

D Group 3 - M Emerson
Discovery Summary

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
Interrogatory No. 1: Identity of the Letter's Author: Do you have any knowledge of the identity of the person or entity who wrote or sent the Letter to Plaintiff? If yes, state the identity and describe how you obtained this knowledge; from July 1, 2024 to the present; Legal Foundation: 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); SAC § V, ¶¶ 5.954–5.960 (Emerson's board role, potentially aware of club communications, pages 452–453)	Campbell; Leander; Letter transmission (post-July 2024)
Interrogatory No. 2: State if you or anyone on your behalf authored, sent, or contributed to drafting or mailing the Letter, including dates, methods, and reasons, from December 1, 2024 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 50: Defamation as alleged in SAC ¶¶ 5.659–5.776; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to Emerson'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); SAC § V, ¶¶ 5.954–5.960 (Emerson's board activities, potentially overseeing communications, pages 452–453)	Campbell; Leander; Emerson; Letter drafting/sending (post-December 2024)
Interrogatory No. 3: Describe actions, statements, or plans by Leander, you, or others related to Plaintiff's membership termination and exclusion from the Swedish Club, including dates, reasons, and notices, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COAs 8–12: Discrimination as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board role in club decisions, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's retaliatory actions, including 5.775, pages 332–366); SAC ¶¶ 5.18–5.52 (membership termination practices, pages 7–13)	Campbell; Leander; Emerson; Membership termination (post-August 2020)
Interrogatory No. 4: Identify instances where Leander, you, or others discussed Plaintiff with club members or staff, including dates, locations, participants, and content, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 50: Defamation as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board role, potentially aware of discussions, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's alleged gossip and defamatory statements, including 5.775, pages 332–366)	Campbell; Leander; Emerson; club members; Gossip at Swedish Club (post-August 2020)

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<p>Interrogatory No. 5: State knowledge of the public argument between Plaintiff and Matthiesen on December 17, 2021, including date, location, witnesses, and Leander's role, from January 1, 2021 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 43–44: Hostile Environment as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board role during hostile incidents, pages 452–453); SAC ¶¶ 5.891–5.898 (Matthiesen's public argument with Campbell, pages 434–436); SAC ¶¶ 5.659–5.776 (Leander's influence, pages 332–366)</p>	<p>Campbell; Matthiesen; Leander; December 17, 2021 public argument</p>
<p>Interrogatory No. 6: Describe actions by Leander, you, or others contributing to Plaintiff's employment termination, including persons, dates, reasons, and communications, from August 1, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 45–47: Wrongful Termination and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board oversight, pages 452–453); SAC ¶¶ 5.174–5.177 (employment termination practices, pages 91–92); SAC ¶¶ 5.659–5.776 (Leander's role, pages 332–366); SAC ¶¶ 5.899–5.925 (Alaimo's oversight, pages 437–446)</p>	<p>Campbell; Leander; Emerson; Alaimo; Employment termination (post-August 2020)</p>
<p>Interrogatory No. 7: Identify decisions, policies, or actions by Leander, you, or others leading to Plaintiff's membership termination and exclusion, including dates, reasons, and notices, from September 1, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COAs 8–12: Discrimination as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board role in club governance, pages 452–453); SAC ¶¶ 5.18–5.52 (membership exclusion policies, pages 7–13); SAC ¶¶ 5.659–5.776 (Leander's retaliatory actions, including 5.775, pages 332–366)</p>	<p>Campbell; Leander; Emerson; Membership exclusion (post-September 2020)</p>
<p>Interrogatory No. 8: Identify decisions, policies, or actions by Leander, you, or others leading to any member's membership termination and exclusion, including dates, reasons, and notices, from June 1, 2019 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 8–12: Discrimination as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board governance of club policies, pages 452–453); SAC ¶¶ 5.18–5.52 (membership termination practices, pages 7–13); SAC ¶¶ 5.659–5.776 (Leander's discriminatory policies, pages 332–366)</p>	<p>Campbell; Leander; Emerson; other members; Member exclusions (post-June 2019)</p>

