

D Group 3 - Neil Snyder  
Defendant Discovery Summary

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<b>Interrogatory No. 1:</b> 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; <b>Legal Foundation:</b> 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).	50: Defamation	SAC ¶¶ 5.659–5.776 (Leander’s alleged harassment and defamatory statements, including 5.775, pages 332–366); Letter not in SAC, tied to Leander’s gossip (¶¶ 5.659–5.670, pages 332–335).	Campbell, Leander; Letter transmission (post-July 2024).
<b>Interrogatory No. 2:</b> 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; <b>Legal Foundation:</b> 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 Snyder’s involvement in the Letter, 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 actions, including 5.775, pages 332–366); Letter tied to Leander’s actions (¶¶ 5.659–5.670, pages 332–335).	Campbell, Leander, Snyder; Letter drafting/sending (post-December 2024).
<b>Interrogatory No. 3:</b> 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; <b>Legal Foundation:</b> 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).	56: Retaliation, 8–12: Discrimination	SAC ¶¶ 5.271–5.275 (Snyder’s financial oversight as treasurer, potentially linked to club decisions, pages 174–175), ¶¶ 5.659–5.776 (Leander’s retaliatory actions against Campbell’s advocacy, including 5.775, pages 332–366), ¶¶ 5.18–5.52 (membership termination practices, pages 7–13).	Campbell, Leander, Snyder; Membership termination (post-August 2020).
<b>Interrogatory No. 4:</b> 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; <b>Legal Foundation:</b> 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).	50: Defamation	SAC ¶¶ 5.271–5.275 (Snyder’s role in board governance, potentially aware of discussions, pages 174–175), ¶¶ 5.659–5.776 (Leander’s alleged gossip and defamatory statements about Campbell, including 5.775, pages 332–366).	Campbell, Leander, Snyder, club members; Gossip at Swedish Club (post-August 2020).

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<p><b>Interrogatory No. 5:</b> 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; <b>Legal Foundation:</b> 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).</p>	<p>43-44: Hostile Environment</p>	<p>SAC ¶¶ 5.271-5.275 (Snyder's board role during hostile incidents, pages 174-175), ¶¶ 5.891-5.898 (Matthiesen's public argument with Campbell, pages 434-436), ¶¶ 5.659-5.776 (Leander's alleged influence, pages 332-366).</p>	<p>Campbell, Matthiesen, Leander; December 17, 2021 public argument.</p>
<p><b>Interrogatory No. 6:</b> 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; <b>Legal Foundation:</b> 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).</p>	<p>45-47: Wrongful Termination, 27: Aiding and Abetting</p>	<p>SAC ¶¶ 5.271-5.275 (Snyder's financial oversight linked to club decisions, pages 174-175), ¶¶ 5.174-5.177 (employment termination practices, pages 91-92), ¶¶ 5.659-5.776 (Leander's role in termination, pages 332-366), ¶¶ 5.899-5.925 (Alaimo's employment oversight, pages 437-446).</p>	<p>Campbell, Leander, Snyder, Alaimo; Employment termination (post-August 2020).</p>
<p><b>Interrogatory No. 7:</b> 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; <b>Legal Foundation:</b> 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).</p>	<p>56: Retaliation, 8-12: Discrimination</p>	<p>SAC ¶¶ 5.271-5.275 (Snyder's board actions as treasurer, pages 174-175), ¶¶ 5.18-5.52 (membership exclusion policies, pages 7-13), ¶¶ 5.659-5.776 (Leander's retaliatory actions, including 5.775, pages 332-366).</p>	<p>Campbell, Leander, Snyder; Membership exclusion (post-September 2020).</p>
<p><b>Interrogatory No. 8:</b> 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; <b>Legal Foundation:</b> 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).</p>	<p>8-12: Discrimination</p>	<p>SAC ¶¶ 5.271-5.275 (Snyder's governance role in club policies, pages 174-175), ¶¶ 5.18-5.52 (membership termination practices, pages 7-13), ¶¶ 5.659-5.776 (Leander's discriminatory policies, pages 332-366).</p>	<p>Campbell, Leander, Snyder, other members; Member exclusions (post-June 2019).</p>

