

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
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 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 Letter authorship, and any claim of undue burden must be substantiated under CR 26(c).	COA 15: Defamation; COA 27: Aiding and Abetting	SAC ¶¶ 5.659–5.776; 5.899–5.925	Campbell; Leander; Alaimo; Letter transmission (post-July 2024)
Interrogatory No. 2: Involvement in authoring or sending the Letter from December 1, 2024 to present; Legal Foundation: Same as above	COA 15: Defamation; COA 27: Aiding and Abetting	Same as above	Campbell; Leander; Alaimo; Letter drafting/sending (post-December 2024)
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, 5.899–5.925; 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).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.18–5.52; 5.659–5.776; 5.899–5.925	Campbell; Leander; Alaimo; Membership termination (post-August 2020)
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, 5.899–5.925; 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).	COA 15: Defamation	SAC ¶¶ 5.659–5.776; 5.899–5.925	Campbell; Leander; Alaimo; club members; Gossip (post-August 2020)
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, 5.899–5.925; 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).	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.481–5.502; 5.899–5.925	Campbell; Matthiesen; Leander; Alaimo; December 17, 2021 argument

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, 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).	COAs 39–44: Discrimination and Retaliation; COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.319–5.479; 5.481–5.502; 5.899–5.925	Campbell; Leander; Alaimo; Employment termination (post-August 2020)
Interrogatory No. 7: Decisions leading to Plaintiff's membership exclusion from September 1, 2020 to present; Legal Foundation: Same as Interrogatory No. 3	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.18–5.52; 5.659–5.776; 5.899–5.925	Campbell; Leander; Alaimo; Membership exclusion (post-September 2020)
Interrogatory No. 8: Decisions for any member's exclusion from June 1, 2019 to present; Legal Foundation: Same as Interrogatory No. 3	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Leander; Alaimo; other members; Member exclusions (post-June 2019)
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, 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).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.659–5.776; 5.319–5.479; 5.899–5.925	Campbell; Leander; Alaimo; Termination plans (post-August 2020)
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, 5.899–5.925; 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).	COA 15: Defamation; COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.659–5.776; 5.899–5.925	Campbell; Leander; Alaimo; club members; Letter-related events (post-August 2020)

Interrogatory No. 11: Agreements with Swedish Club from July 1, 2022 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to contractual arrangements, and any claim of undue burden must be substantiated under CR 26(c).	COA 27: Aiding and Abetting	SAC ¶¶ 5.899–5.925	Alaimo; Swedish Club; board of directors; Lane Powell PLLC; Priya Vivian; Great American Insurance Company; agreements (post-July 2022)
Interrogatory No. 12: Role and responsibilities from October 1, 2022 to November 30, 2024; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; Swedish Club; investigative activities; HR duties; member-related duties (Oct 2022 - Nov 2024)
Interrogatory No. 13: Job titles and responsibilities from October 21, 2022 to termination; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; Swedish Club; job titles; duties; role changes (Oct 2022 - termination)
Interrogatory No. 14: Circumstances of termination; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; Swedish Club; termination circumstances; reasons; decision-makers
Interrogatory No. 15: Legal counsel post-termination; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; legal counsel; communications with Swedish Club
Interrogatory No. 16: Severance agreement; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; Swedish Club; severance terms; financial compensation
Interrogatory No. 17: Change in defendant status; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; Swedish Club; agreements; settlements; legal actions
Interrogatory No. 18: Joint defense agreement; Legal Foundation: Same as above	COA 27: Aiding and Abetting	Same as above	Alaimo; other defendants; joint defense agreement terms

Interrogatory No. 19: Interactions with Elizabeth Campbell; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation, COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.319–5.479, 5.481–5.502, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to interactions with Campbell, and any claim of undue burden must be substantiated under CR 26(c).	COAs 39–44: Discrimination and Retaliation; COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.319–5.479; 5.481–5.502; 5.899–5.925	Campbell; Alaimo; employment and membership issues; interactions (Nov 2021 - present)
Interrogatory No. 20: Decision makers in Campbell's termination; Legal Foundation: Same as above	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479; 5.899–5.925	Campbell; Alaimo; other individuals; termination decision-makers
Interrogatory No. 21: Authorization of termination letter; Legal Foundation: Same as above	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Alaimo; authorization of termination letter (March 9, 2023)
Interrogatory No. 22: Basis for November 2, 2022 warning claim; Legal Foundation: Same as above	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Alaimo; warning claim (Nov 2, 2022)
Interrogatory No. 23: Communications with Shama Albright; 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, 5.899–5.925; 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).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479; 5.899–5.925	Campbell; Alaimo; Shama Albright; communications about Campbell
Interrogatory No. 24: Communications with Molly Olson Smith; Legal Foundation: Same as above	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Alaimo; Molly Olson Smith; communications about Campbell; administrative leave; March 1, 2023 incident
Interrogatory No. 25: Communications with Elizabeth Norgren; Legal Foundation: Same as above	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Alaimo; Elizabeth Norgren; communications about Campbell
Interrogatory No. 26: Communications with the Swedish Club Board; Legal Foundation: Same as above	COAs 39–44: Discrimination and Retaliation	Same as above	Campbell; Alaimo; Swedish Club Board; communications about Campbell