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<p>Interrogatory No. 9: Describe plans, agreements, or efforts by you or others to terminate Plaintiff's employment or membership, including participants, timelines, and objectives, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board role, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's scheme to terminate Campbell, including 5.775, pages 332–366); SAC ¶¶ 5.319–5.479 (Campbell's advocacy, pages 194–242); SAC ¶¶ 5.899–5.925 (Alaimo's role, pages 437–446)</p>	<p>Campbell; Leander; Emerson; Alaimo; Termination scheme (post-August 2020)</p>
<p>Interrogatory No. 10: Identify individuals with knowledge of events or statements in the Letter, including Leander's actions toward Plaintiff, from August 15, 2020 to present; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 50: Defamation and COA 56: Retaliation as alleged in SAC ¶¶ 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 ¶¶ 5.954–5.960 (Emerson's board knowledge, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's 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>Interrogatory No. 11: State the date you resigned from the Swedish Club Board of Directors and provide a detailed explanation of all reasons for your resignation; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to the case as alleged in SAC Section V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation details, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>56: Retaliation, 45–47: Wrongful Termination</p>	<p>SAC Section V, regarding board member resignations and Alaimo's firing (e.g., ¶¶ 5.899–5.925)</p>	<p>Mary Emerson; Sarah Alaimo; Resignation date</p>
<p>Interrogatory No. 12: Did you discuss Elizabeth Campbell's lawsuit, membership status, employment termination, or alleged mistreatment with other board members during your tenure? If so, provide details, including dates and participants; Legal Foundation: 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>56: Retaliation, 45–47: Wrongful Termination</p>	<p>SAC ¶¶ 5.954–5.960 (Emerson's board discussions, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242)</p>	<p>Campbell; Emerson; board members; Lawsuit discussions during tenure</p>

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<p>Interrogatory No. 13: Describe any events, actions, or communications involving Kristine Leander, Elizabeth Norgren, or other board members that contributed to your decision to resign, including specific dates and details; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to Emerson's resignation context as alleged in SAC Section V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to pre-resignation interactions, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's resignation context, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's influence, pages 332–366); SAC ¶¶ 5.865–5.890 (Norgren's role, pages 426–432)	Emerson; Leander; Norgren; board members; Pre-resignation interactions
<p>Interrogatory No. 14: Did you raise concerns or express dissatisfaction with the Swedish Club's operations management, personnel decisions, cultural programming, financial transparency, financial management or decisions, board governance to any individual prior to resigning? If so, identify the recipients and summarize the discussions; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to governance issues 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 concerns raised, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's board activities, pages 452–453); SAC ¶¶ 5.195–5.318 (club financial and operational issues, pages 104–189)	Emerson; board members; Governance concerns (pre-resignation)
<p>Interrogatory No. 15: Describe your duties as the Swedish Club Board Secretary during your tenure; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to Emerson's role as alleged in SAC Section V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to secretarial duties, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's secretarial role, pages 452–453); SAC ¶¶ 5.195–5.318 (board operations, pages 104–189)	Emerson; Secretarial duties during tenure
<p>Interrogatory No. 16: Identify all board meetings you attended from January 1, 2020 to your resignation, and for each meeting, state whether minutes were kept and by whom; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to board activities 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 meeting attendance and minute-keeping, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's attendance and minute-keeping, pages 452–453); SAC ¶¶ 5.195–5.318 (board meetings, pages 104–189)	Emerson; board members; Board meetings (2020-resignation)
<p>Interrogatory No. 17: For each board meeting where Plaintiff's membership or employment was discussed, provide the date, participants, and a summary of the discussion; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 discussions about Plaintiff, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's recording of discussions, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); SAC ¶¶ 5.18–5.52 (membership issues, pages 7–13); SAC ¶¶ 5.174–5.177 (employment issues, pages 91–92)	Campbell; board members; Board meetings discussing Plaintiff