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<p><b>Interrogatory No. 9:</b> 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; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's board involvement, pages 174–175), ¶¶ 5.659–5.776 (Leander's alleged scheme to terminate Campbell, including 5.775, pages 332–366), ¶¶ 5.319–5.479 (Campbell's advocacy triggering retaliation, pages 194–242), ¶¶ 5.899–5.925 (Alaimo's role in employment decisions, pages 437–446).</p>	<p>Campbell, Leander, Snyder, Alaimo; Termination scheme (post-August 2020).</p>
<p><b>Interrogatory No. 10:</b> Identify individuals with knowledge of events or statements in the Letter, including Leander's actions toward Plaintiff, from August 15, 2020 to present; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's board knowledge, pages 174–175), ¶¶ 5.659–5.776 (Leander's alleged 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><b>Interrogatory No. 11:</b> State the date you resigned from the Swedish Club Board and explain all reasons for your resignation; <b>Legal Foundation:</b> CR 26(b)(1) and CR 33 permit discovery relevant to Snyder's board role as alleged in SAC ¶¶ 5.271–5.275; 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 ¶¶ 5.271–5.275 (Snyder's treasurer role and resignation context, potentially linked to financial mismanagement, pages 174–175), ¶¶ 5.195–5.318 (club financial issues prompting resignation, pages 104–189).</p>	<p>Snyder; Resignation from board (date unspecified).</p>
<p><b>Interrogatory No. 12:</b> State if you discussed Plaintiff's lawsuit, membership, employment termination, or mistreatment with board members during your tenure, including dates and participants; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's board discussions, potentially involving Campbell's claims, pages 174–175), ¶¶ 5.319–5.479 (Campbell's lawsuit and mistreatment allegations, pages 194–242).</p>	<p>Campbell, Snyder, board members; Lawsuit discussions (during Snyder's tenure).</p>
<p><b>Interrogatory No. 13:</b> Describe events, interactions, or communications with Leander, Norgren, Miller, or others preceding and influencing your resignation, including dates; <b>Legal Foundation:</b> CR 26(b)(1) and CR 33 permit discovery relevant to Snyder's resignation context as alleged in SAC ¶¶ 5.271–5.275; 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>	<p>N/A</p>	<p>SAC ¶¶ 5.271–5.275 (Snyder's resignation context, potentially influenced by mismanagement, pages 174–175), ¶¶ 5.659–5.776 (Leander's influence, including 5.775, pages 332–366), ¶¶ 5.865–5.890 (Norgren's role in club operations, pages 426–432).</p>	<p>Snyder, Leander, Norgren, Miller; Pre-resignation interactions (pre-resignation).</p>

