

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p><b>Interrogatory No. 1:</b> 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. <b>Legal Foundation:</b> 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 (gossip, scheme), potentially turning defendants against each other.</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>Langdon Miller, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)</p>
<p><b>Interrogatory No. 2:</b> 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. <b>Legal Foundation:</b> 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>Langdon Miller, Elizabeth Campbell; December 2024 (Letter drafting)</p>
<p><b>Interrogatory No. 3:</b> Describe any actions or plans by Kristine Leander to terminate Elizabeth Campbell's membership with the Swedish Club, from August 15, 2020, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting</p>

<p><b>Interrogatory No. 4:</b> 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. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2023 (club discussions)</p>
<p><b>Interrogatory No. 5:</b> 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. <b>Legal Foundation:</b> 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>Langdon Miller, Elizabeth Campbell, Lars Matthiesen, Kristine Leander; December 17, 2021 argument</p>
<p><b>Interrogatory No. 6:</b> 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. <b>Legal Foundation:</b> 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.</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), ¶¶ 5.785–5.864 (Sund/Leander), pages 327–329, 334, 357–361</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; January 18, 2022 staff meeting</p>

<p><b>Interrogatory No. 7:</b> 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. <b>Legal Foundation:</b> 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.</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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting</p>
<p><b>Interrogatory No. 8:</b> Identify all instances of membership terminations or exclusions of other Swedish Club members, including reasons and dates, from June 1, 2019, to present. <b>Legal Foundation:</b> CR 26(b)(1) allows discovery of exclusion patterns. CR 33 requires specificity. Relevant to public accommodation violations, probing club practices.</p>	<p>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, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 364, 366</p>	<p>Langdon Miller, Kristine Leander, Swedish Club; June 2019–2025 (membership terminations)</p>
<p><b>Interrogatory No. 9:</b> 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. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of schemes. CR 33 requires detailed answers. Relevant to Letter's scheme allegation, probing defendants' complicity or conflicts.</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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; August 2020–2023 (scheme)</p>

<p><b>Interrogatory No. 10:</b> 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. <b>Legal Foundation:</b> 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.</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), 50: SMC 14.04 Discrimination/Retaliation, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (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</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020–2025 (club events)</p>
<p><b>Interrogatory No. 11:</b> State the date of formation of the Swedish Club's governance and bylaws committee. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of governance actions. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; March 9, 2023 (membership termination)</p>
<p><b>Interrogatory No. 12:</b> Describe the purpose and objectives of the governance and bylaws committee, including its role in membership policies. <b>Legal Foundation:</b> CR 26(b)(1) allows discovery of committee activities. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>

<p><b>Interrogatory No. 13:</b> Identify all members of the governance and bylaws committee and their service dates, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of committee composition. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>Interrogatory No. 14:</b> List all governance and bylaws committee meetings, including dates, topics discussed, and actions taken, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of meeting details. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee meetings (ongoing)</p>
<p><b>Interrogatory No. 15:</b> Identify all communications between the governance and bylaws committee and Langdon Miller, including dates and content, from July 1, 2024, to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of committee communications. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; July 2024–2025 (communications)</p>

<p><b>Interrogatory No. 16:</b> Identify all communications between the governance and bylaws committee and other Swedish Club board members, including dates and content, from July 1, 2024, to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of board communications. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kris Johansson, Gary Sund, Sharon Lucas; July 2024–2025 (communications)</p>
<p><b>Interrogatory No. 17:</b> Identify all communications between the governance and bylaws committee and the Swedish Club executive director, including dates and content, from July 1, 2024, to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of executive communications. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell; July 2024–2025 (communications)</p>
<p><b>Interrogatory No. 18:</b> Describe all proposed bylaw amendments by the governance and bylaws committee, including content and dates proposed, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) allows discovery of bylaw changes. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p><b>Interrogatory No. 19:</b> Describe all proposed member conduct standards by the governance and bylaws committee, including content and dates proposed, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of conduct policies. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>Interrogatory No. 20:</b> Identify all experts or legal advisors consulted by the governance and bylaws committee, including their contact information and dates of consultation, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of non-privileged advisor details. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>Interrogatory No. 21:</b> Describe all committee discussions regarding membership terminations, including Elizabeth Campbell's, with specific reference to dates, reasons, and outcomes, from March 9, 2023, to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of termination discussions. CR 33 mandates detailed answers. Relevant to membership interference.</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, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; March 9, 2023 termination</p>

