

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Identify the Letter's author and knowledge source, July 1, 2024–present. Legal Foundation: CR 26(b)(1) permits broad discovery of information reasonably calculated to lead to admissible evidence. CR 33 requires complete, sworn answers. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), probing Matthiesen's knowledge of defamatory statements.</p>	8: Defamation	¶¶ 5.602–5.658 (defamatory statements)	Lars Matthiesen, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)
<p>Interrogatory No. 2: Describe Kristine Leander's or others' actions, statements, or plans to terminate Plaintiff's Swedish Club membership or exclude her, August 15, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of membership interference facts. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Cause 9 (Tortious Interference with Contract-Membership, page 372) and Cause 53 (Public Accommodation, RCW</p>	9: Tortious Interference with Contract-Membership, 53: Public Accommodation (RCW 49.60.215)	¶¶ 5.602–5.658 (membership exclusion)	Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting

<p>Interrogatory No. 3: Identify instances of discussions about Plaintiff by Leander, Matthiesen, or others, August 15, 2020–present.</p> <p>Legal Foundation: CR 26(b)(1) supports discovery of defamatory discussions. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372) and Cause 12 (NIED, page 372), alleging gossip.</p>	8: Defamation, 12: Tort of Outrage (NIED)	¶¶ 5.602–5.658 (gossip allegations)	Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Sarah Alaimo; August 2020–2023 (club discussions)
<p>Interrogatory No. 4: State knowledge of the December 17, 2021 argument at the Swedish Club, including date, location, witnesses, and roles, January 1, 2021–present.</p> <p>Legal Foundation: CR 26(b)(1) permits discovery of incident details. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Cause 11 (IIED, page 372) and Cause 8 (Defamation, page 372), alleging distress.</p>	8: Defamation, 11: Tort of Outrage (IIED)	¶¶ 5.602–5.658 (December 17, 2021 argument)	Lars Matthiesen, Elizabeth Campbell, Kristine Leander; December 17, 2021 argument
<p>Interrogatory No. 5: Describe actions by Leander, Matthiesen, or others contributing to Plaintiff’s employment termination, August 1, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of termination facts. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 10 (Tortious Interference with Employment Expectancy, page 372) and Cause 45 (Hostile Work Environment, Title VII, page 378), alleging termination.</p>	10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)	¶¶ 5.602–5.658 (termination, hostile environment)	Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Sarah Alaimo; January 18, 2022 staff meeting

<p>Interrogatory No. 6: Identify decisions or actions leading to Plaintiff's membership exclusion, September 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of exclusion facts. CR 33 mandates detailed responses. Relevant to SAC Appendix A, Cause 9 (Tortious Interference with Contract-Membership, page 372) and Cause 53 (Public Accommodation, RCW 49.60.215, page 381), alleging exclusion.</p>	<p>9: Tortious Interference with Contract-Membership, 53: Public Accommodation (RCW 49.60.215)</p>	<p>¶¶ 5.602–5.658 (membership exclusion)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Gary Sund; November 2, 2022 board meeting</p>
<p>Interrogatory No. 7: Describe plans or efforts to terminate Plaintiff's employment or membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of coordinated efforts. CR 33 requires detailed answers. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (coordinated interference)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Sarah Alaimo; August 2020–2023 (scheme allegations)</p>
<p>Interrogatory No. 8: Describe your relationship with Elizabeth Campbell outside Swedish Club activities, July 1985–present. Legal Foundation: CR 26(b)(1) allows discovery of relationship context. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Cause 11 (IIED, page 372) and Cause 12 (NIED, page 372), alleging distress from relationship interference (FAC ¶¶ 5.17–5.20).</p>	<p>11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED)</p>	<p>¶¶ 5.602–5.658 (relationship distress); FAC ¶¶ 5.17–5.20</p>	<p>Lars Matthiesen, Elizabeth Campbell; 1985–2023 (personal interactions)</p>