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<p><b>Interrogatory No. 14:</b> State if you raised concerns about Swedish Club's operations, personnel, cultural programming, financial transparency, or governance before resigning, including recipients and discussions; <b>Legal Foundation:</b> CR 26(b)(1) and CR 33 permit discovery relevant to financial mismanagement 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 Snyder's concerns, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.271–5.275 (Snyder's financial mismanagement as treasurer, pages 174–175); ¶¶ 5.195–5.318 (club financial and operational issues, pages 104–189).</p>	<p>Snyder, board members; Financial transparency concerns (pre-resignation).</p>
<p><b>Interrogatory No. 15:</b> Identify any co-defendant asserting a different position than the Group 3 Answer and specify the variance; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's consistency in denying SAC ¶¶ 5.2–5.5 (Answer ¶ 5.2.1, page 12); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to co-defendant positions, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment oversight, supporting COA 27: Aiding and Abetting, pages 437–446); ¶¶ 5.865–5.890 (Norgren's executive director role in club operations, pages 426–432); ¶¶ 5.271–5.275 (Snyder's financial oversight, potentially linked to mismanagement, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 16:</b> For each denied Complaint paragraph (e.g., 1.3, 5.976), state the factual basis, including facts, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's denial of SAC ¶¶ 1.3, 5.976 (Answer ¶¶ 1.3, page 3; 5.976, page 458); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to denial details, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27: Aiding and Abetting, pages 437–446); ¶¶ 5.319–5.479 (Campbell's claims of discrimination and retaliation, pages 194–242); ¶¶ 5.954–5.976 (wage claims, pages 451–458).</p>	<p>Alaimo, Campbell; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 17:</b> For denials of roles or employment (e.g., Complaint Section 4), describe your roles, employment, and agency relationships, including facts, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's denial of SAC ¶¶ 5.2–5.5 (Answer ¶ 5.2.3, page 12); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to role details, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren's executive director role, pages 426–432); ¶¶ 5.271–5.275 (Snyder's treasurer role, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 18:</b> For denials of COAs (e.g., Complaint Sections 11.2–84.3), identify elements not met and factual basis, including facts, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's denial of COAs (Answer ¶¶ 8.2–56.8, pages 149–154); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to COA denials, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's actions, supporting COA 27: Aiding and Abetting, pages 437–446); ¶¶ 5.319–5.479 (Campbell's COA allegations, e.g., discrimination, retaliation, pages 194–242); ¶¶ 5.865–5.890 (Norgren's role in operations, pages 426–432).</p>	<p>Alaimo, Campbell, Norgren; Answer filing (April 4, 2025).</p>

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<p><b>Interrogatory No. 19:</b> Describe the factual and legal basis for charitable immunity defense, including statutes, qualifications, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.165); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to defense details, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.865–5.890 (Norgren's nonprofit oversight, pages 426–432); ¶¶ 5.271–5.275 (Snyder's financial management, pages 174–175); ¶¶ 5.899–5.925 (Alaimo's role, supporting COA 27, pages 437–446).</p>	<p>Norgren, Snyder, Alaimo; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 20:</b> Identify independent, intervening, or superseding acts causing Plaintiff's injuries, including acts, persons, dates, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.165); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to intervening acts, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's injury claims, pages 194–242); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Campbell, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 21:</b> Describe Plaintiff's preexisting conditions, their relation to injuries, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to preexisting conditions, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.331–5.352 (Campbell's protected status, e.g., disability, pages 199–208); ¶¶ 5.271–5.275 (Snyder's role, pages 174–175).</p>	<p>Alaimo, Campbell, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 22:</b> Describe Plaintiff's actions or omissions constituting failure to mitigate damages, including dates, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to mitigation efforts, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's damages claims, pages 194–242); ¶¶ 5.865–5.890 (Norgren's oversight, pages 426–432).</p>	<p>Alaimo, Campbell, Norgren; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 23:</b> Identify persons or entities for fault allocation under RCW 4.22.070, including percentages, factual basis, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to fault allocation, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's role, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); ¶¶ 5.926–5.938 (Odderson's board actions, pages 447–450).</p>	<p>Alaimo, Campbell, Odderson; Answer filing (April 4, 2025).</p>

