

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Identify the person(s) who authored, or whom you have knowledge of as having authored, the Letter, including their contact information, and the source of their knowledge, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) permits broad discovery. CR 33 requires complete answers. Seeks evidence of Letter's authorship to probe defendants' knowledge or involvement in Leander's defamatory/outrageous conduct, driving wedge.</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, denunciation), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p>	<p>Kris Johansson, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)</p>
<p>Interrogatory No. 2: Describe your involvement, if any, in the authoring or sending of the Letter, including any communications or actions taken, from December 1, 2024, to present. Legal Foundation: CR 26(b)(1) supports discovery of defendants' role in Letter's creation/dissemination, probing complicity in Leander's defamatory/outrageous actions to drive wedge. CR 33 mandates detailed 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), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p>	<p>Kris Johansson, Elizabeth Campbell; December 2024 (Letter drafting)</p>
<p>Interrogatory No. 3: Describe any actions or plans by Kristine Leander to terminate Elizabeth Campbell's membership with the Swedish Club, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) allows discovery of interference facts. CR 33 requires specificity. Relevant to Letter's exclusion claim, probing defendants' knowledge or similar actions.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>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</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting</p>
<p>Interrogatory No. 4: Identify all instances of gossip or negative statements about Elizabeth Campbell by Kristine Leander or others, including dates, locations, and persons involved, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of defamatory/outrageous discussions. CR 33 requires specificity. Relevant to Letter's gossip allegations, probing defendants' knowledge or parallel conduct to expose complicity or conflicts.</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), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>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)</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2023 (club discussions)</p>
<p>Interrogatory No. 5: State your knowledge of the December 17, 2021, argument between Elizabeth Campbell and Lars Matthiesen, including any communications or observations, from January 1, 2021, to present. Legal Foundation: CR 26(b)(1) permits discovery of incident details. CR 33 mandates detailed answers. Relevant to Letter's public argument claim, probing defendants' awareness or role.</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), ¶¶ 5.101–5.145 (board aggression), pages 332–335</p>	<p>Kris Johansson, Elizabeth Campbell, Lars Matthiesen, Kristine Leander; December 17, 2021 argument</p>

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 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), ¶¶ 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, 366

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 aggression), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 364, 366

Kris Johansson, Kristine 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 14.04 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), ¶¶ 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

Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020–2025 (club events)

<p>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.</p>	None (Answer-related)	<p>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")</p> <p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (defamatory statements)</p>
<p>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.</p>	None (Answer-related)	<p>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")</p> <p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.785–5.864 (Sund/Leander); Answer, Dkt. Item No. 138, Paragraph 20 (denial of SAC ¶ 5.785, "calls for legal conclusion")</p> <p>Kris Johansson, Gary Sund, Kristine Leander; January 2022–2025 (Sund's involvement)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.101–5.145 (board aggression); Answer, Dkt. Item No. 138, Defense 4 (failure to state a claim)</p> <p>Kris Johansson, Elizabeth Campbell, Swedish Club board; August 2020–2025 (board actions)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.174–5.177 (employment); Answer, Dkt. Item No. 138, Paragraph 25 (denial of SAC ¶ 5.174, "lacks sufficient knowledge")</p> <p>Kris Johansson, Elizabeth Campbell, Toene Hayes; March 2021–2025 (termination)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.18–5.52 (membership policies); Answer, Dkt. Item No. 138, Paragraph 30 (denial of SAC ¶ 5.18, "calls for legal conclusion")</p> <p>Kris Johansson, Elizabeth Campbell, Swedish Club board; September 2020–2025 (membership exclusion)</p>

<p>Interrogatory No. 17: Identify all facts supporting your denial of SAC Paragraph 5.481, regarding hostile work environment, from August 1, 2020, to present.</p> <p>Legal Foundation: CR 26(b)(1) supports discovery of facts underlying Answer denials. CR 33 requires specificity. Relevant to hostile workplace claims.</p>	None (Answer-related)	<p>SAC ¶¶ 5.481–5.512 (hostile workplace); Answer, Dkt. Item No. 138, Paragraph 35 (denial of SAC ¶ 5.481, “lacks sufficient knowledge”)</p>	<p>Kris Johansson, Elizabeth Campbell, Kristine Leander; August 2020–2025 (workplace harassment)</p>
<p>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.</p> <p>Legal Foundation: CR 26(b)(1) permits discovery of reasons supporting defenses. CR 33 mandates detailed answers. Relevant to probing defense basis.</p>	None (Answer-related)	<p>SAC ¶¶ 5.602–5.658 (Hayes’ conduct); Answer, Dkt. Item No. 138, Defense 5 (speculative damages)</p>	<p>Kris Johansson, Elizabeth Campbell, Toene Hayes; 2022–2023 (Hayes’ statements)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument); Answer, Dkt. Item No. 138, Paragraph 40 (denial of SAC ¶ 5.891, “lacks sufficient knowledge”)</p>	<p>Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>
<p>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.</p>	None (Answer-related)	<p>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”)</p>	<p>Kris Johansson, Langdon Miller, Kristine Leander; July 2024–2025 (Letter communications)</p>
<p>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 discovery of facts supporting defenses. CR 33 mandates detailed answers. Relevant to probing defense basis.</p>	None (Answer-related)	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775); Answer, Dkt. Item No. 138, Defense 6 (statute of limitations)</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (defamation claims)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.174–5.177 (employment); Answer, Dkt. Item No. 138, Defense 7 (failure to mitigate)</p>	<p>Kris Johansson, Elizabeth Campbell; March 2021–2025 (employment damages)</p>

