

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Identify the author of the Letter and how knowledge was obtained, July 1, 2024–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a detailed privilege log is required under CR 26(b)(5). The request is narrowly tailored to uncover the club’s knowledge of Leander’s actions, and CR 33(a) requires complete answers.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation/harassment, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander’s gossip (¶¶ 5.659–5.670)</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)</p>
<p>Interrogatory No. 2: Describe the club’s role in authoring or sending the Letter, December 1, 2024–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to probe the club’s complicity in Leander’s actions, and CR 33(a) requires 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>Swedish Club, Elizabeth Campbell; December 2024 (Letter drafting)</p>
<p>Interrogatory No. 3: Describe Leander’s or club’s actions to terminate Campbell’s membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to uncover club policies and actions, and CR 33(a) requires specific answers. Any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Swedish Club, 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 club members, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COAs 45–46 (Hostile Work Environment) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club’s knowledge of Leander’s actions, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), pages 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2023 (club discussions)</p>

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<p>Interrogatory No. 5: State knowledge of the December 17, 2021, Campbell-Matthiesen argument, January 1, 2021–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.891–5.898. The request is narrowly tailored to the incident, and CR 33(a) requires complete answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander’s role, including 5.775), ¶¶ 5.101–5.145 (board aggression), pages 332–335</p>	<p>Swedish Club, Elizabeth Campbell, Lars Matthiesen, Kristine Leander; December 17, 2021 argument</p>
<p>Interrogatory No. 6: Describe actions by Leander or club contributing to Campbell’s employment termination, August 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 39–41 (Discrimination) and 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.174–5.177. The request is tailored to uncover the club’s role in termination, and CR 33(a) requires specific answers. Any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 39: Title VII Discrimination, 40: WLAD Discrimination, 41: SMC 14.04 Discrimination, 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, 353–361</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; January 18, 2022 staff meeting</p>
<p>Interrogatory No. 7: Identify club decisions or policies leading to Campbell’s membership exclusion, September 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 56 (Breach of Contract - Membership) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is relevant to the club’s exclusion practices, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 34: CPA Violation, 55: 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, 343, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>Interrogatory No. 8: Identify other membership terminations at the club, June 1, 2019–present. Legal Foundation: CR 26(b)(1) allows discovery relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to uncover discriminatory practices, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires specific answers.</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.178–5.194 (public accommodation), pages 343, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell; June 2019–2025 (membership terminations)</p>

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<p>Interrogatory No. 9: Describe coordinated efforts by the club or defendants to terminate Campbell's employment or membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. The request is narrowly tailored to uncover schemes, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 34: CPA Violation, 39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment, 55: Public Accommodation, 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, 343, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Gary Sund; August 2020–2023 (scheme)</p>
<p>Interrogatory No. 10: Identify witnesses to events in the Letter, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 15 (Defamation) and COAs 39–41 (Discrimination) as alleged in SAC ¶¶ 5.659–5.776. The request is tailored to uncover evidence of the club's knowledge, and CR 33(a) requires complete answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 39–41: Discrimination, 45–47: Hostile Work Environment, 55: 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), pages 327–329, 332–335, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020–2025 (club events)</p>
<p>Interrogatory No. 11: Describe club policies on membership termination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to club policies, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires specific answers.</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 343, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (membership policies)</p>
<p>Interrogatory No. 12: Identify board meetings discussing Campbell's membership or employment, September 1, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery relevant to COAs 39–41 (Discrimination) and COA 56 (Breach of Contract - Membership) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to board actions, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.174–5.177 (employment), pages 333, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>