<p>Interrogatory No. 27: Emotional distress allegations; 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, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to actions affecting emotional well-being, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.481–5.502; 5.899–5.925	Campbell; Alaimo; actions affecting emotional well-being
<p>Interrogatory No. 28: Financial records and incentives; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to financial incentives, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 27: Aiding and Abetting	SAC ¶¶ 5.899–5.925	Alaimo; Swedish Club; financial incentives; bonuses; performance-based compensation
<p>Interrogatory No. 29: Identify all individuals who witnessed or were present during any interactions between you and Elizabeth Campbell, including but not limited to meetings, board sessions, or informal conversations, from November 1, 2021, to the present. For each individual, provide their name, contact information, and a brief description of their role at the Swedish Club. Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation, COAs 45–46: Hostile Work Environment, and COA 15: Defamation as alleged in SAC ¶¶ 5.319–5.479, 5.481–5.502, 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 identifying witnesses to relevant interactions, 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; COA 15: Defamation	SAC ¶¶ 5.319–5.479; 5.481–5.502; 5.659–5.776; 5.899–5.925	Elizabeth Campbell; Sarah Alaimo; witnesses; interactions (Nov 2021 - present)
<p>Interrogatory No. 30: Describe in detail all communications you had with any legal counsel representing the Swedish Club or any other defendant in this lawsuit regarding Elizabeth Campbell, including the dates, methods of communication, and the substance of each communication. Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 27: Aiding and Abetting, and other relevant COAs as alleged in SAC ¶¶ 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 legal counsel, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 27: Aiding and Abetting; COA 15: Defamation; COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.899–5.925	Sarah Alaimo; legal counsel; Elizabeth Campbell; communications regarding Campbell

<p>RFP No. 1: 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.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 15: Defamation 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 Letter-related documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 15: Defamation; COA 27: Aiding and Abetting	SAC ¶¶ 5.659–5.776; 5.899–5.925	Elizabeth Campbell; Kristine Leander; Sarah Alaimo; Letter (Dec 2024 - present)
<p>RFP No. 2: 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.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 15: Defamation, COAs 39–44: Discrimination and Retaliation, COAs 45–46: Hostile Work Environment as alleged in SAC ¶¶ 5.659–5.776, 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 Leander's communications about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 15: Defamation; COAs 39–44: Discrimination and Retaliation; COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.659–5.776; 5.319–5.479; 5.481–5.502; 5.899–5.925	Elizabeth Campbell; Kristine Leander; Sarah Alaimo; Leander's communications (Aug 2020 - present)
<p>RFP No. 3: 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 discovery relevant to COA 15: Defamation 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 gossip documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 15: Defamation; COA 27: Aiding and Abetting	SAC ¶¶ 5.659–5.776; 5.899–5.925	Elizabeth Campbell; Kristine Leander; other Defendants; gossip (Aug 2020 - present)

<p>RFP No. 4: All documents, reports, or communications held, received, or transmitted by You 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 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-related documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.481–5.502; 5.891–5.898; 5.899–5.925	Elizabeth Campbell; Lars Matthiesen; Sarah Alaimo; Dec 17, 2021, argument
<p>RFP No. 5: 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 present. Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 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 termination documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting	SAC ¶¶ 5.319–5.479; 5.899–5.925	Elizabeth Campbell; Sarah Alaimo; termination documents (Mar 2021 - present)
<p>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 discovery relevant to COAs 39–44: Discrimination and Retaliation 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 membership exclusion documents, 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; 5.659–5.776; 5.899–5.925	Elizabeth Campbell; Kristine Leander; Sarah Alaimo; membership exclusion (Aug 2020 - present)