<p>Interrogatory No. 9: Did you discuss Campbell's employment, termination, or membership with Kristine Leander? Provide details, January 1, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of interference discussions. CR 33 requires specificity. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (interference discussions)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (discussions)</p>
<p>Interrogatory No. 10: Summarize statements to Leander about Campbell's character, job, membership, or personal life, January 1, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of defamatory statements. CR 33 requires detailed answers. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	<p>8: Defamation</p>	<p>¶¶ 5.602–5.658 (defamatory statements)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (statement discussions)</p>
<p>Interrogatory No. 11: Did you participate in activities with Leander to destabilize your relationship with Campbell, as alleged in FAC ¶ 1.17? Describe details, January 1, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of relationship interference. CR 33 mandates specificity. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress.</p>	<p>11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (relationship interference); FAC ¶ 1.17</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (relationship activities)</p>

<p>Interrogatory No. 12: Describe your relationship with Campbell, including communications, 1985–present. Legal Foundation: CR 26(b)(1) supports discovery of relationship context. CR 33 requires detailed answers. Relevant to SAC Appendix A, Cause 11 (IIED, page 372) and Cause 12 (NIED, page 372), alleging distress (FAC ¶¶ 5.17–5.20).</p>	<p>11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED)</p>	<p>¶¶ 5.602–5.658 (relationship distress); FAC ¶¶ 5.17–5.20</p>	<p>Lars Matthiesen, Elizabeth Campbell; 1985–2023 (communications)</p>
<p>Interrogatory No. 13: Describe representations to Campbell about your marital status with Yara Silva, including intent to divorce, 1990–present (FAC ¶¶ 5.17–5.20). Legal Foundation: CR 26(b)(1) permits discovery of misrepresentation facts. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from false promises.</p>	<p>11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (marital misrepresentations); FAC ¶¶ 5.17–5.20</p>	<p>Lars Matthiesen, Elizabeth Campbell, Yara Silva; 1990–2023 (marital discussions)</p>
<p>Interrogatory No. 14: Identify financial support or gifts to Campbell, e.g., 2019 dental work (FAC ¶ 5.33), 1990–present. Legal Foundation: CR 26(b)(1) allows discovery of financial transactions. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging reliance causing distress.</p>	<p>11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (financial support); FAC ¶ 5.33</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2019 (dental work)</p>

<p>Interrogatory No. 15: Describe statements to third parties about Campbell, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of defamatory statements. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	8: Defamation	<p>¶¶ 5.602–5.658 (third-party statements)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Swedish Club members; 2020–2023 (statements)</p>
<p>Interrogatory No. 16: Identify actions impacting Campbell’s membership or employment, 2020–2023. Legal Foundation: CR 26(b)(1) permits discovery of interference actions. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (interference actions)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Judy Cooper; 2020–2023 (club actions)</p>
<p>Interrogatory No. 17: Describe your role in Highland Holdings, Inc., including plans to sell, 2015–present (FAC ¶¶ 5.28–5.32). Legal Foundation: CR 26(b)(1) allows discovery of business dealings. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from misrepresentations.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (business misrepresentations); FAC ¶¶ 5.28–5.32</p>	<p>Lars Matthiesen, Elizabeth Campbell, Patrick Fossey; 2015–2023 (Highland dealings)</p>

<p>Interrogatory No. 18: Identify discussions about Campbell's personal life or reputation with third parties, 2020–present (Exhibit P-7). Legal Foundation: CR 26(b)(1) supports discovery of defamatory discussions. CR 33 requires detailed answers. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	8: Defamation	<p>¶¶ 5.602–5.658 (third-party discussions); Exhibit P-7</p>	<p>Lars Matthiesen, Elizabeth Campbell, Diane, Sandy; 2020–2023 (discussions)</p>
<p>Interrogatory No. 19: Describe visits to Campbell's home or her visits to Highland office, 2019–2021 (FAC ¶¶ 5.9, 5.27). Legal Foundation: CR 26(b)(1) permits discovery of relationship interactions. CR 33 mandates specificity. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (visits, distress); FAC ¶¶ 5.9, 5.27</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2019–2021 (home/office visits)</p>
<p>Interrogatory No. 20: Identify financial transactions with Yara Silva discussed with Campbell, 2015–present (FAC ¶ 5.43). Legal Foundation: CR 26(b)(1) allows discovery of financial discussions. CR 33 requires detailed answers. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from misrepresentations.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (financial discussions); FAC ¶ 5.43</p>	<p>Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2015–2023 (financial transactions)</p>