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<p>Interrogatory No. 13: Describe club's investigation of Campbell's harassment or discrimination complaints, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 45–47 (Hostile Work Environment) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.481–5.512. The request is relevant to the club's response to complaints, and CR 33(a) requires complete answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 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), ¶¶ 5.101–5.145 (board actions), pages 353–361</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (investigations)</p>
<p>Interrogatory No. 14: Identify club policies on public access to facilities, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.178–5.194. The request is narrowly tailored to access policies, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires specific answers.</p>	<p>34: CPA Violation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.178–5.194 (public accommodation), ¶¶ 5.18–5.52 (membership policies), pages 343, 364</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (public access policies)</p>
<p>Interrogatory No. 15: Describe club's actions to address Campbell's emotional distress claims, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 18–19 (Tort of Outrage) and 45–46 (Hostile Work Environment) as alleged in SAC ¶¶ 5.481–5.512. The request is relevant to the club's response to distress claims, and CR 33(a) requires detailed answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), pages 332–333, 357–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (distress responses)</p>
<p>Interrogatory No. 16: Identify club's communications with Leander about Campbell's termination, August 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.174–5.177. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover the club's role in termination, and CR 33(a) requires detailed answers.</p>	<p>17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 43–44: Retaliation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 334, 353–361</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell; August 2020–2025 (termination communications)</p>

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<p>Interrogatory No. 17: Describe club's hiring and termination of Sarah Alaimo, October 1, 2022–November 30, 2024. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 45–47 (Hostile Work Environment) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. The request is relevant to the club's employment practices, and CR 33(a) requires specific answers. Any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 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 353–361</p>	<p>Swedish Club, Sarah Alaimo, Elizabeth Campbell; October 2022–November 2024 (Alaimo employment)</p>
<p>Interrogatory No. 18: Describe club's hiring and termination of Elizabeth Norgren, February 1, 2023–November 30, 2024. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 45–47 (Hostile Work Environment) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. The request is tailored to employment practices, and CR 33(a) requires specific answers. Any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 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 353–361</p>	<p>Swedish Club, Elizabeth Norgren, Elizabeth Campbell; February 2023–November 2024 (Norgren employment)</p>
<p>Interrogatory No. 19: Identify club's communications about Campbell's performance or termination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 15 (Defamation) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club's actions, and CR 33(a) requires detailed answers.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 45–47: Hostile Work Environment</p>	<p>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, 353–361</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (Campbell communications)</p>
<p>Interrogatory No. 20: Describe club's bylaws governing membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 56 (Breach of Contract - Membership) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.13–5.17. The request is narrowly tailored to bylaws, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires specific answers.</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 343, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (bylaws)</p>

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<p>Interrogatory No. 21: Identify club's disciplinary actions against members for misconduct, June 1, 2019–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 39–41 (Discrimination) and 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to uncover discriminatory practices, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires complete answers.</p>	<p>34: CPA Violation, 39–41: Discrimination, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.178–5.194 (public accommodation), pages 343, 353–361, 364</p>	<p>Swedish Club, Elizabeth Campbell; June 2019–2025 (disciplinary actions)</p>
<p>Interrogatory No. 22: Describe club's response to Campbell's discrimination claims, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 43–44 (Retaliation) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. The request is relevant to the club's actions, and CR 33(a) requires specific answers. If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.101–5.145 (board actions), pages 353–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (discrimination responses)</p>
<p>Interrogatory No. 23: Identify club's communications with board members about Campbell's membership, September 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 56 (Breach of Contract - Membership) and COAs 39–41 (Discrimination) as alleged in SAC ¶¶ 5.18–5.52. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to board actions, and CR 33(a) requires detailed answers.</p>	<p>16: Tortious Interference with Contract-Membership, 39–41: Discrimination, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership), ¶¶ 5.101–5.145 (board aggression), pages 333, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Gary Sund; September 2020–2025 (board communications)</p>
<p>Interrogatory No. 24: Describe club's policies on board meeting access for members, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to access policies, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires specific answers.</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.178–5.194 (public accommodation), pages 343, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (board meeting access)</p>

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<p>Interrogatory No. 25: Identify club's communications about this lawsuit, January 1, 2023–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover coordinated defense efforts, and CR 33(a) requires complete answers.</p>	<p>39–41: Discrimination, 43–44: Retaliation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.481–5.512 (hostile workplace), pages 353–361, 364</p>	<p>Swedish Club, Kristine Leander, Gary Sund; January 2023–2025 (lawsuit communications)</p>
<p>Interrogatory No. 26: Describe club's actions to ensure compliance with public accommodation laws, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.178–5.194. The request is relevant to the club's compliance efforts, and CR 33(a) requires specific answers. Any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.178–5.194 (public accommodation), ¶¶ 5.18–5.52 (membership policies), pages 343, 364</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (public accommodation compliance)</p>
<p>Interrogatory No. 27: Identify club's records of Campbell's membership dues and status, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to membership records, and any claim of undue burden must be substantiated under CR 26(c). CR 33(a) requires complete answers.</p>	<p>55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (membership records)</p>
<p>Interrogatory No. 28: Describe club's policies on handling member complaints, August 15, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 39–41 (Discrimination) and 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is relevant to the club's complaint procedures, and CR 33(a) requires specific answers. Any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 39–41: Discrimination, 43–44: Retaliation</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.481–5.512 (hostile workplace), pages 343, 353–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (complaint policies)</p>