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<p><b>Interrogatory No. 24:</b> Describe intentional misconduct by others causing Plaintiff's injuries, including acts, persons, dates, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to misconduct details, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27, pages 437–446); ¶¶ 5.659–5.776 (Leander's actions, pages 332–366); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Leander, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 25:</b> Identify COAs failing to state a claim, including legal or factual deficiencies, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to claim deficiencies, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's COAs, e.g., retaliation, pages 194–242); ¶¶ 5.865–5.890 (Norgren's role, pages 426–432).</p>	<p>Alaimo, Campbell, Norgren; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 26:</b> For Complaint paragraphs where you lacked knowledge to admit or deny, explain efforts to obtain information, including steps, persons, and documents consulted; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's lack of knowledge (Answer ¶¶ 1.14–1.15, page 4); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to investigation efforts, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren's administrative role, pages 426–432); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 27:</b> For Complaint paragraphs partially admitted and denied, specify admitted and denied parts, and provide factual basis, witnesses, and documents for denials; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's partial admissions (Answer ¶ 5.2.1, page 12); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to admission/denial details, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment role, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren's nonprofit oversight, pages 426–432); ¶¶ 5.271–5.275 (Snyder's board membership, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>Interrogatory No. 28:</b> Explain why certain Complaint paragraphs do not pertain to you, including reasons, witnesses, and documents; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's non-pertinence claims (Answer ¶¶ 1.10–1.11, page 3); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to non-pertinence reasons, and CR 33 requires detailed answers.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27: Aiding and Abetting, pages 437–446); ¶¶ 5.271–5.275 (Snyder's financial oversight, potentially linked to mismanagement, pages 174–175); ¶¶ 5.659–5.776 (Leander's actions, supporting COAs 50, 56, pages 332–366).</p>	<p>Alaimo, Snyder, Leander; Answer filing (April 4, 2025).</p>

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<p><b>RFP No. 1:</b> 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; <b>Legal Foundation:</b> 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).</p>	50: Defamation	SAC ¶¶ 5.659–5.776 (Leander's alleged scheme and defamatory statements, including 5.775, pages 332–366); Letter tied to defamatory gossip (¶¶ 5.659–5.670, pages 332–335).	Campbell, Leander; Letter creation (post-December 2024).
<p><b>RFP No. 2:</b> 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; <b>Legal Foundation:</b> 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).</p>	56: Retaliation, 50: Defamation	SAC ¶¶ 5.271–5.275 (Snyder's oversight context as treasurer, pages 174–175), ¶¶ 5.659–5.776 (Leander's communications targeting Campbell's employment and membership, including 5.775, pages 332–366).	Campbell, Leander; Leander's communications (post-August 2020).
<p><b>RFP No. 3:</b> 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; <b>Legal Foundation:</b> 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).</p>	50: Defamation	SAC ¶¶ 5.271–5.275 (Snyder's role in board governance, potentially aware of discussions, pages 174–175), ¶¶ 5.659–5.776 (Leander's alleged gossip and defamatory statements about Campbell, including 5.775, pages 332–366).	Campbell, Leander, Snyder, club members; Gossip at club (post-August 2020).
<p><b>RFP No. 4:</b> 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; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's board context, pages 174–175), ¶¶ 5.891–5.898 (Matthiesen's argument, pages 434–436), ¶¶ 5.659–5.776 (Leander's role, pages 332–366).	Campbell, Matthiesen, Leander; December 17, 2021 argument.
<p><b>RFP No. 5:</b> Produce all documents related to Plaintiff's employment termination, including personnel files, reviews, disciplinary records, emails, or notes, from March 1, 2021 to present; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's oversight, pages 174–175), ¶¶ 5.174–5.177 (employment termination, pages 91–92), ¶¶ 5.319–5.479 (Campbell's termination claims, pages 194–242), ¶¶ 5.899–5.925 (Alaimo's employment oversight, pages 437–446).	Campbell, Leander, Snyder, Alaimo; Employment termination (post-March 2021).