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<p>Interrogatory No. 18: Summarize any board discussions you recorded as secretary about Plaintiff's termination or exclusion, including dates and key points; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 recorded discussions, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's minute-keeping, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); SAC ¶¶ 5.18–5.52 (membership issues, pages 7–13); SAC ¶¶ 5.174–5.177 (employment issues, pages 91–92)	Campbell; board members; Discussions about termination or exclusion
<p>Interrogatory No. 19: Identify all board votes you recorded related to Plaintiff's membership or employment, including dates and outcomes; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 votes, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's vote recording, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); SAC ¶¶ 5.18–5.52 (membership issues, pages 7–13); SAC ¶¶ 5.174–5.177 (employment issues, pages 91–92)	Campbell; board members; Board votes on Plaintiff
<p>Interrogatory No. 20: Describe your role in recording board votes concerning Plaintiff's membership or employment; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 vote recording, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's role in vote recording, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); SAC ¶¶ 5.18–5.52 (membership issues, pages 7–13); SAC ¶¶ 5.174–5.177 (employment issues, pages 91–92)	Emerson; board members; Vote recording for Plaintiff
<p>Interrogatory No. 21: Were there any instances where you altered or edited board meeting minutes after they were approved? If yes, describe each instance, including the date, reason, and any communications related to the changes; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to board activities as alleged in SAC Section V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to minute alterations, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's minute-keeping, pages 452–453); SAC ¶¶ 5.195–5.318 (board operations, pages 104–189)	Emerson; board members; Minute alterations
<p>Interrogatory No. 22: Describe any communications you had regarding changing board meeting minutes related to Elizabeth Campbell, including dates, participants, and reasons for changes; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 minute changes, and any claim of undue burden must be substantiated under CR 26(c).</p>	56: Retaliation, 45–47: Wrongful Termination	SAC ¶¶ 5.954–5.960 (Emerson's minute-keeping, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); SAC ¶¶ 5.195–5.318 (board operations, pages 104–189)	Campbell; Emerson; board members; Minute changes related to Plaintiff

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<p>Interrogatory No. 23: Identify all emails or other written communications sent or received by you as board secretary regarding Elizabeth Campbell from January 1, 2022, to the present, including date, recipient, and content; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 secretary communications, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>56: Retaliation, 45–47: Wrongful Termination</p>	<p>SAC ¶¶ 5.954–5.960 (Emerson’s secretary role, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.195–5.318 (board operations, pages 104–189)</p>	<p>Campbell; Emerson; board members; Secretary emails (2022-present)</p>
<p>Interrogatory No. 24: Describe all interactions you have had with Elizabeth Campbell from January 1, 2022, to the present, including meetings, conversations, emails, or other communications, providing date, location, participants, and a summary of what was discussed or occurred; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 56: Retaliation, 45–47: Wrongful Termination 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 interactions with Plaintiff, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>56: Retaliation, 45–47: Wrongful Termination</p>	<p>SAC ¶¶ 5.954–5.960 (Emerson’s interactions, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.195–5.318 (board operations, pages 104–189)</p>	<p>Campbell; Emerson; Interactions (2022-present)</p>
<p>Interrogatory No. 25: Describe all communications you had with Kristine Leander regarding Elizabeth Campbell from January 1, 2022, to the present, including date, method, participants, and content; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COAs 50: Defamation, 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 communications with Leander, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>50: Defamation, 56: Retaliation</p>	<p>SAC ¶¶ 5.954–5.960 (Emerson’s communications, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander’s actions, pages 332–366); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242)</p>	<p>Campbell; Leander; Emerson; Communications (2022-present)</p>
<p>Interrogatory No. 26: Were you aware of any plan, agreement, or scheme by Kristine Leander or other Defendants to terminate Elizabeth Campbell’s employment or membership? If yes, describe your knowledge, including dates, participants, and communications; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to COA 56: Retaliation and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 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 schemes against Plaintiff, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>56: Retaliation, 27: Aiding and Abetting</p>	<p>SAC ¶¶ 5.954–5.960 (Emerson’s awareness, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander’s schemes, pages 332–366); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.899–5.925 (Alaimo’s role, pages 437–446)</p>	<p>Campbell; Leander; Emerson; Alaimo; Schemes against Plaintiff</p>