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<p>Interrogatory No. 29: Identify club's joint defense agreements with defendants, January 1, 2023–present. Legal Foundation: CR 26(b)(1) supports discovery relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to defense coordination, and CR 33(a) requires complete answers.</p>	<p>39–41: Discrimination, 43–44: Retaliation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.481–5.512 (hostile workplace), pages 353–361, 364</p>	<p>Swedish Club, Kristine Leander, Gary Sund, Kris Johansson; January 2023–2025 (joint defense)</p>
<p>RFP No. 1: Produce documents related to the Letter's creation or sending, December 1, 2024–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is narrowly tailored to uncover the club's involvement, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p>	<p>Swedish Club, 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 permit production of documents relevant to COAs 39–41 (Discrimination) and 16–17 (Interference) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club's knowledge of Leander's actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 45–47: Hostile Work Environment, 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), ¶¶ 5.481–5.512 (hostile workplace), pages 333–334, 353–361, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>RFP No. 3: Produce documents reflecting gossip about Campbell, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) and COAs 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover the club's complicity, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45–47: Hostile Work Environment</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), pages 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2025 (gossip records)</p>

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<p>RFP No. 4: Produce records of the December 17, 2021, Campbell-Matthiesen argument, December 17, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 15 (Defamation) as alleged in SAC ¶¶ 5.891–5.898. The request is narrowly tailored to the incident, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander’s role, including 5.775), ¶¶ 5.101–5.145 (board aggression), pages 332–335</p>	<p>Swedish Club, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>
<p>RFP No. 5: Produce Campbell’s employment termination records, March 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.174–5.177. The request is tailored to termination records, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment</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, 353–361</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; March 2021–2025 (termination records)</p>
<p>RFP No. 6: Produce Campbell’s membership exclusion records, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56 (Breach of Contract - Membership) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is relevant to the club’s exclusion practices, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>16: Tortious Interference with Contract-Membership, 34: CPA Violation, 55: 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, 343, 364, 366</p>	<p>Swedish Club, 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 permit production of documents relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to uncover schemes, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 34: CPA Violation, 39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment, 55: Public Accommodation, 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, 343, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Toene Hayes, Gary Sund; December 2021–2025 (scheme records)</p>

<p>RFP No. 8: Produce communications between defendants about Campbell or this lawsuit, October 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to coordinated actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment, 55: 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, 332–334, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Gary Sund, Kris Johansson; October 2020–2025 (communications)</p>
<p>RFP No. 9: Produce club policies on membership termination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of policies relevant to COA 56 (Breach of Contract - Membership) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to membership policies, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 343, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (membership policies)</p>
<p>RFP No. 10: Produce board meeting records discussing Campbell’s membership or employment, September 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and COA 56 (Breach of Contract - Membership) as alleged in SAC ¶¶ 5.18–5.52. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to board actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.174–5.177 (employment), pages 333, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>RFP No. 11: Produce records of investigations into Campbell’s harassment or discrimination complaints, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 45–47 (Hostile Work Environment) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.481–5.512. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club’s response to complaints, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 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), ¶¶ 5.101–5.145 (board actions), pages 353–361</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (investigations)</p>

