

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Identify the author of the Letter and how knowledge was obtained, July 1, 2024–present. Legal Foundation: CR 26(b)(1) permits 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), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander’s gossip (¶¶ 5.659–5.670)</p>	<p>Sharon Lucas, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)</p>
<p>Interrogatory No. 2: Describe your role in authoring or sending the Letter, including dates and reasons, December 1, 2024–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>Sharon Lucas, Elizabeth Campbell; December 2024 (Letter drafting)</p>
<p>Interrogatory No. 3: Describe Leander’s or others’ actions or plans to terminate Campbell’s Swedish Club membership, August 15, 2020–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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>Interrogatory No. 4: Identify instances of gossip about Campbell by Leander or others, including dates, locations, and content, August 15, 2020–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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2023 (club discussions)</p>
<p>Interrogatory No. 5: State knowledge of the December 17, 2021, Campbell-Matthiesen argument, including Leander’s role, January 1, 2021–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>Sharon Lucas, Elizabeth Campbell, Lars Matthiesen, Kristine Leander; December 17, 2021 argument</p>

<p>Interrogatory No. 6: Describe actions by Leander, you, or others contributing to Campbell's employment termination, August 1, 2020–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.</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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; January 18, 2022 staff meeting</p>
<p>Interrogatory No. 7: Identify decisions or actions leading to Campbell's membership exclusion, September 1, 2020–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.</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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>Interrogatory No. 8: Identify other Swedish Club membership terminations, including reasons and dates, June 1, 2019–present. Legal Foundation: 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>Sharon Lucas, Kristine Leander, Swedish Club; June 2019–2025 (membership terminations)</p>
<p>Interrogatory No. 9: Describe any coordinated efforts to terminate Campbell's employment or membership, August 15, 2020–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.</p>	<p>5: Interference with Business Expectancy, 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 324, 327–329, 333–334, 357–361, 366</p>	<p>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Gary Sund; August 2020–2023 (scheme)</p>
<p>Interrogatory No. 10: Identify witnesses to events in the Letter, including contact information, August 15, 2020–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.</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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020–2025 (club events)</p>

D Group 2 - Sharon Lucas
Discovery Summary

<p>Interrogatory No. 11: Describe your roles and interactions at the Swedish Club, including compensation, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of defendant's role and interactions. CR 33 requires specificity. Relevant to Lucas's authority and involvement in alleged misconduct.</p>	<p>3: Assault, 4: Battery, 5: Interference with Business Expectancy, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.174–5.177 (employment), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 323–324, 333–334</p>	<p>Sharon Lucas, Kristine Leander, Sarah Alaimo, Elizabeth Norgren, Swedish Club board; August 2020–2025 (club roles)</p>
<p>Interrogatory No. 12: Describe your relationship with the Swedish Club board, including training provided, January 1, 2021–present. Legal Foundation: CR 26(b)(1) supports discovery of board relationships and activities. CR 33 requires specificity. Relevant to Lucas's influence and potential interference.</p>	<p>5: Interference with Business Expectancy, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.53–5.100 (board ethics), pages 324, 333</p>	<p>Sharon Lucas, Swedish Club board; January 2021–2025 (board training)</p>
<p>Interrogatory No. 13: Describe all interactions with Campbell, including physical or verbal exchanges, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of interactions. CR 33 mandates detailed answers. Relevant to assault, battery, and misrepresentation claims.</p>	<p>3: Assault, 4: Battery, 7: Misrepresentation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.174–5.177 (employment), pages 323–325, 333–334</p>	<p>Sharon Lucas, Elizabeth Campbell; August 2020–2025 (interactions)</p>
<p>Interrogatory No. 14: Detail your actions and statements during the March 1, 2023, board meeting incident with Campbell. Legal Foundation: CR 26(b)(1) supports discovery of specific incident details. CR 33 requires specificity. Relevant to assault and battery claims.</p>	<p>3: Assault, 4: Battery, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression, including March 1, 2023 incident), pages 323–324, 333</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; March 1, 2023 board meeting</p>
<p>Interrogatory No. 15: Identify individuals you discussed the March 1, 2023, incident with and any resulting consequences. Legal Foundation: CR 26(b)(1) supports discovery of statements and consequences. CR 33 requires specificity. Relevant to assault, battery, and defamation claims.</p>	<p>3: Assault, 4: Battery, 15: Defamation</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (defamation), pages 323–324, 332–333</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; March 1, 2023 incident</p>
<p>Interrogatory No. 16: Describe actions or statements supporting Leander's aggression against Campbell's membership, August 2021. Legal Foundation: CR 26(b)(1) supports discovery of membership-related actions. CR 33 requires specificity. Relevant to membership interference and hostile environment claims.</p>	<p>16: Tortious Interference with Contract-Membership, 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), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), pages 333, 357–361, 366</p>	<p>Sharon Lucas, Kristine Leander, Elizabeth Campbell; August 2021 (membership aggression)</p>
<p>Interrogatory No. 17: Identify actions contributing to a hostile environment for Campbell, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of hostile actions. CR 33 mandates detailed answers. Relevant to hostile environment and retaliation claims.</p>	<p>45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), pages 357–361</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; August 2020–2025 (hostile environment)</p>

