

D Group 3 - Molly Smith
Discovery Summary

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Knowledge of the Letter’s author from July 1, 2024 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit 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 tailored to Letter authorship, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 15: Defamation	SAC ¶¶ 5.582–5.601; 5.659–5.776	Campbell; Leander; Smith; Letter transmission (post-July 2024)
<p>Interrogatory No. 2: Involvement in authoring or sending the Letter from December 1, 2024 to present; Legal Foundation: Same as above</p>	COA 15: Defamation	Same as above	Campbell; Leander; Smith; Letter drafting/sending (post-December 2024)
<p>Interrogatory No. 3: Actions by Leander or others related to Plaintiff’s membership termination from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.18–5.52; 5.582–5.601; 5.659–5.776	Campbell; Leander; Smith; Membership termination (post-August 2020)
<p>Interrogatory No. 4: Instances of discussions about Plaintiff with club members or staff from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit 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 tailored to defamatory statements, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 15: Defamation	SAC ¶¶ 5.582–5.601; 5.659–5.776	Campbell; Leander; Smith; club members; Gossip (post-August 2020)
<p>Interrogatory No. 5: Knowledge of the December 17, 2021 argument with Matthiesen from January 1, 2021 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.481–5.502; 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>	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.582–5.601; 5.891–5.898; 5.481–5.502	Campbell; Matthiesen; Leander; Smith; December 17, 2021 argument
<p>Interrogatory No. 6: Actions contributing to Plaintiff’s employment termination from August 1, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation, and COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.319–5.479, 5.481–5.502; 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>	COAs 39–44: Discrimination and Retaliation; COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.582–5.601; 5.174–5.177; 5.319–5.479; 5.481–5.502	Campbell; Leander; Smith; Employment termination (post-August 2020)

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<p>Interrogatory No. 7: Decisions leading to Plaintiff's membership exclusion from September 1, 2020 to present; Legal Foundation: Same as Interrogatory No. 3</p>	<p>COAs 39-44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.18-5.52; 5.582-5.601; 5.659-5.776</p>	<p>Campbell; Leander; Smith; Membership exclusion (post-September 2020)</p>
<p>Interrogatory No. 8: Decisions for any member's exclusion from June 1, 2019 to present; Legal Foundation: Same as Interrogatory No. 3</p>	<p>COAs 39-44: Discrimination and Retaliation</p>	<p>Same as above</p>	<p>Campbell; Leander; Smith; other members; Member exclusions (post-June 2019)</p>
<p>Interrogatory No. 9: Plans to terminate Plaintiff's employment or membership from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39-44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.659-5.776, 5.319-5.479; 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>COAs 39-44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.659-5.776; 5.319-5.479; 5.582-5.601</p>	<p>Campbell; Leander; Smith; Termination plans (post-August 2020)</p>
<p>Interrogatory No. 10: Individuals with knowledge of Letter events from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 15: Defamation and COAs 39-44: Discrimination and 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>COA 15: Defamation; COAs 39-44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.659-5.776; 5.582-5.601</p>	<p>Campbell; Leander; Smith; club members; Letter-related events (post-August 2020)</p>
<p>Interrogatory No. 11: Statements made about Campbell from January 1, 2022 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit 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 tailored to statements about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COA 15: Defamation</p>	<p>SAC ¶¶ 5.659-5.776; 5.582-5.601</p>	<p>Campbell; Leander; Smith; Statements about Campbell (post-January 2022)</p>
<p>Interrogatory No. 12: Expression of fear on March 1, 2023; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45-46: Hostile Work Environment as alleged in SAC ¶¶ 5.481-5.502; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to specific statements, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 45-46: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481-5.502; 5.582-5.601</p>	<p>Campbell; Smith; Expression of fear (March 1, 2023)</p>
<p>Interrogatory No. 13: Role in administrative leave decision on March 3, 2023; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39-44: Discrimination and Retaliation 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 administrative actions, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39-44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319-5.479; 5.582-5.601</p>	<p>Campbell; Smith; Administrative leave (March 3, 2023)</p>
<p>Interrogatory No. 14: Role in termination decision; Legal Foundation: Same as Interrogatory No. 13</p>	<p>COAs 39-44: Discrimination and Retaliation</p>	<p>Same as above</p>	<p>Campbell; Smith; Termination decision</p>