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<p><b>RFP No. 6:</b> Produce all documents related to Plaintiff's membership exclusion, including membership records, board minutes, emails, or notices, from August 15, 2020 to present; <b>Legal Foundation:</b> 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>	<p>56: Retaliation, 8–12: Discrimination</p>	<p>SAC ¶¶ 5.271–5.275 (Snyder's board actions, pages 174–175), ¶¶ 5.18–5.52 (membership exclusion, pages 7–13), ¶¶ 5.659–5.776 (Leander's role, including 5.775, pages 332–366).</p>	<p>Campbell, Leander, Snyder; Membership exclusion (post-August 2020).</p>
<p><b>RFP No. 7:</b> 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; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's board role, pages 174–175), ¶¶ 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, Snyder, Alaimo; Termination scheme (post-December 2021).</p>
<p><b>RFP No. 8:</b> Produce all communications between Defendants discussing Plaintiff, the Letter, or lawsuit claims, from October 1, 2020 to present; <b>Legal Foundation:</b> 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 ¶¶ 5.271–5.275 (Snyder's board discussions, pages 174–175), ¶¶ 5.319–5.479 (Campbell's lawsuit claims, pages 194–242), ¶¶ 5.659–5.776 (Letter context, pages 332–366).</p>	<p>Campbell, Snyder, Group 3 Defendants; Lawsuit discussions (post-October 2020).</p>
<p><b>RFP No. 9:</b> Produce all emails, texts, or communications sent or received by you related to your resignation from the Swedish Club Board, from January 1, 2021 to present; <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of documents relevant to SAC ¶¶ 5.271–5.275; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation communications, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>N/A</p>	<p>SAC ¶¶ 5.271–5.275 (Snyder's resignation context, pages 174–175), ¶¶ 5.195–5.318 (financial issues, pages 104–189).</p>	<p>Snyder, board members; Resignation communications (post-January 2021).</p>
<p><b>RFP No. 10:</b> Produce a copy of your resignation letter or written notice to the Swedish Club, including drafts; <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of documents relevant to SAC ¶¶ 5.271–5.275; 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 ¶¶ 5.271–5.275 (Snyder's resignation, pages 174–175), ¶¶ 5.195–5.318 (financial context, pages 104–189).</p>	<p>Snyder; Resignation letter (date unspecified).</p>



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<p><b>RFP No. 11:</b> Produce all responses from board members, staff, or members regarding your resignation, in writing or electronic form; <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of documents relevant to SAC ¶¶ 5.271–5.275; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation responses, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.271–5.275 (Snyder’s resignation, pages 174–175), ¶¶ 5.195–5.318 (club governance, pages 104–189).</p>	<p>Snyder, board members; Resignation responses (post-resignation).</p>
<p><b>RFP No. 12:</b> Produce any documents, emails, or notes reflecting concerns about Swedish Club’s operations, finances, or Plaintiff’s treatment during your tenure; <b>Legal Foundation:</b> CR 26(b)(1) and CR 34 permit production of documents relevant to SAC ¶¶ 5.195–5.318, 5.319–5.479; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to operational and treatment concerns, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.271–5.275 (Snyder’s financial mismanagement, pages 174–175), ¶¶ 5.195–5.318 (club operations and finances, pages 104–189), ¶¶ 5.319–5.479 (Campbell’s treatment, pages 194–242).</p>	<p>Snyder, Campbell; Financial and treatment concerns (during tenure).</p>
<p><b>RFP No. 13:</b> Produce documents identifying any co-defendant asserting a different position than the Group 3 Answer, specifying the variance; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer’s consistency in denying SAC ¶¶ 5.2–5.5 (Answer ¶ 5.2.1, page 12); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to co-defendant positions, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo’s employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren’s executive director role, pages 426–432); ¶¶ 5.271–5.275 (Snyder’s financial oversight, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 14:</b> Produce all documents supporting denials in the Answer, including correspondence, minutes, or statements, for paragraphs like 5.737 and 5.743; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer’s denial of SAC ¶¶ 5.737, 5.743 (Answer ¶¶ 5.737, 5.743, page 356); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to denial documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo’s employment actions, supporting COA 27, pages 437–446); ¶¶ 5.737–5.743 (Leander’s projects, e.g., catering project, pages 356–358); ¶¶ 5.271–5.275 (Snyder’s financial oversight, pages 174–175).</p>	<p>Alaimo, Leander, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 15:</b> Produce all documents related to your roles, employment, or agency relationships with the Swedish Club, including contracts or minutes; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer’s denial of SAC ¶¶ 5.2–5.5 (Answer ¶ 5.2.3, page 12); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to role documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo’s employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren’s executive director role, pages 426–432); ¶¶ 5.271–5.275 (Snyder’s treasurer duties, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>

