

| Interrogatory/RFP and Legal Foundation | Related Causes of Action | Related Complaint Paragraphs | Key Individuals and Activities/Events |
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| <p>Interrogatory No. 1: Identity of the Letter's Author: Do you have any knowledge of the identity of the person or entity who wrote or sent the Letter to Plaintiff? If yes, state the identity and describe how you obtained this knowledge; from July 1, 2024 to the present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery of information relevant to COA 50: 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 tailored to Letter authorship, and any claim of undue burden must be substantiated under CR 26(c).</p> | 50: Defamation | SAC ¶¶ 5.659–5.776 (Leander's alleged harassment and defamatory statements, including 5.775, pages 332–366); ¶¶ 5.926–5.938 (Odderson's board role, potentially aware of club communications, pages 447–450) | Campbell, Leander; Letter transmission (post-July 2024) |
| <p>Interrogatory No. 2: State if you or anyone on your behalf authored, sent, or contributed to drafting or mailing the Letter, including dates, methods, and reasons, from December 1, 2024 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 50: 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 tailored to Odderson's involvement in the Letter, and any claim of undue burden must be substantiated under CR 26(c).</p> | 50: Defamation | SAC ¶¶ 5.659–5.776 (Leander's alleged scheme and defamatory actions, including 5.775, pages 332–366); ¶¶ 5.926–5.938 (Odderson's board governance, potentially overseeing communications, pages 447–450) | Campbell, Leander, Odderson; Letter drafting/sending (post-December 2024) |
| <p>Interrogatory No. 3: Describe actions, statements, or plans by Leander, you, or others related to Plaintiff's membership termination and exclusion from the Swedish Club, including dates, reasons, and notices, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COAs 8–12: Discrimination as alleged in SAC ¶¶ 5.18–5.52, 5.659–5.776; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to membership termination details, and any claim of undue burden must be substantiated under CR 26(c).</p> | 56: Retaliation, 8–12: Discrimination | SAC ¶¶ 5.926–5.938 (Odderson's board role in club decisions, pages 447–450); ¶¶ 5.659–5.776 (Leander's retaliatory actions, including 5.775, pages 332–366); ¶¶ 5.18–5.52 (membership termination practices, pages 7–13) | Campbell, Leander, Odderson; Membership termination (post-August 2020) |
| <p>Interrogatory No. 4: Identify instances where Leander, you, or others discussed Plaintiff with club members or staff, including dates, locations, participants, and content, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 50: 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 tailored to defamatory statements, and any claim of undue burden must be substantiated under CR 26(c).</p> | 50: Defamation | SAC ¶¶ 5.926–5.938 (Odderson's board role, potentially aware of discussions, pages 447–450); ¶¶ 5.659–5.776 (Leander's alleged gossip and defamatory statements, including 5.775, pages 332–366) | Campbell, Leander, Odderson, club members; Gossip at Swedish Club (post-August 2020) |

Interrogatory No. 5: State knowledge of the public argument between Plaintiff and Matthiesen on December 17, 2021, including date, location, witnesses, and Leander's role, from January 1, 2021 to present; **Legal Foundation:** CR 26(b)(1) and CR 33 permit discovery relevant to COAs 43–44: Hostile Environment as alleged in SAC ¶¶ 5.891–5.898; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to the December 2021 incident, and any claim of undue burden must be substantiated under CR 26(c).

43–44: Hostile Environment

SAC ¶¶ 5.926–5.938 (Odderson's board role during hostile incidents, pages 447–450); ¶¶ 5.891–5.898 (Matthiesen's public argument with Campbell, pages 434–436); ¶¶ 5.659–5.776 (Leander's influence, pages 332–366)

Campbell, Matthiesen, Leander; December 17, 2021 public argument

Interrogatory No. 6: Describe actions by Leander, you, or others contributing to Plaintiff's employment termination, including persons, dates, reasons, and communications, from August 1, 2020 to present; **Legal Foundation:** CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45–47: Wrongful Termination and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.174–5.177, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to termination actions, and any claim of undue burden must be substantiated under CR 26(c).

45–47: Wrongful Termination, 27: Aiding and Abetting

SAC ¶¶ 5.926–5.938 (Odderson's board oversight of club decisions, pages 447–450); ¶¶ 5.174–5.177 (employment termination practices, pages 91–92); ¶¶ 5.659–5.776 (Leander's role, pages 332–366); ¶¶ 5.899–5.925 (Alaimo's employment oversight, pages 437–446)

Campbell, Leander, Odderson, Alaimo; Employment termination (post-August 2020)

Interrogatory No. 7: Identify decisions, policies, or actions by Leander, you, or others leading to Plaintiff's membership termination and exclusion, including dates, reasons, and notices, from September 1, 2020 to present; **Legal Foundation:** CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COAs 8–12: Discrimination as alleged in SAC ¶¶ 5.18–5.52, 5.659–5.776; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to exclusion policies, and any claim of undue burden must be substantiated under CR 26(c).