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<p>Interrogatory No. 15: Communications regarding Campbell from January 1, 2022 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 15: Defamation and COAs 39–44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.659–5.776, 5.319–5.479; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to communications about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COA 15: Defamation; COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.659–5.776; 5.319–5.479; 5.582–5.601</p>	<p>Campbell; Leander; Smith; board members; Communications about Campbell (post-January 2022)</p>
<p>Interrogatory No. 16: Knowledge of March 1, 2023 incident; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.481–5.502; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to specific incidents, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 45–46: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.502; 5.582–5.601</p>	<p>Campbell; Lucas; Smith; March 1, 2023 incident</p>
<p>Interrogatory No. 17: Statements about March 1, 2023 incident; Legal Foundation: Same as Interrogatory No. 16</p>	<p>COAs 45–46: Hostile Work Environment</p>	<p>Same as above</p>	<p>Campbell; Lucas; Smith; Statements about incident</p>
<p>Interrogatory No. 18: Knowledge of Leander’s treatment of Campbell; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and 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 Leander’s treatment, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.659–5.776; 5.582–5.601</p>	<p>Campbell; Leander; Smith; Leander’s treatment of Campbell</p>
<p>Interrogatory No. 19: Involvement in election rigging in April 2022; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.62–5.90; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to election activities, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.62–5.90; 5.582–5.601</p>	<p>Campbell; Smith; board members; April 2022 election rigging</p>
<p>Interrogatory No. 20: Awareness of statements during April 20, 2022 meeting; Legal Foundation: Same as Interrogatory No. 19</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>Same as above</p>	<p>Campbell; Sund; Smith; Statements during April 20, 2022 meeting</p>
<p>Interrogatory No. 21: General behavior towards others; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.481–5.502; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to general behavior, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 45–46: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.502; 5.582–5.601</p>	<p>Campbell; Smith; other members/employees; Intimidating/threatening behavior</p>

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<p>RFP No. 1: Documents related to the Letter from December 1, 2024 to present; Legal Foundation: CR 26(b)(1) and CR 34 permit 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 tailored to Letter documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 15: Defamation	SAC ¶¶ 5.582–5.601; 5.659–5.776	Campbell; Leander; Smith; Letter documents (post-December 2024)
<p>RFP No. 2: Communications by Leander mentioning Plaintiff from August 15, 2020 to present; Legal Foundation: Same as RFP No. 1</p>	COA 15: Defamation	Same as above	Campbell; Leander; Smith; Leander’s communications
<p>RFP No. 3: Documents reflecting gossip about Plaintiff from August 15, 2020 to present; Legal Foundation: Same as RFP No. 1</p>	COA 15: Defamation	Same as above	Campbell; Leander; Smith; Gossip documents
<p>RFP No. 4: Documents related to the December 17, 2021 argument from December 17, 2021 to present; Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.481–5.502; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to incident documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.582–5.601; 5.891–5.898; 5.481–5.502	Campbell; Matthiesen; Leander; Smith; Argument documents (December 17, 2021)
<p>RFP No. 5: Documents related to Plaintiff’s employment termination from March 1, 2021 to present; Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 termination documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.582–5.601; 5.174–5.177; 5.319–5.479	Campbell; Leander; Smith; Termination documents (post-March 2021)
<p>RFP No. 6: Documents related to Plaintiff’s membership exclusion from August 15, 2020 to present; Legal Foundation: Same as RFP No. 5</p>	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Leander; Smith; Membership exclusion documents (post-August 2020)
<p>RFP No. 7: Documents evidencing schemes to terminate Plaintiff’s employment or membership from December 1, 2021 to present; Legal Foundation: Same as RFP No. 5</p>	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Leander; Smith; Scheme documents (post-December 2021)
<p>RFP No. 8: Defendant Communications Seeks all communications among defendants from October 1, 2020, to present discussing the plaintiff, the Letter, or lawsuit claims. It aims to uncover coordinated efforts or discussions related to the plaintiff’s allegations.</p>	COA 15: Defamation; COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting	SAC ¶¶ 5.659–5.776; 5.319–5.479; 5.899–5.925; 5.582–5.601	Elizabeth Campbell; Defendants; Communications about Plaintiff, Letter, or lawsuit (Oct 2020 - present)
<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 15: Defamation, COAs 39–44: Discrimination and Retaliation, and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.659–5.776, 5.319–5.479, 5.899–5.925; 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>			