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<p>Interrogatory No. 27: Describe your participation in any decisions regarding Sarah Alaimo's employment, including her hiring, performance reviews, disciplinary actions, or termination, from January 1, 2022, to the 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 Alaimo's employment decisions, and any claim of undue burden must be substantiated under CR 26(c).</p>	27: Aiding and Abetting	SAC ¶¶ 5.954–5.960 (Emerson's board role, pages 452–453); SAC ¶¶ 5.899–5.925 (Alaimo's employment, pages 437–446)	Emerson; Sarah Alaimo; Employment decisions (2022-present)
<p>Interrogatory No. 28: Explain how Sarah Alaimo's firing in November 2024 influenced your decision to resign, including any communications or events related to this influence; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to the case as alleged in SAC Section V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation influence, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	SAC ¶¶ 5.954–5.960 (Emerson's resignation context, pages 452–453); SAC ¶¶ 5.899–5.925 (Alaimo's firing, pages 437–446)	Emerson; Sarah Alaimo; Resignation influenced by firing
<p>Interrogatory No. 29: Provide any additional information relevant to your role as board secretary and this lawsuit, including any documents, communications, or events not covered in prior interrogatories; Legal Foundation: CR 26(b)(1) and CR 33 permit discovery relevant to the case as alleged in SAC Section V; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to additional relevant information, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	SAC ¶¶ 5.954–5.960 (Emerson's secretarial role, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell's claims, pages 194–242); SAC ¶¶ 5.195–5.318 (board operations, pages 104–189)	Emerson; Campbell; Additional information
<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; Legal Foundation: 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 defamatory statements, pages 332–366); SAC ¶¶ 5.954–5.960 (Emerson's board role, potentially overseeing correspondence, pages 452–453)	Kristine Leander; Elizabeth Campbell; Letter creation (post-December 2024)

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<p>RFP No. 2: All documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander that mention the Plaintiff, their employment, or membership at the Swedish Club, from August 15, 2020, to the present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56: Retaliation and COA 50: Defamation as alleged in SAC ¶¶ 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>	<p>56: Retaliation, 50: Defamation</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s communications targeting Campbell, pages 332–366); SAC ¶¶ 5.954–5.960 (Emerson’s board role, potentially aware, pages 452–453)</p>	<p>Kristine Leander; Elizabeth Campbell; Communications (post-August 2020)</p>
<p>RFP No. 3: All documents reflecting statements or gossip about the 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 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>	<p>50: Defamation</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s gossip and defamatory statements, pages 332–366); SAC ¶¶ 5.954–5.960 (Emerson’s board role, potentially aware, pages 452–453)</p>	<p>Kristine Leander; Elizabeth Campbell; club members; Gossip (post-August 2020)</p>
<p>RFP No. 4: All documents, reports, or communications related to the "clamorous and public argument" between the Plaintiff and Lars Matthiesen at the Swedish Club on 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 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>	<p>43–44: Hostile Environment</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen’s argument with Campbell, pages 434–436); SAC ¶¶ 5.954–5.960 (Emerson’s board role during incident, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander’s influence, pages 332–366)</p>	<p>Elizabeth Campbell; Lars Matthiesen; December 17, 2021 public argument</p>