<p>Interrogatory No. 21: State whether you suggested Campbell was emotionally unstable or unfit, 2020–present. Legal Foundation: CR 26(b)(1) supports discovery of defamatory statements. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	8: Defamation	<p>¶¶ 5.602–5.658 (character statements)</p>	Lars Matthiesen, Elizabeth Campbell; 2020–2023 (character statements)
<p>Interrogatory No. 22: Describe altercations with Yara Silva disclosed to Campbell, 2015–present (FAC ¶¶ 4.23–4.24). Legal Foundation: CR 26(b)(1) permits discovery of relationship disclosures. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from disclosures.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (altercation disclosures); FAC ¶¶ 4.23–4.24</p>	Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2015–2023 (altercations)
<p>Interrogatory No. 23: Identify persons with knowledge of FAC allegations or defenses. Legal Foundation: CR 26(b)(1) allows discovery of witness identities. CR 33 requires complete answers. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), supporting claims and defenses.</p>	8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)	<p>¶¶ 5.602–5.658 (witness knowledge)</p>	Lars Matthiesen, Elizabeth Campbell, Kristine Leander, Gary Sund; 2020–2023 (club events)

<p>Interrogatory No. 24: Specify facts, documents, and witnesses supporting denial of FAC ¶¶ 3.8, 4.8 (except admitted residency, marriage), 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of denial basis. CR 33 requires specificity. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), probing denial context.</p>	<p>8: Defamation</p>	<p>¶¶ 5.602–5.658 (denial context); FAC ¶¶ 3.8, 4.8</p>	<p>Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2020–2023 (denial-related events)</p>
<p>Interrogatory No. 25: Specify facts, documents, and witnesses supporting Defense 2 (no proximate causation), 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of defense basis. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing causation defense.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (causation defense)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>
<p>Interrogatory No. 26: Specify causes of action failing to state a claim (Defense 1), including elements, authorities, facts, documents, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of defense basis. CR 33 requires specificity. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing claim validity.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (claim validity)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>

<p>Interrogatory No. 27: Specify actions by Plaintiff or third parties causing damages (Defense 3), including dates, contributions, facts, documents, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of defense basis. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing third-party causation.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (third-party causation)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>
<p>Interrogatory No. 28: Identify speculative or uncertain aspects of Plaintiff’s damages (Defense 4), including evidence, legal standards, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of damage defenses. CR 33 requires specificity. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing damage validity.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (damage validity)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (damage-related events)</p>
<p>Interrogatory No. 29: Specify facts, actions Plaintiff should have taken, and evidence for failure to mitigate damages (Defense 5), 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of mitigation defenses. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing mitigation.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (mitigation defense)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (mitigation-related events)</p>

<p>Interrogatory No. 30: Specify actions by others causing damages (Defense 6), including dates, contributions, facts, documents, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of third-party causation. CR 33 requires specificity. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing causation defense.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (third-party causation)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>
<p>Interrogatory No. 31: Specify intervening actions causing damages (Defense 7), including dates, contributions, facts, documents, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of causation defenses. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing causation.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (intervening causation)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>
<p>Interrogatory No. 32: Specify actions supporting equitable defenses (Defenses 8, 10), including dates, contributions, facts, documents, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) permits discovery of equitable defenses. CR 33 requires specificity. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing laches.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (equitable defenses)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>

