

D Group 3 - M Johansson
Discovery Summary

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
Interrogatory No. 1: State knowledge of the person or entity who wrote or sent the Letter to Plaintiff, including identity and how knowledge was obtained, from July 1, 2024 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery of information relevant to COA 50: Defamation as alleged in SAC § V; 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).	50: Defamation	SAC § V (Leander's alleged harassment and defamatory statements); § V (Johansson's board role, potentially aware of club communications).	Campbell, Leander; Letter transmission (post-July 2024).
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 § V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to Johansson's involvement in the Letter, and any claim of undue burden must be substantiated under CR 26(c).	50: Defamation	SAC § V (Leander's alleged scheme and defamatory actions); § V (Johansson's board activities, potentially overseeing communications).	Campbell, Leander, Johansson; Letter drafting/sending (post-December 2024).
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 § V; 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).	56: Retaliation, 8–12: Discrimination	SAC § V (Johansson's board role in club decisions); § V (Leander's retaliatory actions); § V (membership termination practices).	Campbell, Leander, Johansson; Membership termination (post-August 2020).
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 § V; 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).	50: Defamation	SAC § V (Johansson's board role, potentially aware of discussions); § V (Leander's alleged gossip and defamatory statements).	Campbell, Leander, Johansson, club members; Gossip at Swedish Club (post-August 2020).

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<p>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 § V; 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).</p>	<p>43–44: Hostile Environment</p>	<p>SAC § V (Johansson's board role during hostile incidents); § V (Matthiesen's public argument with Campbell); § V (Leander's influence).</p>	<p>Campbell, Matthiesen, Leander; December 17, 2021 public argument.</p>
<p>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 § V; 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).</p>	<p>45–47: Wrongful Termination, 27: Aiding and Abetting</p>	<p>SAC § V (Johansson's board oversight of club decisions); § V (employment termination practices); § V (Leander's role); § V (Alaimo's employment oversight).</p>	<p>Campbell, Leander, Johansson, Alaimo; Employment termination (post-August 2020).</p>
<p>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 § V; 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).</p>	<p>56: Retaliation, 8–12: Discrimination</p>	<p>SAC § V (Johansson's board role in club governance); § V (membership exclusion policies); § V (Leander's retaliatory actions).</p>	<p>Campbell, Leander, Johansson; Membership exclusion (post-September 2020).</p>
<p>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 § V; 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).</p>	<p>8–12: Discrimination</p>	<p>SAC § V (Johansson's board governance of club policies); § V (membership termination practices); § V (Leander's discriminatory policies).</p>	<p>Campbell, Leander, Johansson, other members; Member exclusions (post-June 2019).</p>

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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 § V; 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 § V (Johansson's board role); § V (Leander's scheme to terminate Campbell); § V (Campbell's advocacy); § V (Alaimo's role).</p>	<p>Campbell, Leander, Johansson, 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 § V; 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 § V (Johansson's board knowledge); § V (Leander's defamatory statements and retaliatory actions); Letter tied to gossip (§ V).</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 Johansson's board role as alleged in SAC § V; 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 § V (Johansson's board role and resignation context); § V (club governance issues).</p>	<p>Johansson; 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 § V; 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 § V (Johansson's board discussions, potentially involving Campbell's claims); § V (Campbell's lawsuit and mistreatment allegations).</p>	<p>Campbell, Johansson, board members; Lawsuit discussions (during Johansson's tenure).</p>

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<p>Interrogatory No. 13: Describe events, interactions, or communications with Leander, Norgren, Miller, or others preceding and influencing your resignation, including dates; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to Johansson's resignation context as alleged in SAC § V; 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).</p>	N/A	<p>SAC § V (Johansson's resignation context); § V (Leander's influence); § V (Norgren's role).</p>	<p>Johansson, Leander, Norgren, Miller; Pre-resignation interactions (pre-resignation).</p>
<p>Interrogatory No. 14: State if you raised concerns about Swedish Club's operations, personnel, cultural programming, financial transparency, or governance before resigning, including recipients and discussions; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to governance issues as alleged in SAC § V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to Johansson's concerns, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC § V (Johansson's board activities); § V (club financial and operational issues).</p>	<p>Johansson, board members; Governance concerns (pre-resignation).</p>
<p>RFP No. 1: Produce all documents, communications, or drafts related to the creation, sending, or receipt of the Letter, including envelopes, notes, or correspondence, from December 1, 2024 to present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 50: Defamation as alleged in SAC § V; 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).</p>	50: Defamation	<p>SAC § V (Leander's alleged scheme and defamatory statements); § V (Johansson's board role, potentially overseeing correspondence).</p>	<p>Campbell, Leander; Letter creation (post-December 2024).</p>
<p>RFP No. 2: Produce all documents, including emails, texts, memos, or notes, authored by or involving Leander mentioning Plaintiff, her employment, or membership, from August 15, 2020 to 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 § V; 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).</p>	56: Retaliation, 50: Defamation	<p>SAC § V (Johansson's board role, potentially aware of communications); § V (Leander's communications targeting Campbell).</p>	<p>Campbell, Leander; Leander's communications (post-August 2020).</p>