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<p>RFP No. 5: All documents related to the Plaintiff's termination from employment at the Swedish Club, including personnel files, performance reviews, disciplinary records, emails, and meeting notes involving Kristine Leander or other Defendants, from March 1, 2021, to the present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COAs 45–47: Wrongful Termination and COA 27: Aiding and Abetting as alleged in SAC ¶¶ 5.174–5.177, 5.899–5.925; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to termination records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>45–47: Wrongful Termination, 27: Aiding and Abetting</p>	<p>SAC ¶¶ 5.174–5.177 (employment termination, pages 91–92); SAC ¶¶ 5.954–5.960 (Emerson's board oversight, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's role, pages 332–366); SAC ¶¶ 5.899–5.925 (Alaimo's oversight, pages 437–446)</p>	<p>Elizabeth Campbell; Kristine Leander; Mary Emerson; Employment termination (post-March 2021)</p>
<p>RFP No. 6: All documents related to the Plaintiff's exclusion from the Swedish Club as a member, including membership records, board minutes, emails, or notices, particularly those involving Kristine Leander or other Defendants, from August 15, 2020, to the present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56: Retaliation and COAs 8–12: Discrimination as alleged in SAC ¶¶ 5.18–5.52, 5.659–5.776; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to exclusion records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>56: Retaliation, 8–12: Discrimination</p>	<p>SAC ¶¶ 5.18–5.52 (membership exclusion, pages 7–13); SAC ¶¶ 5.954–5.960 (Emerson's board role, pages 452–453); SAC ¶¶ 5.659–5.776 (Leander's role, including 5.775, pages 332–366)</p>	<p>Elizabeth Campbell; Kristine Leander; Mary Emerson; Membership exclusion (post-August 2020)</p>
<p>RFP No. 7: 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 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>COA 56: Retaliation; COA 27: Aiding and Abetting</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's scheme, pages 332–366); SAC ¶¶ 5.319–5.479 (Campbell's advocacy, pages 194–242); SAC ¶¶ 5.899–5.925 (Alaimo's role, pages 437–446)</p>	<p>Campbell; Leander; Alaimo; Defendants; Termination scheme (post-December 2021)</p>

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<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 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>	N/A	<p>SAC ¶¶ 5.954–5.960 (Emerson’s board discussions, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell’s lawsuit claims, pages 194–242); SAC ¶¶ 5.659–5.776 (Letter context, pages 332–366)</p>	<p>Campbell; Emerson; Group 3 Defendants; Lawsuit discussions (post-October 2020)</p>
<p>RFP No. 9: All emails, text messages, or other written communications sent or received by you between January 1, 2021, and the present relating to your resignation from the Swedish Club Board of Directors; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.954–5.960; 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>	N/A	<p>SAC ¶¶ 5.954–5.960 (Emerson’s resignation context, pages 452–453); SAC ¶¶ 5.195–5.318 (club governance issues, pages 104–189); SAC ¶¶ 5.899–5.925 (Alaimo’s firing, pages 437–446)</p>	<p>Emerson; Alaimo; board members; Resignation communications (2021-present)</p>
<p>RFP No. 10: A copy of your resignation letter or any written notice of resignation submitted to the Swedish Club, including any drafts thereof; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.954–5.960; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation documents, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.954–5.960 (Emerson’s resignation, pages 452–453); SAC ¶¶ 5.195–5.318 (club governance, pages 104–189); SAC ¶¶ 5.899–5.925 (Alaimo’s firing, pages 437–446)</p>	<p>Emerson; Alaimo; Resignation letter</p>
<p>RFP No. 11: All responses you received from board members, Swedish Club staff, or members regarding your resignation, whether in writing or electronic form; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.954–5.960; 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 ¶¶ 5.954–5.960 (Emerson’s resignation context, pages 452–453); SAC ¶¶ 5.195–5.318 (club governance, pages 104–189); SAC ¶¶ 5.899–5.925 (Alaimo’s firing, pages 437–446)</p>	<p>Emerson; board members; staff; members; Responses to resignation</p>