<p>Interrogatory No. 33: Specify time-barred causes of action (Defense 9), including statutes, accrual dates, facts, documents, and witnesses, 2020–present. Legal Foundation: CR 26(b)(1) allows discovery of statute of limitations defenses. CR 33 mandates detailed answers. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378), probing timeliness.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (time-barred claims)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense-related events)</p>
<p>RFP No. 1: Produce documents related to the Letter’s creation, December 1, 2024–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of relevant documents. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), probing Letter’s origin.</p>	<p>8: Defamation</p>	<p>¶¶ 5.602–5.658 (Letter creation)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; December 2024 (Letter creation)</p>
<p>RFP No. 2: Produce documents by Leander mentioning Plaintiff’s employment or membership, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of interference documents. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (Leander documents)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; August 2020–2023 (communications)</p>

<p>RFP No. 3: Produce documents reflecting gossip about Plaintiff, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defamatory documents. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372) and Cause 12 (NIED, page 372), alleging gossip.</p>	<p>8: Defamation, 12: Tort of Outrage (NIED)</p>	<p>¶¶ 5.602–5.658 (gossip documents)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Gary Sund; August 2020–2023 (gossip records)</p>
<p>RFP No. 4: Produce documents related to the December 17, 2021 argument, December 17, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of incident documents. Relevant to SAC Appendix A, Cause 11 (IIED, page 372) and Cause 8 (Defamation, page 372), alleging distress.</p>	<p>8: Defamation, 11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (argument records)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; December 17, 2021 argument</p>
<p>RFP No. 5: Produce documents related to Plaintiff’s employment termination, March 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of termination documents. Relevant to SAC Appendix A, Cause 10 (Tortious Interference with Employment Expectancy, page 372) and Cause 45 (Hostile Work Environment, Title VII, page 378), alleging termination.</p>	<p>10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (termination records)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander, Sarah Alaimo; March 2021–2023 (termination records)</p>

<p>RFP No. 6: Produce documents related to Plaintiff's membership exclusion, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of exclusion documents. Relevant to SAC Appendix A, Cause 9 (Tortious Interference with Contract-Membership, page 372) and Cause 53 (Public Accommodation, RCW 49.60.215, page 381), alleging exclusion.</p>	<p>9: Tortious Interference with Contract-Membership, 53: Public Accommodation (RCW 49.60.215)</p>	<p>¶¶ 5.602–5.658 (exclusion records)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander, Gary Sund; August 2020–2023 (exclusion records)</p>
<p>RFP No. 7: Produce documents evidencing a scheme to terminate Plaintiff's employment or membership, December 1, 2021–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of scheme documents. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (scheme documents)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander, Sarah Alaimo; December 2021–2023 (scheme records)</p>
<p>RFP No. 8: Produce communications between Defendants discussing Plaintiff or lawsuit claims, October 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of coordinated communications. Relevant to SAC Appendix A, Causes 8, 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (defendant communications)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell, Sarah Alaimo; October 2020–2023 (communications)</p>

<p>RFP No. 9: Produce communications with Leander discussing Campbell's employment, termination, or membership, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of interference communications. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (Leander communications)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (communications)</p>
<p>RFP No. 10: Produce notes or records reflecting discussions with Leander about Campbell's employment, termination, or membership, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of interference records. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (Leander records)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (personal records)</p>
<p>RFP No. 11: Produce communications with Leander impacting Campbell's job, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of interference communications. Relevant to SAC Appendix A, Cause 10 (Tortious Interference with Employment Expectancy, page 372) and Cause 45 (Hostile Work Environment, Title VII, page 378), alleging job interference.</p>	<p>10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (job communications)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (communications)</p>