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<p><b>RFP No. 16:</b> Produce all documents supporting denials of COAs, including records or communications related to alleged conduct; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's denial of COAs (Answer ¶¶ 8.2–56.8, pages 149–154); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to COA denial documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's COA allegations, pages 194–242); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Campbell, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 17:</b> Produce all documents supporting charitable immunity defense, including nonprofit filings or resolutions; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.165); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to defense documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's role, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren's nonprofit oversight, pages 426–432); ¶¶ 5.271–5.275 (Snyder's financial management, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 18:</b> Produce all documents supporting intervening acts defense, including incident reports or statements; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.165); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to intervening act documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's injury claims, pages 194–242); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Campbell, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 19:</b> Produce all documents supporting preexisting conditions defense, including medical records or prior complaints; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to condition documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.331–5.352 (Campbell's protected status, e.g., disability, pages 199–208); ¶¶ 5.271–5.275 (Snyder's role, pages 174–175).</p>	<p>Alaimo, Campbell, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 20:</b> Produce all documents supporting failure to mitigate defense, including communications or medical advice; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to mitigation documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's damages claims, pages 194–242); ¶¶ 5.865–5.890 (Norgren's oversight, pages 426–432).</p>	<p>Alaimo, Campbell, Norgren; Answer filing (April 4, 2025).</p>

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<p><b>RFP No. 21:</b> Produce all documents supporting allocation of fault defense under RCW 4.22.070, including fault records or statements; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to fault allocation documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's role, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); ¶¶ 5.926–5.938 (Odderson's board actions, pages 447–450).</p>	<p>Alaimo, Campbell, Odderson; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 22:</b> Produce all documents supporting misconduct of others defense, including police or disciplinary records; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to misconduct documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27, pages 437–446); ¶¶ 5.659–5.776 (Leander's actions, pages 332–366); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Leander, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 23:</b> Produce all documents supporting failure to state a claim defense, including legal memoranda; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's affirmative defense (Answer p.166); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to claim deficiency documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's actions, supporting COA 27, pages 437–446); ¶¶ 5.319–5.479 (Campbell's COAs, pages 194–242); ¶¶ 5.865–5.890 (Norgren's role, pages 426–432).</p>	<p>Alaimo, Campbell, Norgren; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 24:</b> Produce all documents related to efforts to investigate Complaint paragraphs where you lacked knowledge, including notes or emails; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's lack of knowledge (Answer ¶¶ 1.14–1.15, page 4); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to investigation documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment oversight, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren's administrative role, pages 426–432); ¶¶ 5.271–5.275 (Snyder's financial oversight, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>
<p><b>RFP No. 25:</b> Produce all documents related to admitted portions of Complaint paragraphs, including records supporting admitted facts; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's partial admissions (Answer ¶ 5.2.1, page 12); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to admission documents, and CR 34 requires production.</p>	N/A	<p>SAC ¶¶ 5.899–5.925 (Alaimo's employment role, supporting COA 27, pages 437–446); ¶¶ 5.865–5.890 (Norgren's nonprofit oversight, pages 426–432); ¶¶ 5.271–5.275 (Snyder's board membership, pages 174–175).</p>	<p>Alaimo, Norgren, Snyder; Answer filing (April 4, 2025).</p>

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<b>RFP No. 26:</b> Produce all documents supporting assertions that certain Complaint paragraphs do not pertain to you, including related records; <b>Legal Foundation:</b> CR 26(b)(1) supports discovery relevant to the Answer's non-pertinence claims (Answer ¶¶ 1.10–1.11, page 3); If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to non-pertinence documents, and CR 34 requires production.	N/A	SAC ¶¶ 5.899–5.925 (Alaimo's employment actions, supporting COA 27: Aiding and Abetting, pages 437–446); ¶¶ 5.271–5.275 (Snyder's financial oversight, potentially linked to mismanagement, pages 174–175); ¶¶ 5.659–5.776 (Leander's actions, supporting COAs 50, 56, pages 332–366).	Alaimo, Snyder, Leander; Answer filing (April 4, 2025).
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