D Group 2 - Sharon Lucas
Discovery Summary

<p>Interrogatory No. 18: Describe involvement in Swedish Club election processes and bylaw changes, January 1, 2021–present. Legal Foundation: CR 26(b)(1) supports discovery of election and bylaw actions. CR 33 requires specificity. Relevant to interference and misrepresentation claims.</p>	<p>7: Misrepresentation, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions); Exhibit P-7 (page 467), pages 325, 333</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; January 2021–2025 (election processes)</p>
<p>Interrogatory No. 19: Describe incidents of alleged assault or aggression at other locations, January 1, 2015–present. Legal Foundation: CR 26(b)(1) supports discovery of behavioral history. CR 33 requires specificity. Relevant to assault and battery claims, establishing pattern of conduct.</p>	<p>3: Assault, 4: Battery</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), pages 323–324</p>	<p>Sharon Lucas, Elizabeth Campbell; January 2015–2025 (behavioral incidents)</p>
<p>Interrogatory No. 20: Identify disciplinary actions for assault, verbal abuse, or defamation, January 1, 2015–present. Legal Foundation: CR 26(b)(1) supports discovery of disciplinary records. CR 33 requires specificity. Relevant to assault, battery, and defamation claims.</p>	<p>3: Assault, 4: Battery, 15: Defamation</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (defamation), pages 323–324, 332</p>	<p>Sharon Lucas, Elizabeth Campbell; January 2015–2025 (disciplinary history)</p>
<p>Interrogatory No. 21: State participation in psychiatric or behavioral treatment, January 1, 2015–present. Legal Foundation: CR 26(b)(1) supports discovery of non-privileged behavioral treatment. CR 33 requires specificity. Relevant to assault and battery claims, assessing intent or control.</p>	<p>3: Assault, 4: Battery</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), pages 323–324</p>	<p>Sharon Lucas; January 2015–2025 (behavioral treatment)</p>
<p>Interrogatory No. 22: Describe communications about Leander’s management or retirement, January 1, 2021–December 31, 2023. Legal Foundation: CR 26(b)(1) supports discovery of communications about key figures. CR 33 requires specificity. Relevant to Leander’s role in alleged scheme and defamation.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–334</p>	<p>Sharon Lucas, Kristine Leander, Swedish Club board; January 2021–December 2023 (Leander communications)</p>
<p>Interrogatory No. 23: Describe communications about Alaimo’s hiring or termination, October 1, 2022–November 30, 2024. Legal Foundation: CR 26(b)(1) supports discovery of communications about staff. CR 33 requires specificity. Relevant to hostile environment and employment interference.</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), pages 334, 357–361</p>	<p>Sharon Lucas, Sarah Alaimo, Swedish Club board; October 2022–November 2024 (Alaimo communications)</p>
<p>Interrogatory No. 24: Describe communications about Norgren’s management or termination, February 1, 2023–November 30, 2024. Legal Foundation: CR 26(b)(1) supports discovery of communications about staff. CR 33 requires specificity. Relevant to hostile environment and employment interference.</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), pages 334, 357–361</p>	<p>Sharon Lucas, Elizabeth Norgren, Swedish Club board; February 2023–November 2024 (Norgren communications)</p>