<p>Interrogatory No. 23: Identify all witnesses 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 witness identities for Answer denials. CR 33 requires specificity. Relevant to Sund's actions.</p>	None (Answer-related)	<p>SAC ¶¶ 5.785–5.864 (Sund/Leander); Answer, Dkt. Item No. 138, Paragraph 20 (denial of SAC ¶ 5.785, "calls for legal conclusion")</p>	<p>Kris Johansson, Gary Sund, Kristine Leander; January 2022–2025 (Sund's involvement)</p>
<p>Interrogatory No. 24: Describe all communications with Sharon Lucas regarding Elizabeth Campbell's employment termination, from March 1, 2021, to present, as referenced in your denial of SAC Paragraph 5.174. Legal Foundation: CR 26(b)(1) permits discovery of communications supporting Answer denials. CR 33 mandates detailed answers. Relevant to termination facts.</p>	None (Answer-related)	<p>SAC ¶¶ 5.174–5.177 (employment); Answer, Dkt. Item No. 138, Paragraph 25 (denial of SAC ¶ 5.174, "lacks sufficient knowledge")</p>	<p>Kris Johansson, Sharon Lucas, Elizabeth Campbell; March 2021–2025 (termination)</p>
<p>Interrogatory No. 25: Identify all facts supporting your denial of SAC Paragraph 5.101, regarding board aggression, 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 board actions.</p>	None (Answer-related)	<p>SAC ¶¶ 5.101–5.145 (board aggression); Answer, Dkt. Item No. 138, Paragraph 12 (denial of SAC ¶ 5.101, "lacks sufficient knowledge")</p>	<p>Kris Johansson, Elizabeth Campbell, Swedish Club board; August 2020–2025 (board actions)</p>
<p>Interrogatory No. 26: State all reasons why you believe Elizabeth Campbell's claims in SAC Paragraphs 5.481–5.512 (hostile workplace) are not actionable, 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 hostile workplace defense.</p>	None (Answer-related)	<p>SAC ¶¶ 5.481–5.512 (hostile workplace); Answer, Dkt. Item No. 138, Defense 4 (failure to state a claim)</p>	<p>Kris Johansson, Elizabeth Campbell, Kristine Leander; August 2020–2025 (workplace harassment)</p>
<p>Interrogatory No. 27: Identify all documents supporting your denial of SAC Paragraph 5.18, regarding membership policies, from September 1, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of documents underlying Answer denials. CR 33 requires specificity. Relevant to membership policies.</p>	None (Answer-related)	<p>SAC ¶¶ 5.18–5.52 (membership policies); Answer, Dkt. Item No. 138, Paragraph 30 (denial of SAC ¶ 5.18, "calls for legal conclusion")</p>	<p>Kris Johansson, Elizabeth Campbell, Swedish Club; September 2020–2025 (membership policies)</p>
<p>Interrogatory No. 28: Describe all communications with the Swedish Club executive director 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.</p>	None (Answer-related)	<p>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")</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; July 2024–2025 (Letter communications)</p>

<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.602–5.658 (Hayes' conduct); Answer, Dkt. Item No. 138, Paragraph 45 (denial of SAC ¶ 5.602, "lacks sufficient knowledge")</p> <p>Kris Johansson, Elizabeth Campbell, Toene Hayes; January 2022–2023 (Hayes' statements)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.178–5.194 (public accommodation); Answer, Dkt. Item No. 138, Defense 6 (statute of limitations)</p> <p>Kris Johansson, Elizabeth Campbell, Swedish Club; August 2020–2025 (public accommodation)</p>
<p>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: CR 26(b)(1) supports discovery of witness identities for Answer denials. CR 33 requires specificity. Relevant to defamation claims.</p>	None (Answer-related)	<p>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")</p> <p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (defamatory statements)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.18–5.52 (membership policies); Answer, Dkt. Item No. 138, Paragraph 30 (denial of SAC ¶ 5.18, "calls for legal conclusion")</p> <p>Kris Johansson, Gary Sund, Elizabeth Campbell; September 2020–2025 (membership exclusion)</p>
<p>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.</p>	None (Answer-related)	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument); Answer, Dkt. Item No. 138, Paragraph 40 (denial of SAC ¶ 5.891, "lacks sufficient knowledge")</p> <p>Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>
<p>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 26(b)(1) and CR 34 permit production of relevant documents. Relevant to Leander's defamatory/outrageous actions, probing defendants' involvement to drive wedge.</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), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p> <p>Kris Johansson, Elizabeth Campbell; December 2024 (Letter creation)</p>