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<p>RFP No. 9: Communications About Ms. Campbell</p> <p>Requests documents with statements by Smith about Elizabeth A. Campbell from January 1, 2022, to present, including emails, texts, and recordings. It targets potential defamatory remarks made by Smith.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit 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 tailored to statements about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COA 15: Defamation</p>	<p>SAC ¶¶ 5.659–5.776; 5.582–5.601</p>	<p>Elizabeth Campbell; Molly Olson Smith; Statements about Campbell (Jan 2022 - present)</p>
<p>RFP No. 10: Board Meeting Records</p> <p>Seeks minutes, agendas, and recordings of Swedish Club board meetings from January 1, 2022, to present, especially those discussing Campbell. It aims to reveal board discussions related to her employment or membership.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 meeting records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319–5.479; 5.582–5.601; 5.926–5.938</p>	<p>Elizabeth Campbell; Swedish Club Board; Board meetings discussing Campbell (Jan 2022 - present)</p>
<p>RFP No. 11: Investigation Documents</p> <p>Requests documents related to investigations of Elizabeth A. Campbell, including reports and witness statements. It seeks evidence of inquiries into her conduct or workplace issues.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.481–5.502; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to investigation documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 45–46: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.502; 5.582–5.601</p>	<p>Elizabeth Campbell; Molly Olson Smith; Investigations regarding Campbell</p>
<p>RFP No. 12: Termination Decision Documents</p> <p>Seeks documents on the decision to place Campbell on administrative leave and terminate her employment and membership, including emails and meeting notes. It targets evidence of discriminatory or retaliatory intent.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 termination decision documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319–5.479; 5.582–5.601</p>	<p>Elizabeth Campbell; Molly Olson Smith; Swedish Club Board; Termination decision (Jan 2023 - present)</p>
<p>RFP No. 13: Personal Records</p> <p>Requests personal notes, diaries, or journals by Smith mentioning Campbell or her termination events. It aims to uncover private records that may reveal Smith’s perspective or intent.</p>			<p>Elizabeth Campbell; Molly</p>

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<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 personal records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319–5.479; 5.582–5.601</p>	<p>Olson Smith; Personal records mentioning Campbell or termination</p>
<p>RFP No. 14: Communications with Kristine Leander</p>			
<p>Seeks all communications between Smith and Kristine Leander regarding Elizabeth A. Campbell. It targets discussions that may involve defamatory or retaliatory content.</p>			
<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 15: Defamation, COAs 39–44: Discrimination and Retaliation, and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.659–5.776, 5.319–5.479, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to communications with Leander, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COA 15: Defamation; COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting</p>	<p>SAC ¶¶ 5.659–5.776; 5.319–5.479; 5.899–5.925; 5.582–5.601</p>	<p>Elizabeth Campbell; Kristine Leander; Molly Olson Smith; Communications about Campbell</p>
<p>RFP No. 15: Communications with Sarah Alaimo</p>			
<p>Requests all communications between Smith and Sarah Alaimo regarding Elizabeth A. Campbell. It seeks evidence of discussions that may relate to Campbell’s termination or membership issues.</p>			
<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 communications with Alaimo, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319–5.479; 5.582–5.601; 5.899–5.925</p>	<p>Elizabeth Campbell; Sarah Alaimo; Molly Olson Smith; Communications about Campbell</p>
<p>RFP No. 16: Communications with Other Defendants</p>			
<p>Seeks all communications between Smith and other defendants regarding Elizabeth A. Campbell. It aims to uncover coordinated actions or discussions about the plaintiff.</p>			
<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 communications with other defendants, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319–5.479; 5.582–5.601</p>	<p>Elizabeth Campbell; Molly Olson Smith; Other defendants; Communications about Campbell</p>
<p>RFP No. 17: Election-Related Documents</p>			
<p>Requests documents related to the April 2022 Swedish Club board election, including nomination materials and meeting records. It targets evidence of discriminatory practices during the election process.</p>			<p>Elizabeth Campbell; Gary Sund</p>

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<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.832–5.864; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to election-related documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.832–5.864; 5.582–5.601</p>	<p>Elizabeth Campbell, Cary Sana, Shama Albright; Swedish Club Board; April 2022 board election</p>
<p>RFP No. 18: Complaints Against You Seeks documents on complaints against Smith by Swedish Club members or employees, including written complaints and investigation records. It aims to identify patterns of hostile behavior.</p>			
<p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.481–5.502; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to complaints against the defendant, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>COAs 45–46: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.502; 5.582–5.601</p>	<p>Molly Olson Smith; Swedish Club members/employees; Complaints against Smith</p>