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<p>RFP No. 12: Produce club policies on public access to facilities, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of policies relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.178–5.194. The request is narrowly tailored to access policies, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.178–5.194 (public accommodation), ¶¶ 5.18–5.52 (membership policies), pages 343, 364</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (public access policies)</p>
<p>RFP No. 13: Produce records of club’s response to Campbell’s emotional distress claims, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 18–19 (Tort of Outrage) and 45–46 (Hostile Work Environment) as alleged in SAC ¶¶ 5.481–5.512. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to distress responses, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD)</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), pages 332–333, 357–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (distress responses)</p>
<p>RFP No. 14: Produce communications with Leander about Campbell’s termination, August 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.174–5.177. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club’s termination actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 43–44: Retaliation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.659–5.776 (Leander’s actions, including 5.775), pages 334, 353–361</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell; August 2020–2025 (termination communications)</p>
<p>RFP No. 15: Produce records of Sarah Alaimo’s hiring and termination, October 1, 2022–November 30, 2024. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 45–47 (Hostile Work Environment) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. The request is tailored to employment practices, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>39–41: Discrimination, 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 353–361</p>	<p>Swedish Club, Sarah Alaimo, Elizabeth Campbell; October 2022–November 2024 (Alaimo employment)</p>

<p>RFP No. 16: Produce records of Elizabeth Norgren's hiring and termination, February 1, 2023–November 30, 2024. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 45–47 (Hostile Work Environment) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. The request is tailored to employment practices, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a privilege log is required under CR 26(b)(5).</p>	<p>39–41: Discrimination, 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 353–361</p>	<p>Swedish Club, Elizabeth Norgren, Elizabeth Campbell; February 2023–November 2024 (Norgren employment)</p>
<p>RFP No. 17: Produce communications about Campbell's performance or termination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COAs 15 (Defamation) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.659–5.776. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club's actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 39–41: Discrimination, 45–47: Hostile Work Environment</p>	<p>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, 353–361</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (Campbell communications)</p>
<p>RFP No. 18: Produce club bylaws governing membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of bylaws relevant to COA 56 (Breach of Contract - Membership) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.13–5.17. The request is narrowly tailored to bylaws, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 343, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (bylaws)</p>
<p>RFP No. 19: Produce records of disciplinary actions against members, June 1, 2019–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to uncover disciplinary practices, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 39–41: Discrimination, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.178–5.194 (public accommodation), pages 343, 353–361, 364</p>	<p>Swedish Club, Elizabeth Campbell; June 2019–2025 (disciplinary actions)</p>

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<p>RFP No. 20: Produce records of club's response to Campbell's discrimination claims, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 43–44 (Retaliation) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club's actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.101–5.145 (board actions), pages 353–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (discrimination responses)</p>
<p>RFP No. 21: Produce communications with board members about Campbell's membership, September 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COA 56 (Breach of Contract - Membership) and COAs 39–41 (Discrimination) as alleged in SAC ¶¶ 5.18–5.52. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to board actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>16: Tortious Interference with Contract-Membership, 39–41: Discrimination, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership), ¶¶ 5.101–5.145 (board aggression), pages 333, 353–361, 364, 366</p>	<p>Swedish Club, Kristine Leander, Gary Sund; September 2020–2025 (board communications)</p>
<p>RFP No. 22: Produce club policies on board meeting access, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of policies relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to access policies, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.178–5.194 (public accommodation), pages 343, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (board meeting access)</p>
<p>RFP No. 23: Produce communications about this lawsuit, January 1, 2023–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to coordinated defense efforts, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.481–5.512 (hostile workplace), pages 353–361, 364</p>	<p>Swedish Club, Kristine Leander, Gary Sund; January 2023–2025 (lawsuit communications)</p>

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<p>RFP No. 24: Produce records of club's compliance with public accommodation laws, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.178–5.194. The request is tailored to compliance efforts, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.178–5.194 (public accommodation), ¶¶ 5.18–5.52 (membership policies), pages 343, 364</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (public accommodation compliance)</p>
<p>RFP No. 25: Produce Campbell's membership dues and status records, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to membership records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (membership records)</p>
<p>RFP No. 26: Produce club policies on handling member complaints, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of policies relevant to COAs 39–41 (Discrimination) and 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is relevant to complaint procedures, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 39–41: Discrimination, 43–44: Retaliation</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.481–5.512 (hostile workplace), pages 343, 353–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (complaint policies)</p>
<p>RFP No. 27: Produce joint defense agreement records, January 1, 2023–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to defense coordination, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.481–5.512 (hostile workplace), pages 353–361, 364</p>	<p>Swedish Club, Kristine Leander, Gary Sund, Kris Johansson; January 2023–2025 (joint defense)</p>