D Group 2 - Sharon Lucas
Discovery Summary

Interrogatory No. 25: Describe communications about Campbell's performance or termination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of communications about plaintiff. CR 33 requires specificity. Relevant to defamation, interference, and hostile environment claims.	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	SAC ¶¶ 5.18–5.52 (membership), ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.659–5.776 (defamation, including 5.775), pages 332–334, 357–361	Sharon Lucas, Elizabeth Campbell, Swedish Club board; August 2020–2025 (Campbell communications)
Interrogatory No. 26: Describe communications about this lawsuit, January 1, 2023–present. Legal Foundation: CR 26(b)(1) supports discovery of lawsuit-related communications. CR 33 requires specificity. Relevant to coordinated defense and interference claims.	3: Assault, 4: Battery, 5: Interference with Business Expectancy, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy	SAC ¶¶ 5.101–5.145 (board actions), pages 323–324, 333–334	Sharon Lucas, Swedish Club board; January 2023–2025 (lawsuit communications)
Interrogatory No. 27: Identify harassment or retaliation complaints against Campbell or others, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of harassment complaints. CR 33 requires specificity. Relevant to hostile environment and retaliation claims.	45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation	SAC ¶¶ 5.481–5.512 (hostile workplace), pages 357–361	Sharon Lucas, Elizabeth Campbell, Swedish Club members; August 2020–2025 (harassment complaints)
Interrogatory No. 28: Identify complaints or communications made for/against Campbell, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of communications about plaintiff. CR 33 requires specificity. Relevant to defamation and hostile environment claims.	15: Defamation, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation	SAC ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.659–5.776 (defamation, including 5.775), pages 332, 357–361	Sharon Lucas, Elizabeth Campbell, Swedish Club members; August 2020–2025 (Campbell complaints)
Interrogatory No. 29: Describe your conduct at board meetings on June 3, 2022, November 2, 2022, and March 1, 2023. Legal Foundation: CR 26(b)(1) supports discovery of board meeting conduct. CR 33 requires specificity. Relevant to assault, battery, and interference claims.	3: Assault, 4: Battery, 16: Tortious Interference with Contract-Membership	SAC ¶¶ 5.101–5.145 (board aggression, including March 1, 2023), pages 323–324, 333	Sharon Lucas, Elizabeth Campbell, Swedish Club board; June 3, 2022, November 2, 2022, March 1, 2023 meetings
Interrogatory No. 30: Identify actions affecting Campbell's emotional well-being and justify them, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of actions causing distress. CR 33 requires specificity. Relevant to outrage and battery claims.	3: Assault, 4: Battery, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)	SAC ¶¶ 5.101–5.145 (board aggression), pages 323–324, 333	Sharon Lucas, Elizabeth Campbell; August 2020–2025 (emotional distress actions)
Interrogatory No. 31: Describe any joint defense agreements with other defendants, January 1, 2023–present. Legal Foundation: CR 26(b)(1) supports discovery of defense agreements. CR 33 requires specificity. Relevant to coordinated defense efforts.	3: Assault, 4: Battery, 5: Interference with Business Expectancy, 6: Conversion, 7: Misrepresentation, 39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation	SAC ¶¶ 5.101–5.145 (board actions), pages 323–325, 353–364	Sharon Lucas, Kristine Leander, Gary Sund, Kris Johansson; January 2023–2025 (joint defense)

<p>RFP No. 1: Produce documents related to the Letter's creation or sending, December 1, 2024–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of 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>Sharon Lucas, Elizabeth Campbell; December 2024 (Letter creation)</p>
<p>RFP No. 2: Produce Leander's documents mentioning Campbell, August 15, 2020–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 -</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>Sharon Lucas, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>RFP No. 3: Produce documents reflecting gossip about Campbell, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2025 (gossip records)</p>
<p>RFP No. 4: Produce records of the December 17, 2021, Campbell-Matthiesen argument, December 17, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 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>Sharon Lucas, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>
<p>RFP No. 5: Produce Campbell's employment termination records, March 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; March 2021–2025 (termination records)</p>
<p>RFP No. 6: Produce Campbell's membership exclusion records, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 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>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Gary Sund; August 2020–2025 (exclusion records)</p>

<p>RFP No. 7: Produce documents evidencing a scheme to terminate Campbell's employment or membership, December 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of scheme documents. Relevant to Letter's scheme allegation, probing defendants' complicity.</p>	<p>5: Interference with Business Expectancy, 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 324, 327–329, 333–334, 357–361, 366</p>	<p>Sharon Lucas, Kristine Leander, Elizabeth Campbell, Toene Hayes, Gary Sund; December 2021–2025 (scheme records)</p>
<p>RFP No. 8: Produce communications between defendants about Campbell or this lawsuit, October 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of coordinated communications. Relevant to multiple COAs, probing conflicts.</p>	<p>3: Assault, 4: Battery, 5: Interference with Business Expectancy, 6: Conversion, 7: Misrepresentation, 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 323–325, 327–329, 332–364, 366</p>	<p>Sharon Lucas, Kristine Leander, Gary Sund, Kris Johansson; October 2020–2025 (communications)</p>
<p>RFP No. 9: Produce communications with Campbell, emphasizing March 1, 2023, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications with plaintiff. Relevant to assault, battery, and misrepresentation claims.</p>	<p>3: Assault, 4: Battery, 7: Misrepresentation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression, including March 1, 2023), pages 323–325, 333</p>	<p>Sharon Lucas, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>RFP No. 10: Produce communications with other defendants or club members about Campbell or lawsuit, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications with defendants/staff. Relevant to interference, defamation, and hostile environment claims.</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</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.659–5.776 (Leander, including 5.775), pages 332–334, 357–361</p>	<p>Sharon Lucas, Kristine Leander, Elizabeth Norgren, Toene Hayes, Sarah Alaimo; August 2020–2025 (communications)</p>
<p>RFP No. 11: Produce records of the March 1, 2023, board meeting, including agendas and communications. Legal Foundation: CR 26(b)(1) and CR 34 permit production of incident records. Relevant to assault and battery claims.</p>	<p>3: Assault, 4: Battery, 15: Defamation</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression, including March 1, 2023), ¶¶ 5.659–5.776 (defamation), pages 323–324, 333</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; March 1, 2023 board meeting</p>