<p>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.</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 ¶¶ 5.18–5.52 (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</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>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.</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), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>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), pages 327–329, 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; Toene Hayes, Sarah Alaimo; August 2020–2025 (gossip records)</p>
<p>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.</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), ¶¶ 5.101–5.145 (board aggression), pages 332–335</p>	<p>Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>
<p>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.</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), ¶¶ 5.602–5.658 (Hayes), ¶¶ 5.659–5.776 (Leander's termination, including 5.775), pages 327–329, 334, 357–361</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; Toene Hayes, Sarah Alaimo; March 2021–2025 (termination records)</p>
<p>RFP No. 6: Produce all records related to Elizabeth Campbell's membership exclusion from the Swedish 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.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>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, 366</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell, Sharon Lucas; August 2020–2025 (exclusion records)</p>

<p>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 26(b)(1) and CR 34 support production of scheme documents. Relevant to Letter's scheme allegation, probing defendants' complicity.</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 ¶¶ 5.101–5.145 (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</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; December 2021–2025 (scheme records)</p>
<p>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.</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, 39–41, 43–44, 47, 52–54: Discrimination, Retaliation, Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 332–364, 366</p>	<p>Kris Johansson, Kristine Leander, Sharon Lucas, Langdon Miller; October 2020–2025 (communications)</p>
<p>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.</p>	<p>None (Answer-related)</p>	<p>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")</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (defamatory statements)</p>
<p>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.</p>	<p>None (Answer-related)</p>	<p>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")</p>	<p>Kris Johansson, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>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.</p>	<p>None (Answer-related)</p>	<p>SAC ¶¶ 5.785–5.864 (Sund/Leander); Answer, Dkt. Item No. 138, Paragraph 20 (denial of SAC ¶ 5.785, "calls for legal conclusion")</p>	<p>Kris Johansson, Gary Sund, Kristine Leander; January 2022–2025 (Sund's involvement)</p>

<p>RFP No. 12: Produce all documents 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) and CR 34 permit production of documents supporting defenses. Relevant to defense basis.</p>	None (Answer-related)	<p>SAC ¶¶ 5.101–5.145 (board aggression); Answer, Dkt. Item No. 138, Defense 4 (failure to state a claim)</p>	<p>Kris Johansson, Elizabeth Campbell, Swedish Club board; August 2020–2025 (board actions)</p>
<p>RFP No. 13: Produce all documents 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) and CR 34 permit production of documents supporting Answer denials. Relevant to termination facts.</p>	None (Answer-related)	<p>SAC ¶¶ 5.174–5.177 (employment); Answer, Dkt. Item No. 138, Paragraph 25 (denial of SAC ¶ 5.174, “lacks sufficient knowledge”)</p>	<p>Kris Johansson, Elizabeth Campbell, Toene Hayes; March 2021–2025 (termination)</p>
<p>RFP No. 14: Produce 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) and CR 34 permit production of communications supporting Answer denials. Relevant to membership exclusion.</p>	None (Answer-related)	<p>SAC ¶¶ 5.18–5.52 (membership policies); Answer, Dkt. Item No. 138, Paragraph 30 (denial of SAC ¶ 5.18, “calls for legal conclusion”)</p>	<p>Kris Johansson, Elizabeth Campbell, Swedish Club board; September 2020–2025 (membership exclusion)</p>
<p>RFP No. 15: Produce all documents supporting your denial of SAC Paragraph 5.481, regarding hostile work environment, from August 1, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents supporting Answer denials. Relevant to hostile workplace claims.</p>	None (Answer-related)	<p>SAC ¶¶ 5.481–5.512 (hostile workplace); Answer, Dkt. Item No. 138, Paragraph 35 (denial of SAC ¶ 5.481, “lacks sufficient knowledge”)</p>	<p>Kris Johansson, Elizabeth Campbell, Kristine Leander; August 2020–2025 (workplace harassment)</p>
<p>RFP No. 16: Produce all documents supporting your affirmative defense of speculative damages, as asserted in the Answer, regarding SAC Paragraphs 5.602–5.658 (Hayes’ conduct). Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents supporting defenses. Relevant to damages defense.</p>	None (Answer-related)	<p>SAC ¶¶ 5.602–5.658 (Hayes’ conduct); Answer, Dkt. Item No. 138, Defense 5 (speculative damages)</p>	<p>Kris Johansson, Elizabeth Campbell, Toene Hayes; 2022–2023 (Hayes’ statements)</p>
<p>RFP No. 17: Produce 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) and CR 34 permit production of documents supporting Answer denials. Relevant to argument facts.</p>	None (Answer-related)	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument); Answer, Dkt. Item No. 138, Paragraph 40 (denial of SAC ¶ 5.891, “lacks sufficient knowledge”)</p>	<p>Kris Johansson, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>

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)