawsuit, from October 1, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of coordinated communications. Relevant to multiple COAs, probing conflicts.

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, 39-41, 43-44, 47, 52-54: Discrimination, Retaliation, Public Accommodation, 56: Breach of Contract -Membership

SAC ¶¶ 5.101-5.145 (board aggression), ¶¶ 5.659-5.776 (Leander, including 5.775), ¶¶ 5.785-5.864 (Sund/Leander), ¶¶ Miller; October 2020-2025 5.602-5.658 (Hayes), pages 327-329, 332-364, 366

Kris Johansson, Kristine Leander, Sharon Lucas, Langdon (communications)

RFP No. 9: Produce all documents supporting your denial of SAC Paragraph 5.659, regarding Kristine Leander's defamatory statements, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents supporting Answer denials. Relevant to defamation claims.

None (Answer-related)

SAC ¶¶ 5.659-5.776 (Leander's defamation, including 5.775); Answer, Dkt. Item No. 138, Paragraph 15 (denial of SAC ¶ 5.659, "lacks sufficient knowledge")

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020-2025 (defamatory statements)

RFP No. 10: Produce all communications with Kristine Leander regarding Elizabeth Campbell, from August 15, 2020, to present, as referenced in your denial of SAC Paragraph 5.660. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications supporting Answer denials. Relevant to Leander's actions.

None (Answer-related)

SAC ¶¶ 5.659-5.776 (Leander's actions, including 5.775); Answer, Dkt. Item No. 138, Paragraph 16 (denial of SAC ¶ 5.660, "lacks sufficient knowledge")

Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020-2025 (communications)

RFP No. 11: Produce all documents supporting your denial of SAC Paragraph 5.785, regarding Gary Sund's involvement with Kristine Leander, from January 1, 2022, to present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents supporting Answer denials. Relevant to Sund's actions.

None (Answer-related)

SAC ¶¶ 5.785-5.864 (Sund/Leander); Answer, Dkt. Item No. 138, Paragraph 20 (denial of SAC ¶ 5.785, "calls for legal conclusion")

Kris Johansson, Gary Sund, Kristine Leander; January 2022-2025 (Sund's involvement)

RFP No. 12: Produce all documents supporting your affirmative defense of failure to state a claim, as SAC ¶¶ 5.101-5.145 (board Kris Johansson, Elizabeth asserted in the Answer, regarding SAC Paragraphs aggression); Answer, Dkt. Item Campbell, Swedish Club board; 5.101–5.145 (board aggression). Legal Foundation: None (Answer-related) No. 138, Defense 4 (failure to August 2020-2025 (board CR 26(b)(1) and CR 34 permit production of state a claim) actions) documents supporting defenses. Relevant to defense basis. RFP No. 13: Produce all documents supporting your SAC ¶¶ 5.174-5.177 denial of SAC Paragraph 5.174, regarding Elizabeth Kris Johansson, Elizabeth (employment); Answer, Dkt. Campbell's employment termination, from March 1, None (Answer-related) Item No. 138, Paragraph 25 Campbell, Toene Hayes; March 2021, to present. Legal Foundation: CR 26(b)(1) and (denial of SAC ¶ 5.174, "lacks 2021-2025 (termination) CR 34 permit production of documents supporting sufficient knowledge") Answer denials. Relevant to termination facts. RFP No. 14: Produce all communications with Swedish Club board members regarding Elizabeth SAC $\P\P$ 5.18-5.52 (membership Campbell's membership exclusion, from September Kris Johansson, Elizabeth policies); Answer, Dkt. Item No. 1, 2020, to present, as referenced in your denial of Campbell, Swedish Club board; None (Answer-related) 138, Paragraph 30 (denial of SAC Paragraph 5.18. Legal Foundation: CR 26(b)(1) September 2020-2025 SAC ¶ 5.18, "calls for legal and CR 34 permit production of communications (membership exclusion) conclusion") supporting Answer denials. Relevant to membership exclusion. RFP No. 15: Produce all documents supporting your SAC ¶¶ 5.481-5.512 (hostile Kris Johansson, Elizabeth denial of SAC Paragraph 5.481, regarding hostile workplace); Answer, Dkt. Item work environment, from August 1, 2020, to present. Campbell, Kristine Leander; None (Answer-related) No. 138, Paragraph 35 (denial of Legal Foundation: CR 26(b)(1) and CR 34 permit August 2020-2025 (workplace SAC ¶ 5.481, "lacks sufficient production of documents supporting Answer denials. harassment) knowledge") Relevant to hostile workplace claims. RFP No. 16: Produce all documents supporting your affirmative defense of speculative damages, as SAC ¶¶ 5.602-5.658 (Hayes' asserted in the Answer, regarding SAC Paragraphs Kris Johansson, Elizabeth conduct); Answer, Dkt. Item No. 5.602-5.658 (Hayes' conduct). Legal Foundation: None (Answer-related) Campbell, Toene Hayes; 138, Defense 5 (speculative CR 26(b)(1) and CR 34 permit production of 2022-2023 (Hayes' statements) damages) documents supporting defenses. Relevant to damages defense. RFP No. 17: Produce all documents supporting your SAC ¶¶ 5.891-5.898 denial of SAC Paragraph 5.891, regarding the (Matthiesen, argument): Kris Johansson, Elizabeth December 17, 2021, argument, from December 17, Answer, Dkt. Item No. 138,

Paragraph 40 (denial of SAC ¶

5.891, "lacks sufficient

knowledge")

Campbell, Lars Matthiesen;

December 17, 2021 argument

None (Answer-related)

2021, to present. Legal Foundation: CR 26(b)(1) and

CR 34 permit production of documents supporting

Answer denials. Relevant to argument facts.

RFP No. 18: Produce all communications with
Langdon Miller regarding the Letter, from July 1,
2024, to present, as referenced in your denial of SAC
Paragraph 5.659. Legal Foundation: CR 26(b)(1) and None (Answer-related)
CR 34 permit production of communications
supporting Answer denials. Relevant to Letter's
authorship.

SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775); Answer, Dkt. Item No. 138, Paragraph 15 (denial of SAC ¶ 5.659, "lacks sufficient knowledge")

Kris Johansson, Langdon Miller, Kristine Leander; July 2024–2025 (Letter communications)