<p>RFP No. 12: Produce communications with Leander impacting Campbell's membership rights, January 1, 2020–present.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 support production of interference communications. Relevant to SAC Appendix A, Cause 9 (Tortious Interference with Contract-Membership, page 372) and Cause 53 (Public Accommodation, RCW 49.60.215, page 381), alleging interference.</p>	<p>9: Tortious Interference with Contract-Membership, 53: Public Accommodation (RCW 49.60.215)</p>	<p>¶¶ 5.602–5.658 (membership communications)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (communications)</p>
<p>RFP No. 13: Produce documents reflecting statements to Leander about Campbell's character, job, membership, or personal life, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defamatory documents. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	<p>8: Defamation</p>	<p>¶¶ 5.602–5.658 (statement documents)</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (statement records)</p>
<p>RFP No. 14: Produce documents documenting activities with Leander to interfere with Campbell's relationship, January 1, 2020–present (FAC ¶ 1.17). Legal Foundation: CR 26(b)(1) and CR 34 support production of interference documents. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress.</p>	<p>11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (relationship interference); FAC ¶ 1.17</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Campbell; January 2020–2023 (interference records)</p>

<p>RFP No. 15: Produce communications with Yara Silva regarding Campbell, marital status, or divorce, January 1, 2015–present (FAC ¶ 4.13). Legal Foundation: CR 26(b)(1) and CR 34 permit production of misrepresentation communications. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from misrepresentations.</p>	<p>11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (marital communications); FAC ¶ 4.13</p>	<p>Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2015–2023 (communications)</p>
<p>RFP No. 16: Produce communications with Leander, Norgren, or Swedish Club affiliates regarding Campbell’s membership, employment, or reputation, January 1, 2020–present (FAC ¶¶ 1.17–1.20, 1.24). Legal Foundation: CR 26(b)(1) and CR 34 support production of interference communications. Relevant to SAC Appendix A, Causes 8, 9, 10, and 45 (pages 372, 378), alleging interference and defamation.</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (club communications); FAC ¶¶ 1.17–1.20, 1.24</p>	<p>Lars Matthiesen, Kristine Leander, Elizabeth Norgren, Elizabeth Campbell; January 2020–2023 (communications)</p>
<p>RFP No. 17: Produce financial records of payments or gifts to Campbell, 2019–2021 (FAC ¶ 5.33). Legal Foundation: CR 26(b)(1) and CR 34 permit production of financial records. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging reliance causing distress.</p>	<p>11: Tort of Outrage (IIED)</p>	<p>¶¶ 5.602–5.658 (financial records); FAC ¶ 5.33</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2019–2021 (dental work payments)</p>

<p>RFP No. 18: Produce social media posts referencing Campbell or romantic entanglements, 2020–present (Exhibit P-7). Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory posts. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	8: Defamation	<p>¶¶ 5.602–5.658 (social media posts); Exhibit P-7</p>	<p>Lars Matthiesen, Elizabeth Campbell, Diane, Sandy; 2020–2023 (social media activity)</p>
<p>RFP No. 19: Produce documents related to Campbell’s employment or membership termination, August 15, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of termination documents. Relevant to SAC Appendix A, Causes 9, 10, and 45 (pages 372, 378), alleging interference.</p>	9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII)	<p>¶¶ 5.602–5.658 (termination records)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander, Sarah Alaimo; August 2020–2023 (termination records)</p>
<p>RFP No. 20: Produce documents related to Matthiesen’s Swedish Club membership, January 1, 2017–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of membership documents. Relevant to SAC Appendix A, Cause 9 (Tortious Interference with Contract-Membership, page 372), probing Matthiesen’s club role.</p>	9: Tortious Interference with Contract-Membership	<p>¶¶ 5.602–5.658 (membership records)</p>	<p>Lars Matthiesen, Elizabeth Campbell; January 2017–2023 (club membership)</p>

<p>RFP No. 21: Produce communications with Campbell, January 1, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of relationship communications. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (Campbell communications)</p>	<p>Lars Matthiesen, Elizabeth Campbell; January 2020–2023 (communications)</p>
<p>RFP No. 22: Produce documents related to Highland Holdings, Inc., including ownership or sale plans, 2015–present (FAC ¶¶ 5.28–5.32). Legal Foundation: CR 26(b)(1) and CR 34 permit production of business documents. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from misrepresentations.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (business records); FAC ¶¶ 5.28–5.32</p>	<p>Lars Matthiesen, Elizabeth Campbell, Patrick Fossey; 2015–2023 (Highland records)</p>
<p>RFP No. 23: Produce communications with third parties about Campbell’s personal life or reputation, 2020–present (Exhibit P-7). Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory communications. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	8: Defamation	<p>¶¶ 5.602–5.658 (third-party communications); Exhibit P-7</p>	<p>Lars Matthiesen, Elizabeth Campbell, Diane, Sandy; 2020–2023 (communications)</p>