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<p>RFP No. 12: All communications between you and other board members from January 1, 2021, to the present discussing your resignation or the resignations of other board members; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.954–5.960; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to resignation discussions, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.954–5.960 (Emerson’s resignation context, pages 452–453); SAC ¶¶ 5.195–5.318 (club governance, pages 104–189); SAC ¶¶ 5.899–5.925 (Alaimo’s firing, pages 437–446)</p>	<p>Emerson; other board members; Resignation discussions (2021-present)</p>
<p>RFP No. 13: Any documents, notes, or emails in your possession reflecting concerns about the Swedish Club’s management, finances, or treatment of members/employees prior to your resignation; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.195–5.318; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to concerns about club management, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.954–5.960 (Emerson’s board activities, pages 452–453); SAC ¶¶ 5.195–5.318 (club financial and operational issues, pages 104–189)</p>	<p>Emerson; board members; Concerns about club management (pre-resignation)</p>
<p>RFP No. 14: All minutes, agendas, audio recordings, video recordings, transcripts, notes, drafts of minutes, and any other records from all Swedish Club board meetings, including regular meetings, executive sessions, and Zoom meetings, from September 1, 2021, to the present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to the case as alleged in SAC ¶¶ 5.195–5.318; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to board meeting records, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.954–5.960 (Emerson’s attendance and minute-keeping, pages 452–453); SAC ¶¶ 5.195–5.318 (board meetings, pages 104–189)</p>	<p>Emerson; board members; Board meetings (post-September 2021)</p>
<p>RFP No. 15: All communications (including emails, texts, letters, notes) in which you participated that mention or relate to Elizabeth Campbell from September 1, 2022, to the present; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 56: Retaliation and COA 45–47: Wrongful Termination 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>	COA 56: Retaliation; COA 45–47: Wrongful Termination	<p>SAC ¶¶ 5.954–5.960 (Emerson’s communications, pages 452–453); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.174–5.177 (employment issues, pages 91–92)</p>	<p>Campbell; Emerson; board members; Communications about Campbell (post-September 2022)</p>

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<p>RFP No. 16: Documents related to Swedish Club bylaw amendments proposed and voted on in April 2022, including drafts, emails, and vote records; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to club governance 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 bylaw amendments, and any claim of undue burden must be substantiated under CR 26(c).</p>	N/A	<p>SAC ¶¶ 5.195–5.318 (club governance, pages 104–189); SAC ¶¶ 5.954–5.960 (Emerson’s board role, pages 452–453)</p>	<p>Emerson; board members; Bylaw amendments (April 2022)</p>
<p>RFP No. 17: Documents concerning any investigation of Elizabeth Campbell, her administrative leave, and termination of employment and membership, including reports, witness statements, emails, and meeting notes; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 45–47: Wrongful Termination as alleged in SAC ¶¶ 5.174–5.177; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to investigation and termination records, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 45–47: Wrongful Termination	<p>SAC ¶¶ 5.174–5.177 (employment termination, pages 91–92); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.954–5.960 (Emerson’s board role, pages 452–453)</p>	<p>Campbell; Emerson; board members; Investigation and termination</p>
<p>RFP No. 18: Personal notes, diaries, journals, or records mentioning Elizabeth Campbell or events leading to her termination; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 45–47: Wrongful Termination as alleged in SAC ¶¶ 5.174–5.177; If privilege is asserted, a privilege log is required under CR 26(b)(5); The request is tailored to personal records, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 45–47: Wrongful Termination	<p>SAC ¶¶ 5.174–5.177 (employment termination, pages 91–92); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.954–5.960 (Emerson’s role, pages 452–453)</p>	<p>Campbell; Emerson; Personal records mentioning Campbell</p>
<p>RFP No. 19: Documents related to harassment or discrimination complaints or investigations at the Swedish Club from January 1, 2022, to present, including those involving Elizabeth Campbell; Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to COA 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 harassment and discrimination records, and any claim of undue burden must be substantiated under CR 26(c).</p>	COA 43–44: Hostile Environment	<p>SAC ¶¶ 5.891–5.898 (harassment incidents, pages 434–436); SAC ¶¶ 5.319–5.479 (Campbell’s claims, pages 194–242); SAC ¶¶ 5.954–5.960 (Emerson’s role, pages 452–453)</p>	<p>Campbell; Emerson; club members; Harassment complaints (2022–present)</p>

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<p>RFP No. 20: Records from Swedish Club committee meetings (building & property, governance and bylaws, finance) from January 1, 2022, to present, including minutes, agendas, recordings, notes, drafts, and records related to personnel, employment, membership, bylaws, or issues impacting Campbell's employment or membership;</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit production of documents relevant to club operations 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 committee records, and any claim of undue burden must be substantiated under CR 26(c).</p>	<p>56: Retaliation, 45–47: Wrongful Termination</p>	<p>SAC ¶¶ 5.195–5.318 (club operations, pages 104–189); SAC ¶¶ 5.954–5.960 (Emerson's role, pages 452–453)</p>	<p>Emerson; board members; Committee meetings (2022–present)</p>
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