56: Retaliation, 8–12: Discrimination

SAC ¶¶ 5.926–5.938 (Odderson's board role in club governance, pages 447–450); ¶¶ 5.18–5.52 (membership exclusion policies, pages 7–13); ¶¶ 5.659–5.776 (Leander's retaliatory actions, including 5.775, pages 332–366)

Campbell, Leander, Odderson; Membership exclusion (post-September 2020)

Interrogatory No. 8: Identify decisions, policies, or actions by Leander, you, or others leading to any member's membership termination and exclusion, including dates, reasons, and notices, from June 1, 2019 to present; **Legal Foundation:** CR 26(b)(1) and CR 33 permit discovery relevant to COAs 8–12: 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 club membership practices, and any claim of undue burden must be substantiated under CR 26(c).

8–12: Discrimination

SAC ¶¶ 5.926–5.938 (Odderson's board governance of club policies, pages 447–450); ¶¶ 5.18–5.52 (membership termination practices, pages 7–13); ¶¶ 5.659–5.776 (Leander's discriminatory policies, pages 332–366)

Campbell, Leander, Odderson, other members; Member exclusions (post-June 2019)

D Group 3 - Ib Odderson
Discovery Summary

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| <p>Interrogatory No. 9: Describe plans, agreements, or efforts by you or others to terminate Plaintiff's employment or membership, including participants, timelines, and objectives, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.659–5.776, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to coordinated termination efforts, and any claim of undue burden must be substantiated under CR 26(c).</p> | <p>56: Retaliation, 27: Aiding and Abetting</p> | <p>SAC ¶¶ 5.926–5.938 (Odderson's board role, pages 447–450); ¶¶ 5.659–5.776 (Leander's scheme to terminate Campbell, including 5.775, pages 332–366); ¶¶ 5.319–5.479 (Campbell's advocacy, pages 194–242); ¶¶ 5.899–5.925 (Alaimo's role, pages 437–446)</p> | <p>Campbell, Leander, Odderson, Alaimo; Termination scheme (post-August 2020)</p> |
| <p>Interrogatory No. 10: Identify individuals with knowledge of events or statements in the Letter, including Leander's actions toward Plaintiff, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 50: Defamation and COA 56: Retaliation 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 witness identification, and any claim of undue burden must be substantiated under CR 26(c).</p> | <p>50: Defamation, 56: Retaliation</p> | <p>SAC ¶¶ 5.926–5.938 (Odderson's board knowledge, pages 447–450); ¶¶ 5.659–5.776 (Leander's defamatory statements and retaliatory actions, including 5.775, pages 332–366); Letter tied to gossip (¶¶ 5.659–5.670, pages 332–335)</p> | <p>Campbell, Leander, club members; Letter-related events (post-August 2020)</p> |
| <p>Interrogatory No. 11: State the date you resigned from the Swedish Club Board and explain all reasons for your resignation; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to Odderson's board role as alleged in SAC ¶¶ 5.926–5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation details, and any claim of undue burden must be substantiated under CR 26(c).</p> | <p>N/A</p> | <p>SAC ¶¶ 5.926–5.938 (Odderson's board role and resignation context, pages 447–450); ¶¶ 5.195–5.318 (club governance issues, pages 104–189)</p> | <p>Odderson; Resignation from board (date unspecified)</p> |
| <p>Interrogatory No. 12: State if you discussed Plaintiff's lawsuit, membership, employment termination, or mistreatment with board members during your tenure, including dates and participants; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to board actions as alleged in SAC ¶¶ 5.319–5.479; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to board discussions, and any claim of undue burden must be substantiated under CR 26(c).</p> | <p>N/A</p> | <p>SAC ¶¶ 5.926–5.938 (Odderson's board discussions, potentially involving Campbell's claims, pages 447–450); ¶¶ 5.319–5.479 (Campbell's lawsuit and mistreatment allegations, pages 194–242)</p> | <p>Campbell, Odderson, board members; Lawsuit discussions (during Odderson's tenure)</p> |

Interrogatory No. 13: Resignation: Describe the events, interactions, or any communications with Kristine Leander, Elizabeth Norgren, Langdon Miller, other board members, or Club members that preceded and influenced your resignation, including specific dates; **Legal Foundation:** CR 26(b)(1) and CR 33 permit discovery relevant to Odderson's resignation context as alleged in SAC ¶¶ 5.926–5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to pre-resignation interactions, and any claim of undue burden must be substantiated under CR 26(c).

