

D Group 3 - Shama Albright
Discovery Summary

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 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).	COA 15: Defamation	SAC ¶¶ 5.659–5.776; 5.926–5.938	Elizabeth Campbell; Kristine Leander; Shama Albright; 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	Same as above	Same as above
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).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.18–5.52; 5.659–5.776; 5.926–5.938	Elizabeth Campbell; Kristine Leander; Shama Albright; Swedish Club Board; 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; 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; 5.926–5.938	Elizabeth Campbell; Kristine Leander; Shama Albright; 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; 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; 5.891–5.898; 5.926–5.938	Elizabeth Campbell; Lars Matthiesen; Shama Albright; December 17, 2021 argument

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<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 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 actions, 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; 5.659-5.776; 5.926-5.938	Elizabeth Campbell; Kristine Leander; Shama Albright; Employment termination (post-August 2020)
<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>	COAs 39-44: Discrimination and Retaliation	Same as Interrogatory No. 3	Same as Interrogatory No. 3
<p>Interrogatory No. 8: Plans to terminate Plaintiff's employment or membership from August 15, 2020 to present; Legal Foundation: Same as Interrogatory No. 3</p>	COAs 39-44: Discrimination and Retaliation	Same as Interrogatory No. 3	Same as Interrogatory No. 3
<p>Interrogatory No. 9: Decisions for any member's exclusion from June 1, 2019 to present; Legal Foundation: Same as Interrogatory No. 3</p>	COAs 39-44: Discrimination and Retaliation	Same as Interrogatory No. 3	Same as Interrogatory No. 3
<p>Interrogatory No. 10: Individuals with knowledge of Letter events from August 15, 2020 to present; Legal Foundation: Same as Interrogatory No. 1</p>	COA 15: Defamation	Same as Interrogatory No. 1	Same as Interrogatory No. 1
<p>Interrogatory No. 11: Date and reasons for resignation from Swedish Club Board; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39-44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.926-5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation details, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39-44: Discrimination and Retaliation	SAC ¶¶ 5.926-5.938	Shama Albright; Swedish Club Board; Resignation
<p>Interrogatory No. 12: Circumstances leading to resignation; Legal Foundation: Same as Interrogatory No. 11</p>	COAs 39-44: Discrimination and Retaliation	Same as Interrogatory No. 11	Same as Interrogatory No. 11

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Interrogatory No. 13: Board meetings discussing Campbell before resignation; 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 board discussions 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; 5.926–5.938	Elizabeth Campbell; Shama Albright; Swedish Club Board; Board meetings discussing Campbell
Interrogatory No. 14: Concerns raised about club operations before resigning; Legal Foundation: Same as Interrogatory No. 11	COAs 39–44: Discrimination and Retaliation	Same as Interrogatory No. 11	Same as Interrogatory No. 11
Interrogatory No. 15: Current membership status; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 53–54: Public Accommodation as alleged in SAC ¶¶ 5.178–5.194; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to membership status, and any claim of undue burden must be substantiated under CR 26(c).	COAs 53–54: Public Accommodation	SAC ¶¶ 5.178–5.194; 5.926–5.938	Shama Albright; Swedish Club; Membership status
Interrogatory No. 16: Board Election Night Incident on April 20, 2022; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.832–5.864; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to the election incident, and any claim of undue burden must be substantiated under CR 26(c).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.832–5.864; 5.926–5.938	Elizabeth Campbell; Gary Sund; Shama Albright; Swedish Club Board; April 20, 2022 election; denunciation incident
Interrogatory No. 17: Investigation by Perkins Coie; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45–46: Hostile Work Environment 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 investigation details, and any claim of undue burden must be substantiated under CR 26(c).	COAs 45–46: Hostile Work Environment	SAC ¶¶ 5.319–5.479; 5.926–5.938	Elizabeth Campbell; Shama Albright; Perkins Coie; Investigation into employment concerns
Interrogatory No. 18: Hiring of Lane Powell and Sarah Alaimo; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 39–44: Discrimination and Retaliation 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 hiring details, and any claim of undue burden must be substantiated under CR 26(c).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.899–5.925; 5.926–5.938	Shama Albright; Lane Powell; Sarah Alaimo; Hiring process

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Interrogatory No. 19: Transition from Leander to Norgren; Legal Foundation: Same as Interrogatory No. 18	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.865–5.890; 5.926–5.938	Kristine Leander; Elizabeth Norgren; Shama Albright; Executive Director transition
Interrogatory No. 20: Events 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 the March 2023 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; 5.926–5.938	Elizabeth Campbell; Sharon Lucas; Shama Albright; March 1, 2023 board meeting; inappropriate behavior
Interrogatory No. 21: Executive sessions discussing Campbell from April 20, 2022 to December 31, 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 board discussions, and any claim of undue burden must be substantiated under CR 26(c).	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479; 5.926–5.938	Elizabeth Campbell; Shama Albright; Swedish Club Board; Executive sessions discussing Campbell
Interrogatory No. 22: Communications with Campbell regarding her complaints from April 20, 2022 to December 31, 2023; Legal Foundation: Same as Interrogatory No. 21	COAs 39–44: Discrimination and Retaliation	Same as Interrogatory No. 21	Same as Interrogatory No. 21
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).	COA 15: Defamation	SAC ¶¶ 5.659–5.776; 5.926–5.938	Elizabeth Campbell; Kristine Leander; Shama Albright; Letter documents (post-December 2024)
RFP No. 2: Communications by Leander mentioning Plaintiff from August 15, 2020 to present; Legal Foundation: Same as RFP No. 1	COA 15: Defamation	Same as RFP No. 1	Same as RFP No. 1
RFP No. 3: Gossip evidence about Plaintiff from August 15, 2020 to present; Legal Foundation: Same as RFP No. 1	COA 15: Defamation	Same as RFP No. 1	Same as RFP No. 1