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<p>RFP No. 28: Produce records of club's board training programs, January 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 34 (CPA Violation) as alleged in SAC ¶¶ 5.53–5.100. The request is tailored to governance practices, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 39–41: Discrimination</p>	<p>SAC ¶¶ 5.53–5.100 (board ethics), ¶¶ 5.101–5.145 (board actions), pages 343, 353–361</p>	<p>Swedish Club, Elizabeth Campbell; January 2021–2025 (board training)</p>
<p>RFP No. 29: Produce records of club's financial transactions related to Campbell's membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 56 (Breach of Contract - Membership) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to financial records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 343, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (financial transactions)</p>
<p>RFP No. 30: Produce club's employee training materials on discrimination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of training materials relevant to COAs 39–41 (Discrimination) and 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.481–5.512. The request is tailored to training practices, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 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 353–361</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (employee training)</p>
<p>RFP No. 31: Produce records of club's communications with legal counsel about Campbell's claims, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of non-privileged communications relevant to COAs 39–41 (Discrimination) and 43–44 (Retaliation) as alleged in SAC ¶¶ 5.101–5.145. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to the club's response to claims, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.481–5.512 (hostile workplace), pages 353–361, 364</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (legal communications)</p>

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<p>RFP No. 32: Produce club's records of member voting procedures, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to voting procedures, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), pages 333, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (voting procedures)</p>
<p>RFP No. 33: Produce club's records of board elections, January 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 34 (CPA Violation) as alleged in SAC ¶¶ 5.67–5.90. The request is tailored to governance fairness, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>34: CPA Violation, 39–41: Discrimination</p>	<p>SAC ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), pages 343, 353–361</p>	<p>Swedish Club, Elizabeth Campbell; January 2021–2025 (board elections)</p>
<p>RFP No. 34: Produce club's records of Campbell's participation in club events, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is tailored to event participation, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.178–5.194 (public accommodation), pages 353–361, 364</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (event participation)</p>
<p>RFP No. 35: Produce club's records of complaints against Leander, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.481–5.512. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to complaints against Leander, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 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), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), pages 353–361</p>	<p>Swedish Club, Kristine Leander, Elizabeth Campbell; August 2020–2025 (Leander complaints)</p>

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<p>RFP No. 36: Produce club's records of Campbell's membership application and approval, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to application records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (membership application)</p>
<p>RFP No. 37: Produce club's records of board communications about Campbell's complaints, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of communications relevant to COAs 43–44 (Retaliation) and 39–41 (Discrimination) as alleged in SAC ¶¶ 5.481–5.512. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is relevant to board actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 43–44: Retaliation, 45–47: Hostile Work Environment</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.481–5.512 (hostile workplace), pages 353–361</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (complaint communications)</p>
<p>RFP No. 38: Produce club's records of membership reinstatement procedures, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 56 (Breach of Contract - Membership) and COA 55 (Public Accommodation) as alleged in SAC ¶¶ 5.18–5.52. The request is narrowly tailored to reinstatement procedures, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>55: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Swedish Club, Elizabeth Campbell; August 2020–2025 (reinstatement procedures)</p>
<p>RFP No. 39: Produce club's records of Campbell's interactions with club staff, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COAs 39–41 (Discrimination) and 45–47 (Hostile Work Environment) as alleged in SAC ¶¶ 5.481–5.512. If privilege is asserted, a privilege log is required under CR 26(b)(5). The request is tailored to staff interactions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>39–41: Discrimination, 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 353–361</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (staff interactions)</p>

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<p>RFP No. 40: Produce club's records of public events and member exclusions, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of records relevant to COA 55 (Public Accommodation) and COA 34 (CPA Violation) as alleged in SAC ¶¶ 5.178–5.194. The request is tailored to event access and exclusion practices, and any claim of undue burden must be substantiated under CR 26(c). If privilege is asserted, a detailed privilege log is required under CR 26(b)(5).</p>	<p>34: CPA Violation, 39–41: Discrimination, 55: Public Accommodation</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.178–5.194 (public accommodation), pages 333, 343, 353–361, 364</p>	<p>Swedish Club, Elizabeth Campbell, Kristine Leander; August 2020–2025 (public events and exclusions)</p>
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