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<p>RFP No. 3: Produce all documents reflecting statements or gossip about Plaintiff by Leander, other Defendants, or third parties, including dates and recipients, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 50: Defamation as alleged in SAC § V; 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).</p>	50: Defamation	SAC § V (Johansson's board role, potentially aware of discussions); § V (Leander's alleged gossip and defamatory statements).	Campbell, Leander, Johansson, club members; Gossip at club (post-August 2020).
<p>RFP No. 4: Produce all documents related to the December 17, 2021 argument between Plaintiff and Matthiesen, including witness statements, incident logs, or correspondence, from December 17, 2021 to 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).</p>	43–44: Hostile Environment	SAC ¶¶ 5.891–5.898 (Matthiesen's public argument with Campbell, pages 434–436); ¶¶ 5.948–5.953 (Johansson's board role during the incident, pages 451–452); ¶¶ 5.659–5.776 (Leander's influence, pages 332–366).	Campbell, Matthiesen, Leander; December 17, 2021 public argument.
<p>RFP No. 5: Produce all documents related to Plaintiff's employment termination, including personnel files, reviews, disciplinary records, emails, or notes, from March 1, 2021 to 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).</p>	45–47: Wrongful Termination, 27: Aiding and Abetting	SAC ¶¶ 5.948–5.953 (Johansson's board oversight, pages 451–452); ¶¶ 5.174–5.177 (employment termination practices, pages 91–92); ¶¶ 5.319–5.479 (Campbell's termination claims, pages 194–242); ¶¶ 5.899–5.925 (Alaimo's oversight, pages 437–446).	Campbell, Leander, Johansson, Alaimo; Employment termination (post-March 2021).
<p>RFP No. 6: Produce all documents related to Plaintiff's membership exclusion, including membership records, board minutes, emails, or notices, from August 15, 2020 to 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).</p>	56: Retaliation, 8–12: Discrimination	SAC ¶¶ 5.948–5.953 (Johansson's board role, pages 451–452); ¶¶ 5.18–5.52 (membership exclusion policies, pages 7–13); ¶¶ 5.659–5.776 (Leander's role, including 5.775, pages 332–366).	Campbell, Leander, Johansson; Membership exclusion (post-August 2020).

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<p>RFP No. 7: Produce all documents evidencing any plan or scheme by Leander or others to terminate Plaintiff's employment or membership, including communications, from December 1, 2021 to 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).</p>	<p>56: Retaliation, 27: Aiding and Abetting</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson's board role, pages 451–452); ¶¶ 5.659–5.776 (Leander's scheme, 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, Johansson, Alaimo; Termination scheme (post-December 2021).</p>
<p>RFP No. 8: Produce all communications between Defendants discussing Plaintiff, the Letter, or lawsuit claims, from October 1, 2020 to present; 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).</p>	<p>N/A</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson's board discussions, pages 451–452); ¶¶ 5.319–5.479 (Campbell's lawsuit claims, pages 194–242); ¶¶ 5.659–5.776 (Letter context, pages 332–366).</p>	<p>Campbell, Johansson, Group 3 Defendants; Lawsuit discussions (post-October 2020).</p>
<p>RFP No. 9: Produce 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 ¶¶ 5.948–5.953; 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).</p>	<p>N/A</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson's resignation context, pages 451–452); ¶¶ 5.195–5.318 (club governance issues, pages 104–189)</p>	<p>Johansson, board members; Communications about resignation (2021-present)</p>
<p>RFP No. 10: Produce 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 ¶¶ 5.948–5.953; 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).</p>	<p>N/A</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson's resignation, pages 451–452)</p>	<p>Johansson; Resignation letter (date unspecified)</p>

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<p>RFP No. 11: Produce 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 ¶¶ 5.948–5.953; 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).</p>	<p style="text-align: center;">N/A</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson’s resignation, pages 451–452); ¶¶ 5.195–5.318 (club governance, pages 104–189)</p>	<p>Johansson, board members, staff; Responses to resignation</p>
<p>RFP No. 12: Produce all communications between you and any Swedish Club board member or executive director from January 1, 2021, to the present discussing your resignation or Swedish Club board matters; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.948–5.953 and 5.195–5.318; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to board communications, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p style="text-align: center;">N/A</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson’s board communications, pages 451–452); ¶¶ 5.195–5.318 (club operational issues, pages 104–189)</p>	<p>Johansson, board members, Norgren; Board communications (2021-present)</p>
<p>RFP No. 13: Produce any documents, emails, or notes in your possession reflecting concerns about the Swedish Club’s operations, finances, the treatment of Elizabeth Campbell during your tenure, or about this lawsuit; 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部分: 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).</p>	<p>43–44: Hostile Environment, 45–47: Wrongful Termination, 56: Retaliation</p>	<p>SAC ¶¶ 5.948–5.953 (Johansson’s board role, pages 451–452); ¶¶ 5.195–5.318 (club operations and finances, pages 104–189); ¶¶ 5.319–5.479 (Campbell’s treatment and claims, pages 194–242)</p>	<p>Johansson, Campbell, Leander, board members; Concerns during tenure</p>