<p>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 discovery relevant to COAs 39–44: Discrimination and 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 documentation, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting	SAC ¶¶ 5.659–5.776; 5.319–5.479; 5.899–5.925	Elizabeth Campbell; Kristine Leander; Sarah Alaimo; termination schemes (Dec 2021 - present)
<p>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 discovery relevant to COA 15: Defamation, COAs 39–44: Discrimination and Retaliation, 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>	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	Elizabeth Campbell; Defendants; communications (Oct 2020 - present)
<p>RFP No. 9: Produce all documents, including but not limited to emails, memos, notes, and correspondence, related to your employment at the Swedish Club, including your job description, performance reviews, and any disciplinary actions, from November 1, 2021, to the present. Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to employment documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 27: Aiding and Abetting	SAC ¶¶ 5.899–5.925	Sarah Alaimo; Swedish Club; employment documents (Nov 2021 - present)
<p>RFP No. 10: Produce all documents related to your termination from the Swedish Club, including but not limited to termination letters, severance agreements, and communications with legal counsel or the Swedish Club, from the date of your termination to the present. Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.899–5.925; 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>	COA 27: Aiding and Abetting	SAC ¶¶ 5.899–5.925	Sarah Alaimo; Swedish Club; termination documents (Nov 2024 - present)

<p>RFP No. 11: Produce all documents related to any joint defense agreement you are part of with other defendants in this lawsuit, from the date of the original complaint (December 19, 2023) to the present. Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to joint defense agreements, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 27: Aiding and Abetting	SAC ¶¶ 5.899–5.925	Sarah Alaimo; other defendants; joint defense agreement (Dec 2023 - present)
<p>RFP No. 12: Produce all documents, including emails, texts, and notes, of communications between you and Elizabeth Campbell regarding her employment and membership at the Swedish Club, from November 1, 2021, to the present. Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation, 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 communications with Campbell, 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 ¶¶ 5.319–5.479; 5.481–5.502; 5.899–5.925	Elizabeth Campbell
<p>RFP No. 13: Documents related to the decision to terminate Elizabeth Campbell's employment and membership from January 1, 2023, to present; Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation, and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 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 termination decision documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting	SAC ¶¶ 5.319–5.479; 5.899–5.925	Elizabeth Campbell; Sarah Alaimo; Swedish Club Board; termination decision (Jan 2023 - present)
<p>RFP No. 14: Termination letter for Elizabeth Campbell dated March 9, 2023, and related documents from January 1, 2023, to present; Legal Foundation: Same as RFP No. 13</p>	COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting	Same as RFP No. 13	Elizabeth Campbell; Sarah Alaimo; termination letter (Mar 9, 2023); authorization
<p>RFP No. 15: Documents supporting the claim that Elizabeth Campbell was warned after the November 2, 2022, board meeting from November 2, 2022, to present; Legal Foundation: Same as RFP No. 13</p>	COAs 39–44: Discrimination and Retaliation; COA 27: Aiding and Abetting	Same as RFP No. 13	Elizabeth Campbell; Sarah Alaimo; Swedish Club Board; warning claim (Nov 2, 2022)

<p>RFP No. 16: Communications with Shama Albright regarding Elizabeth Campbell from November 1, 2022, 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 communications about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479	Elizabeth Campbell; Sarah Alaimo; Shama Albright; communications (Nov 2022 - present)
<p>RFP No. 17: Communications with Molly Olson Smith regarding Elizabeth Campbell from January 1, 2023, to present; Legal Foundation: CR 26(b)(1) and CR 34 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 communications about Campbell, 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 ¶¶ 5.319–5.479; 5.481–5.502	Elizabeth Campbell; Sarah Alaimo; Molly Olson Smith; communications; administrative leave; March 1, 2023, investigation (Jan 2023 - present)
<p>RFP No. 18: Communications with Kristine Leander regarding Elizabeth Campbell from November 1, 2022, to present; 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 about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</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	Elizabeth Campbell; Sarah Alaimo; Kristine Leander; communications (Nov 2022 - present)
<p>RFP No. 19: Communications with Elizabeth Norgren regarding Elizabeth Campbell from January 1, 2023, 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 communications about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479	Elizabeth Campbell; Sarah Alaimo; Elizabeth Norgren; communications (Jan 2023 - present)
<p>RFP No. 20: Communications with the Swedish Club Board regarding Elizabeth Campbell from November 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 communications with the board about Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479	Elizabeth Campbell; Sarah Alaimo; Swedish Club Board; communications (Nov 2021 - present)

<p>RFP No. 21: Documents related to actions affecting Elizabeth Campbell's emotional well-being from November 1, 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 documents affecting emotional well-being, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.481–5.502	Elizabeth Campbell; Sarah Alaimo; actions affecting emotional well-being (Nov 2021 - present)
<p>RFP No. 22: Documents related to plans or activities involving Elizabeth Campbell's employment or membership from November 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 plans and activities involving Campbell, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479	Elizabeth Campbell; Sarah Alaimo; Swedish Club; plans and activities (Nov 2021 - present)