<p>RFP No. 24: Produce documents related to visits to Campbell's home or her visits to Highland office, 2019–2021 (FAC ¶¶ 5.9, 5.27). Legal Foundation: CR 26(b)(1) and CR 34 permit production of interaction records. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (visit records); FAC ¶¶ 5.9, 5.27</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2019–2021 (home/office visits)</p>
<p>RFP No. 25: Produce financial records discussed with Campbell involving Yara Silva, 2015–present (FAC ¶ 5.43). Legal Foundation: CR 26(b)(1) and CR 34 permit production of financial records. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from misrepresentations.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (financial records); FAC ¶ 5.43</p>	<p>Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2015–2023 (financial records)</p>
<p>RFP No. 26: Produce documents suggesting Campbell was emotionally unstable or unfit, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372), alleging false statements.</p>	8: Defamation	<p>¶¶ 5.602–5.658 (character documents)</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2020–2023 (character records)</p>

<p>RFP No. 27: Produce communications with Silva about altercations disclosed to Campbell, 2015–present (FAC ¶¶ 4.23–4.24). Legal Foundation: CR 26(b)(1) and CR 34 permit production of disclosure communications. Relevant to SAC Appendix A, Cause 11 (IIED, page 372), alleging distress from disclosures.</p>	11: Tort of Outrage (IIED)	<p>¶¶ 5.602–5.658 (altercation communications); FAC ¶¶ 4.23–4.24</p>	Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2015–2023 (communications)
<p>RFP No. 28: Produce documents identifying persons with knowledge of FAC allegations or defenses, 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of witness-related documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)	<p>¶¶ 5.602–5.658 (witness documents)</p>	Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (witness records)
<p>RFP No. 29: Produce documents supporting denial of FAC ¶¶ 3.8, 4.8 (except admitted residency, marriage), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of denial documents. Relevant to SAC Appendix A, Cause 8 (Defamation, page 372).</p>	8: Defamation	<p>¶¶ 5.602–5.658 (denial documents); FAC ¶¶ 3.8, 4.8</p>	Lars Matthiesen, Elizabeth Campbell, Yara Silva; 2020–2023 (denial records)

<p>RFP No. 30: Produce documents supporting Defense 2 (no proximate causation), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (causation defense)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense records)</p>
<p>RFP No. 31: Produce documents supporting Defense 1 (failure to state a claim), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (claim validity)</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2020–2023 (defense records)</p>
<p>RFP No. 32: Produce documents supporting Defense 3 (third-party causation), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (third-party causation)</p>	<p>Lars Matthiesen, Elizabeth Campbell, Kristine Leander; 2020–2023 (defense records)</p>

<p>RFP No. 33: Produce documents supporting Defense 4 (speculative damages), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (damage validity)</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2020–2023 (defense records)</p>
<p>RFP No. 34: Produce documents supporting Defense 5 (failure to mitigate), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (mitigation defense)</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2020–2023 (defense records)</p>
<p>RFP No. 35: Produce documents supporting equitable defenses (Defenses 8, 10), 2020–present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of defense documents. Relevant to SAC Appendix A, Causes 8, 9, 10, 11, 12, and 45 (pages 372, 378).</p>	<p>8: Defamation, 9: Tortious Interference with Contract-Membership, 10: Tortious Interference with Employment Expectancy, 11: Tort of Outrage (IIED), 12: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII)</p>	<p>¶¶ 5.602–5.658 (equitable defenses)</p>	<p>Lars Matthiesen, Elizabeth Campbell; 2020–2023 (defense records)</p>