<p><b>Interrogatory No. 22:</b> Explain the reasons for the formation of the governance and bylaws committee, including any specific events or issues prompting its creation. <b>Legal Foundation:</b> CR 26(b)(1) allows discovery of committee origins. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>
<p><b>Interrogatory No. 23:</b> Describe any retroactive bylaw changes proposed or implemented to justify past actions by the Swedish Club, including dates and content, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of retroactive policies. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>Interrogatory No. 24:</b> Describe any member input or feedback solicited or received by the governance and bylaws committee on bylaw or conduct changes, including dates and content, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of member feedback. CR 33 requires specificity. Relevant to membership interference.</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), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club members; Committee activities (ongoing)</p>



<p><b>Interrogatory No. 25:</b> Describe all proposed termination procedures for Swedish Club members developed by the governance and bylaws committee, including content and dates, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of termination policies. CR 33 mandates detailed answers. Relevant to membership interference.</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), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>Interrogatory No. 26:</b> Describe any legal opinions or advice received by the governance and bylaws committee regarding compliance with RCW 24.03A, including dates and content, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of non-privileged legal opinions. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>Interrogatory No. 27:</b> Identify the “former leader” referenced in the February 2025 Board President’s Letter, including their contact information and role at the Swedish Club. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of defamatory allegations. CR 33 requires specificity. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>

<p><b>Interrogatory No. 28:</b> List all Swedish Club board members from January 1, 2022, to present, including their names, contact information, and reasons for departure, if applicable. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of board composition. CR 33 requires specificity. Relevant to membership interference and discrimination.</p>	<p>16: Tortious Interference with Contract-Membership, 39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.53–5.100 (board ethics), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 353–364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; January 2022–2025 (board changes)</p>
<p><b>Interrogatory No. 29:</b> Identify all former Swedish Club members or employees who filed lawsuits or complaints against the Swedish Club, including case details, from January 1, 2022, to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of related disputes. CR 33 mandates detailed answers. Relevant to workplace harassment and discrimination.</p>	<p>45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 39–41, 43–44, 47, 50, 52–54: Discrimination, Retaliation, Public Accommodation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2022–2025 (lawsuits)</p>
<p><b>Interrogatory No. 30:</b> Confirm whether the “former leader” in the February 2025 Board President’s Letter is a defendant in this case, and if so, identify them. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of defamatory identities. CR 33 requires specificity. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>

<p><b>Interrogatory No. 31:</b> Describe Langdon Miller's role in the defense of this lawsuit, including any communications or actions taken, from January 1, 2023, to present. <b>Legal Foundation:</b> CR 26(b)(1) permits discovery of defense involvement. CR 33 mandates detailed answers. Relevant to multiple COAs involving Miller's board actions.</p>	<p>39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2023–2025 (lawsuit defense)</p>
<p><b>Interrogatory No. 32:</b> Explain how this lawsuit influenced the formation or activities of the governance and bylaws committee, including specific events or decisions, from January 1, 2023, to present. <b>Legal Foundation:</b> CR 26(b)(1) supports discovery of committee motives. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; January 2023–2025 (committee formation)</p>
<p><b>RFP No. 1:</b> Produce all documents related to the creation, drafting, or sending of the Letter, from December 1, 2024, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Elizabeth Campbell; December 2024 (Letter creation)</p>

<p><b>RFP No. 2:</b> Produce all communications by Kristine Leander mentioning Elizabeth Campbell, from August 15, 2020, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p><b>RFP No. 3:</b> Produce all documents reflecting gossip or negative statements about Elizabeth Campbell by Kristine Leander or others, from August 15, 2020, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2025 (gossip records)</p>
<p><b>RFP No. 4:</b> Produce all records related to the December 17, 2021, argument between Elizabeth Campbell and Lars Matthiesen, from December 17, 2021, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>

<p><b>RFP No. 5:</b> Produce all records related to Elizabeth Campbell's employment termination from the Swedish Club, from March 1, 2021, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; March 2021–2025 (termination records)</p>
<p><b>RFP No. 6:</b> Produce all records related to Elizabeth Campbell's membership exclusion from the Swedish Club, from August 15, 2020, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Sharon Lucas; August 2020–2025 (exclusion records)</p>
<p><b>RFP No. 7:</b> 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. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; December 2021–2025 (scheme records)</p>