N/A

SAC ¶¶ 5.926–5.938 (Odderson's board role and resignation context, pages 447–450); SAC ¶¶ 5.659–5.776 (Leander's influence, pages 332–366); SAC ¶¶ 5.865–5.890 (Norgren's role, pages 426–432)

Odderson; Leander; Norgren; Miller; board members; Pre-resignation interactions (pre-resignation)

Interrogatory No. 14: Resignation: Did you raise concerns or express dissatisfaction with the Swedish Club's operations management, personnel decisions, cultural programming, financial transparency, financial management or decisions, board governance to any individual prior to resigning? If so, identify the recipients and summarize the discussions; **Legal Foundation:** CR 26(b)(1) and CR 33 permit discovery relevant to governance issues as alleged in SAC ¶¶ 5.195–5.318; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to concerns raised before resignation, and any claim of undue burden must be substantiated under CR 26(c).

N/A

SAC ¶¶ 5.926–5.938 (Odderson's board role, pages 447–450); SAC ¶¶ 5.195–5.318 (club financial and operational issues, pages 104–189)

Odderson; board members; Governance concerns (pre-resignation)

RFP No. 1: Documents Related to the Letter: All documents, communications, or drafts related to the creation, sending, or receipt of the Letter, including envelopes, notes, or correspondence discussing its contents or purpose; from December 1, 2024 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COA 50: 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 tailored to Letter documents, and any claim of undue burden must be substantiated under CR 26(c).

50: Defamation

SAC ¶¶ 5.659–5.776 (Leander's alleged scheme and defamatory statements, including 5.775, pages 332–366); SAC ¶¶ 5.926–5.938 (Odderson's board role, potentially overseeing correspondence, pages 447–450)

Campbell; Leander; Letter creation (post-December 2024)

RFP No. 2: Communications by Kristine Leander: All documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander that mention Plaintiff, Plaintiff's employment, or Plaintiff's membership at the Swedish Club, from August 15, 2020 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56: Retaliation and COA 50: 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 tailored to Leander's communications, and any claim of undue burden must be substantiated under CR 26(c).

56: Retaliation; 50: Defamation

SAC ¶¶ 5.926–5.938 (Odderson's board role, potentially aware of communications, pages 447–450); SAC ¶¶ 5.659–5.776 (Leander's communications targeting Campbell, including 5.775, pages 332–366)

Campbell; Leander; Leander's communications (post-August 2020)

RFP No. 3: Gossip Evidence: All documents reflecting statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club employees or members, or third parties, as referenced in the Letter, including dates and recipients, from August 15, 2020 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COA 50: 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 tailored to gossip documents, and any claim of undue burden must be substantiated under CR 26(c).

50: Defamation

SAC ¶¶ 5.926–5.938 (Odderson's board role, potentially aware of discussions, pages 447–450); SAC ¶¶ 5.659–5.776 (Leander's alleged gossip and defamatory statements, including 5.775, pages 332–366)

Campbell; Leander; Odderson; club members; Gossip at club (post-August 2020)

RFP No. 4: Public Argument Records: All documents, reports, or communications related to the "clamorous and public argument" between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of December 17, 2021, including witness statements, incident logs, or correspondence about the incident, from December 17, 2021 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COAs 43–44: Hostile Environment as alleged in SAC ¶¶ 5.891–5.898; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to argument records, and any claim of undue burden must be substantiated under CR 26(c).

43–44: Hostile Environment

SAC ¶¶ 5.891–5.898 (Matthiesen's public argument with Campbell, pages 434–436); SAC ¶¶ 5.926–5.938 (Odderson's board role during the incident, pages 447–450); SAC ¶¶ 5.659–5.776 (Leander's influence, pages 332–366)

Campbell; Matthiesen; Leander; December 17, 2021 public argument

RFP No. 5: Employment Termination Records: All documents related to Plaintiff's termination from employment at the Swedish Club, including personnel files, performance reviews, disciplinary records, emails, meeting notes, or communications involving Kristine Leander or other Defendants, Swedish Club employees, board members, or third parties, from March 1, 2021 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COAs 45–47: Wrongful Termination and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.174–5.177, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to termination records, and any claim of undue burden must be substantiated under CR 26(c).