<p>RFP No. 12: Produce records of board meetings on June 3, 2022, November 2, 2022, and March 1, 2023. Legal Foundation: CR 26(b)(1) and CR 34 permit production of board meeting records. Relevant to assault, battery, and interference claims.</p>	<p>3: Assault, 4: Battery, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression, including March 1, 2023), pages 323–324, 333</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; June 3, 2022, November 2, 2022, March 1, 2023 meetings</p>
<p>RFP No. 13: Produce election and bylaw documents, including Campbell's candidacy, January 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of election records. Relevant to misrepresentation and interference claims.</p>	<p>7: Misrepresentation, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions); Exhibit P-7 (page 467), pages 325, 333</p>	<p>Sharon Lucas, Elizabeth Campbell, Charles Willi, Swedish Club board; January 2021–2025 (elections)</p>
<p>RFP No. 14: Produce records of compensation from the Swedish Club, January 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of compensation records. Relevant to interference claims, assessing Lucas's influence.</p>	<p>5: Interference with Business Expectancy, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), pages 324, 333</p>	<p>Sharon Lucas, Swedish Club board; January 2021–2025 (compensation)</p>
<p>RFP No. 15: Produce records of complaints or disciplinary actions for assault or defamation, January 1, 2010–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of disciplinary records. Relevant to assault, battery, and defamation claims.</p>	<p>3: Assault, 4: Battery, 15: Defamation</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (defamation), pages 323–324, 332</p>	<p>Sharon Lucas, Elizabeth Campbell; January 2010–2025 (behavioral incidents)</p>
<p>RFP No. 16: Produce non-privileged records of behavioral treatment, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of non-privileged treatment records. Relevant to assault and battery claims.</p>	<p>3: Assault, 4: Battery</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), pages 323–324</p>	<p>Sharon Lucas; January 2020–2025 (behavioral treatment)</p>
<p>RFP No. 17: Produce Swedish Club policies on membership and harassment, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of policy documents. Relevant to interference and hostile environment claims.</p>	<p>16: Tortious Interference with Contract-Membership, 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), ¶¶ 5.481–5.512 (hostile workplace), pages 333, 357–361, 366</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club; August 2020–2025 (policies)</p>
<p>RFP No. 18: Produce records of harassment or retaliation investigations, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of complaint records. Relevant to hostile environment and retaliation claims.</p>	<p>45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.481–5.512 (hostile workplace), pages 357–361</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club members; August 2020–2025 (complaints)</p>

D Group 2 - Sharon Lucas
Discovery Summary

<p>RFP No. 19: Produce personal notes or diaries referencing Campbell or club events, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of personal records. Relevant to assault, battery, and interference claims.</p>	<p>3: Assault, 4: Battery, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression, including March 1, 2023), pages 323–324, 333</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club board; August 2020–2025 (personal notes)</p>
<p>RFP No. 20: Produce Campbell’s membership status and restriction records, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of membership records. Relevant to membership interference claims.</p>	<p>16: Tortious Interference with Contract-Membership, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 366</p>	<p>Sharon Lucas, Elizabeth Campbell, Swedish Club; August 2020–2025 (membership records)</p>
<p>RFP No. 21: Produce social media or public statements about Campbell or lawsuit, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of public statements. Relevant to defamation and outrage claims.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (defamation, including 5.775), ¶¶ 5.101–5.145 (board aggression), pages 332–333</p>	<p>Sharon Lucas, Elizabeth Campbell; August 2020–2025 (social media statements)</p>
<p>RFP No. 22: Produce joint defense agreement records, January 1, 2023–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense agreements. Relevant to coordinated defense efforts.</p>	<p>3: Assault, 4: Battery, 5: Interference with Business Expectancy, 6: Conversion, 7: Misrepresentation, 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), pages 323–325, 353–364</p>	<p>Sharon Lucas, Kristine Leander, Gary Sund, Kris Johansson; January 2023–2025 (joint defense)</p>
<p>RFP No. 23: Produce board training materials, January 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of training materials. Relevant to interference claims, assessing Lucas’s influence.</p>	<p>5: Interference with Business Expectancy, 16: Tortious Interference with Contract-Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), pages 324, 333</p>	<p>Sharon Lucas, Swedish Club board; January 2021–2025 (training materials)</p>