<p><b>RFP No. 8:</b> Produce all communications between defendants discussing Elizabeth Campbell or the claims in this lawsuit, from October 1, 2020, to present. <b>Legal Foundation:</b> 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>Langdon Miller, Kristine Leander, Sharon Lucas, Kris Johansson; October 2020–2025 (communications)</p>
<p><b>RFP No. 9:</b> Produce all documents related to the formation of the Swedish Club's governance and bylaws committee, including meeting minutes and communications, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of committee records. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>
<p><b>RFP No. 10:</b> Produce all meeting minutes and agendas of the governance and bylaws committee, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of meeting records. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee meetings (ongoing)</p>

<p><b>RFP No. 11:</b> Produce all communications between governance and bylaws committee members, from July 1, 2024, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of committee communications. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; July 2024–2025 (communications)</p>
<p><b>RFP No. 12:</b> Produce all communications between the governance and bylaws committee and the Swedish Club board, from July 1, 2024, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of board communications. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kris Johansson, Gary Sund; July 2024–2025 (communications)</p>
<p><b>RFP No. 13:</b> Produce all communications between the governance and bylaws committee and the Swedish Club executive director, from July 1, 2024, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of executive communications. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell; July 2024–2025 (communications)</p>

<p><b>RFP No. 14:</b> Produce all documents reflecting proposed bylaw amendments by the governance and bylaws committee, from formation to present.</p> <p><b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of bylaw documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>RFP No. 15:</b> Produce all documents reflecting proposed member conduct standards by the governance and bylaws committee, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of conduct policies. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>RFP No. 16:</b> Produce all communications between the governance and bylaws committee and any experts or legal advisors, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of non-privileged advisor documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>



<p><b>RFP No. 17:</b> Produce all records of governance and bylaws committee discussions regarding membership terminations, including Elizabeth Campbell's, from March 9, 2023, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of termination records. Relevant to membership interference.</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, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; March 9, 2023 termination</p>
<p><b>RFP No. 18:</b> Produce all documents explaining the reasons for the formation of the governance and bylaws committee, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of committee origin documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>
<p><b>RFP No. 19:</b> Produce all documents reflecting retroactive bylaw changes proposed or implemented by the governance and bylaws committee, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of retroactive policy documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p><b>RFP No. 20:</b> Produce all documents reflecting member feedback on bylaw or conduct changes solicited or received by the governance and bylaws committee, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of feedback documents. Relevant to membership interference.</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), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club members; Committee activities (ongoing)</p>
<p><b>RFP No. 21:</b> Produce all documents reflecting proposed termination procedures for Swedish Club members developed by the governance and bylaws committee, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of termination policy documents. Relevant to membership interference.</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), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p><b>RFP No. 22:</b> Produce all legal opinions or advice received by the governance and bylaws committee regarding compliance with RCW 24.03A, from formation to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of non-privileged legal documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p><b>RFP No. 23:</b> Produce the February 2025 Board President's Letter and all related documents, including drafts and communications, from January 1, 2025, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>
<p><b>RFP No. 24:</b> Produce all records of Swedish Club board members, including names, contact information, and departure reasons, from January 1, 2022, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of board records. Relevant to membership interference and discrimination.</p>	<p>16: Tortious Interference with Contract-Membership, 39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.53–5.100 (board ethics), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 353–364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; January 2022–2025 (board changes)</p>
<p><b>RFP No. 25:</b> Produce all records of lawsuits or complaints filed by former Swedish Club members or employees against the Swedish Club, from January 1, 2022, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of dispute records. Relevant to workplace harassment and discrimination.</p>	<p>45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 39–41, 43–44, 47, 50, 52–54: Discrimination, Retaliation, Public Accommodation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2022–2025 (lawsuits)</p>

<p><b>RFP No. 26:</b> Produce all documents identifying the “former leader” in the February 2025 Board President’s Letter, including communications and drafts, from January 1, 2025, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>
<p><b>RFP No. 27:</b> Produce all records of Langdon Miller’s role in the defense of this lawsuit, including communications and actions taken, from January 1, 2023, to present. <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 support production of defense records. Relevant to multiple COAs involving Miller’s board actions.</p>	<p>39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2023–2025 (lawsuit defense)</p>