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<p>RFP No. 4: Documents related to the public argument between Plaintiff and Lars Matthiesen on December 17, 2021; 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 the December 2021 incident, 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; 5.891–5.898; 5.926–5.938</p>	<p>Elizabeth Campbell; Lars Matthiesen; Shama Albright; December 17, 2021 public argument</p>
<p>RFP No. 5: Documents related to Plaintiff's employment termination; 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>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.319–5.479; 5.659–5.776; 5.926–5.938</p>	<p>Elizabeth Campbell; Kristine Leander; Shama Albright; Swedish Club Board; Employment termination (post-March 2021)</p>
<p>RFP No. 6: Documents related to Plaintiff's membership exclusion; 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>	<p>COAs 39–44: Discrimination and Retaliation</p>	<p>SAC ¶¶ 5.18–5.52; 5.659–5.776; 5.926–5.938</p>	<p>Elizabeth Campbell; Kristine Leander; Shama Albright; Swedish Club Board; Membership exclusion (post-August 2020)</p>
<p>RFP No. 7: Documents evidencing schemes to terminate Plaintiff's employment or membership; 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>	<p>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</p>	<p>Elizabeth Campbell; Kristine Leander; Shama Albright; Termination schemes (post-December 2021)</p>
<p>RFP No. 8: Communications between Defendants discussing Plaintiff, the Letter, or the lawsuit; 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>	<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</p>	<p>Elizabeth Campbell; Defendants; Communications (Oct 2020 - present)</p>

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<p>RFP No. 9: Documents related to Shama Albright's employment at the Swedish Club; Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.926–5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to employment documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.926–5.938	Shama Albright; Swedish Club; Employment documents (Nov 2021 - present)
<p>RFP No. 10: Documents related to Shama Albright's termination from the Swedish Club; Legal Foundation: CR 26(b)(1) and CR 34 permit discovery relevant to COAs 39–44: Discrimination and Retaliation as alleged in SAC ¶¶ 5.926–5.938; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to termination documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.926–5.938	Shama Albright; Swedish Club; Termination documents (from termination date to present)
<p>RFP No. 11: Documents related to joint defense agreements with other defendants; 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	Shama Albright; other defendants; Joint defense agreements (Dec 19, 2023 - present)
<p>RFP No. 12: Documents related to the decision to terminate Elizabeth Campbell's employment and membership; 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>	COAs 39–44: Discrimination and Retaliation	SAC ¶¶ 5.319–5.479; 5.659–5.776; 5.926–5.938	Elizabeth Campbell; Shama Albright; Swedish Club Board; Termination decision (Jan 2023 - present)
<p>RFP No. 13: Documents related to Elizabeth Campbell's termination letter dated March 9, 2023; 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 letter documents, 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; 5.659–5.776; 5.926–5.938	Elizabeth Campbell; Shama Albright; Termination letter (Mar 9, 2023); Related documents (Jan 2023 - present)

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<p>RFP No. 14: Documents supporting the claim that Elizabeth Campbell was warned after the November 2, 2022, board meeting; 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 warning claim documents, 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; 5.659–5.776; 5.926–5.938	Elizabeth Campbell; Shama Albright; Swedish Club Board; Warning claim (Nov 2, 2022 - present)
<p>RFP No. 15: Communications with Shama Albright regarding Elizabeth Campbell; 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; 5.926–5.938	Elizabeth Campbell; Shama Albright; Communications (Nov 2022 - present)
<p>RFP No. 16: Communications with Molly Olson Smith regarding Elizabeth Campbell; 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; 5.926–5.938	Elizabeth Campbell; Molly Olson Smith; Shama Albright; Communications (Jan 2023 - present)
<p>RFP No. 17: Communications with Kristine Leander regarding Elizabeth Campbell; 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; Kristine Leander; Shama Albright; Communications (Nov 2022 - present)
<p>RFP No. 18: Communications with Elizabeth Norgren regarding Elizabeth Campbell; 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; 5.926–5.938	Elizabeth Campbell; Elizabeth Norgren; Shama Albright; Communications (Jan 2023 - present)

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<p>RFP No. 19: Communications with the Swedish Club Board regarding Elizabeth Campbell; 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 communications about Campbell, 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; 5.926–5.938</p>	<p>Elizabeth Campbell; Shama Albright; Swedish Club Board; Communications (Nov 2021 - present)</p>
<p>RFP No. 20: Documents related to actions affecting Elizabeth Campbell's emotional well-being; 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>	<p>COAs 45–46: Hostile Work Environment</p>	<p>SAC ¶¶ 5.481–5.502; 5.926–5.938</p>	<p>Elizabeth Campbell; Shama Albright; Actions affecting emotional well-being (Nov 2021 - present)</p>