45–47: Wrongful Termination;
27: Aiding and Abetting

SAC ¶¶ 5.926–5.938 (Odderson's board oversight, pages 447–450); SAC ¶¶ 5.174–5.177 (employment termination practices, pages 91–92); SAC ¶¶ 5.319–5.479 (Campbell's termination claims, pages 194–242); SAC ¶¶ 5.899–5.925 (Alaimo's oversight, pages 437–446)

Campbell; Leander; Odderson; Alaimo; Employment termination (post-March 2021)

RFP No. 6: All documents related to Plaintiff's exclusion from the Swedish Club as a member, including membership records, board minutes, board directors'/executive directors' emails between each other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff's membership or Kristine Leander, or communications involving Kristine Leander or other Defendants, Swedish Club employees, board members, or third parties, from August 15, 2020 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56: Retaliation and COAs 8-12: Discrimination as alleged in SAC ¶¶ 5.18-5.52, 5.659-5.776; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to exclusion records, and any claim of undue burden must be substantiated under CR 26(c).

56: Retaliation, 8-12:
Discrimination

SAC ¶¶ 5.926-5.938
(Odderson's board role, pages 447-450); SAC ¶¶ 5.18-5.52 (membership exclusion policies, pages 7-13); SAC ¶¶ 5.659-5.776 (Leander's role, including 5.775, pages 332-366)

Campbell; Leander; Odderson;
Membership exclusion (post-August 2020)

RFP No. 7: All documents evidencing any plan, agreement, or "scheme" by Kristine Leander or other Defendants to terminate Plaintiff's employment or revoke Plaintiff's membership, as alleged in the Letter, including internal communications or directives, from December 1, 2021 to the present; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56: Retaliation and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.659-5.776, 5.899-5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to scheme documents, and any claim of undue burden must be substantiated under CR 26(c).

56: Retaliation, 27: Aiding and
Abetting

SAC ¶¶ 5.926-5.938
(Odderson's board role, pages 447-450); SAC ¶¶ 5.659-5.776 (Leander's scheme, including 5.775, pages 332-366); SAC ¶¶ 5.319-5.479 (Campbell's advocacy, pages 194-242); SAC ¶¶ 5.899-5.925 (Alaimo's role, pages 437-446)

Campbell; Leander; Odderson;
Alaimo; Termination scheme (post-December 2021)

RFP No. 8: All communications between Defendants from October 1, 2020 to the present discussing Plaintiff, the Letter, or the claims in this lawsuit; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to SAC ¶¶ 5.319-5.479; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to defendant communications, and any claim of undue burden must be substantiated under CR 26(c).

N/A

SAC ¶¶ 5.926-5.938
(Odderson's board discussions, pages 447-450); SAC ¶¶ 5.319-5.479 (Campbell's lawsuit claims, pages 194-242); SAC ¶¶ 5.659-5.776 (Letter context, pages 332-366)

Campbell; Odderson; Group 3
Defendants; Lawsuit discussions (post-October 2020)

RFP No. 9: All emails, text messages, or other written communications sent or received by you between January 1, 2021, and the present relating to your resignation from the Swedish Club Board of Directors; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.926-5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to communications about resignation, and any claim of undue burden must be substantiated under CR 26(c).

N/A

SAC ¶¶ 5.926-5.938
(Odderson's resignation context, pages 447-450); SAC ¶¶ 5.195-5.318 (club governance issues, pages 104-189)

Odderson; board members;
Communications about resignation (2021-present)

D Group 3 - Ib Odderson
Discovery Summary

RFP No. 10: A copy of your resignation letter or any written notice of resignation submitted to the Swedish Club, including any drafts thereof; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.926–5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to the resignation letter, and any claim of undue burden must be substantiated under CR 26(c).

N/A

SAC ¶¶ 5.926–5.938
(Odderson's resignation, pages 447–450)

Odderson; Resignation letter
(date unspecified)

RFP No. 11: All responses you received from board members, Swedish Club staff, or members regarding your resignation, whether in writing or electronic form; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.926–5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to responses to resignation, and any claim of undue burden must be substantiated under CR 26(c).

N/A

SAC ¶¶ 5.926–5.938
(Odderson's resignation, pages 447–450); SAC ¶¶ 5.195–5.318
(club governance, pages 104–189)

Odderson; board members;
staff; Responses to resignation

RFP No. 12: Any records, emails, or notes in your possession reflecting discussions about the Swedish Club's finances, management, or Elizabeth Campbell's treatment during your tenure; **Legal Foundation:** CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.195–5.318 and 5.319–5.479; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to concerns about operations and treatment of Campbell, and any claim of undue burden must be substantiated under CR 26(c).

43–44: Hostile Environment;
45–47: Wrongful Termination;
56: Retaliation

SAC ¶¶ 5.926–5.938
(Odderson's board role, pages 447–450); SAC ¶¶ 5.195–5.318
(club operations and finances, pages 104–189); SAC ¶¶ 5.319–5.479 (Campbell's treatment and claims, pages 194–242)

Odderson; Campbell; Leander;
board members; Concerns
during tenure

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D Group 3 - Ib Odderson
Discovery Summary

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