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**IN THE SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY**

ELIZABETH A. CAMPBELL, an individual,
Plaintiff,

vs.

LARS CHRISTIAN MATTHIESEN,
SHARON LUCAS, TOENE HAYES,
KRISTINE LEANDER, SARAH D.
ALAIMO, SWEDISH CULTURAL CENTER
d/b/a the SWEDISH CLUB, GARY SUND,
SHAMA ALBRIGHT, MOLLY OLSON
SMITH, MARY EMERSON, IB R.
ODDERSON, LANGDON L. MILLER, NEIL
SNYDER, KRIS E. JOHANSSON, MARTIN
K. JOHANSSON, ANNA FAINO and LANE
POWELL PC,
Defendants.

NO. 23-2-25128-8 SEA

**NOTICE OF FILING
SUPPLEMENTAL
DECLARATION OF ELIZABETH
CAMPBELL REGARDING CR
26(I) CONFERRAL EFFORTS
AND IN SUPPORT OF
DISCOVERY MANAGEMENT
AND CR 26(i) CONFERRAL
FRAMEWORK**

TO: All Counsel of Record:

PLEASE TAKE NOTICE that Plaintiff Elizabeth A. Campbell has filed the attached
Supplemental Declaration Regarding CR 26(i) Conferral Efforts, documenting that no
written responses were received by the May 7, 2025 deadline proposed to all defense
counsel. This filing supplements the declaration and exhibits submitted on May 1, 2025, and
preserves the record of Plaintiff's good-faith efforts under CR 26(i) prior to the close of the
discovery response period on May 19, 2025.\\

**NOTICE OF FILING DECL. OF ELIZ. CAMPBELL
IN SUPP. OF DISC. MGMT. FRAMEWORK AND
MEET-AND-CONFER PROCESS - 1**

ELIZABETH A. CAMPBELL
3826 24TH AVE W
SEATTLE, WA 98199
206-769-8459
NEIGHBORHOODWARRIOR

1 DATED May 8, 2025, at Seattle, Washington.

2 Respectfully submitted,

3 
4

5 Elizabeth A. Campbell, MPA
6 Plaintiff, Pro Se
7 3826 24th Ave W
8 Seattle, WA 98199
9 Tel/Text: 206-769-8459
10 Fax: 206-283-6300
11 neighborhoodwarrior@gmail.com

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7 **IN THE SUPERIOR COURT OF WASHINGTON**
8 **IN AND FOR KING COUNTY**

9 ELIZABETH A. CAMPBELL, an individual,
10 Plaintiff,

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16 d/b/a the SWEDISH CLUB, GARY SUND,
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**SUPPLEMENTAL
DECLARATION OF ELIZABETH
CAMPBELL REGARDING CR
26(I) CONFERRAL EFFORTS
AND IN SUPPORT OF
DISCOVERY MANAGEMENT
FRAMEWORK AND MEET-AND-
CONFER PROCESS**

19 I, Elizabeth Campbell, declare under penalty of perjury under the laws of the State
20 of Washington as follows:

21 1. I am the Plaintiff in this matter, proceeding pro se. I make this declaration in
22 further support of my April 16, 2025 discovery requests and the discovery management
23 framework I proposed through written correspondence and my prior declaration filed on
24 May 1, 2025.

25 2.. On May 1, 2025, I filed with the Court my Declaration in Support of Discovery
26 Management Framework and Meet-and-Confer Process, including Exhibits A through J,
SUPP. DECL. OF ELIZ. CAMPBELL RE
CR 26(I) CONFERRAL AND IN SUPP.
OF DISC. MGMT. FRAMEWORK AND
MEET-AND-CONFER PROCESS - 1

ELIZABETH A. CAMPBELL
3826 24TH AVE W
SEATTLE, WA 98199
206-769-8459
NEIGHBORHOODWARRIOR@

1 which documented the service of discovery materials on April 16, 2025, and all related
2 correspondence with defense counsel through April 30, 2025.

3 3. That declaration established my efforts to comply with CR 26(i), CR 33, and CR 34,
4 and offered defense counsel a structured, fair, and group-specific process to assert
5 objections and participate in written conferral. I made these efforts in light of the
6 complexity of the litigation, the divergent factual and legal positions of the parties, and to
7 avoid procedural confusion and prejudice.

8 4. On May 1, 2025, I sent a follow-up email to all defense counsel reiterating the
9 previously stated staggered deadlines for each group to provide written responses to my
10 Discovery Request Summaries. In that same communication, I offered a uniform fallback
11 deadline of May 7, 2025 for all defense groups to submit at least preliminary, written
12 objections or comments. A true and correct copy of that May 1 email is attached hereto as
13 Exhibit K.

14 5. My May 1 email made clear that the May 7 fallback deadline was offered in a
15 good-faith effort to promote engagement and fairness and that written responses by that
16 date would not waive any group's formal obligations under CR 33 or CR 34. Rather, it was
17 proposed to facilitate the conferral process and allow for resolution of disputes without
18 court intervention.

19 6. As of the date of this filing, May 8, 2025, I have received no written responses or
20 objections from any defense group by the fallback deadline of May 7, nor by the group-
21 specific deadlines previously set forth in my April 29 correspondence.

22 7. Accordingly, pursuant to CR 26(i), I certify that I have made a good-faith effort to
23 confer with opposing counsel to resolve discovery disputes. My conferral efforts were
24 timely, individualized, and proportionate under the circumstances.

1 8. I reserve the right to file one or more motions to compel following the expiration
2 of the 30-day discovery response period on May 19, 2025, should responses not be served
3 or should specific discovery disputes remain unresolved.

4
5 I declare under penalty of perjury under the laws of the State of Washington that
6 the foregoing is true and correct.

7 DATED May 8, 2025, at Seattle, Washington.

8 Respectfully submitted,

9 
10

11 Elizabeth A. Campbell, MPA
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Exhibit Index – Declaration of Elizabeth Campbell

Exhibit K – Plaintiff’s May 1, 2025 Email to All Defense Counsel Reiterating Prior Discovery
Deadlines and Proposing May 7, 2025 Fallback Deadline

CERTIFICATE OF SERVICE

I, Elizabeth A. Campbell, certify that on May 8, 2025 I caused to be served a true and correct Word and PDF copy of the foregoing 1) NOTICE OF FILING, 2) SUPPLEMENTAL DECLARATION OF ELIZABETH CAMPBELL REGARDING CR 26(I) CONFERRAL EFFORTS AND IN SUPPORT OF DISCOVERY MANAGEMENT FRAMEWORK AND MEET-AND-CONFER PROCESS via the method indicated below and addressed to the following:

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Attorney for Defs Hayes, Leander

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED May 8, 2025, at Seattle, Washington.



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EXHIBIT K



Elizabeth Campbell <neighborhoodwarrior@gmail.com>

Discovery Lead Case No. 23-2-25128-8 Elizabeth Campbell v. Matthiesen et al

Elizabeth Campbell, MPA <neighborhoodwarrior@gmail.com>

Thu, May 1 at 8:26 AM

To: Nicholas Larson <NLarson@mpbf.com>

Cc: Alex Lopez <alopez@ohaganmeyer.com>, Brad Bigos <bbigos@ohaganmeyer.com>, Kalzer, Karen A. <kkalzer@helsell.com>, Megan F. Starks <mstarks@pattersonbuchanan.com>, Miguel Mendez-Pintado <mmendezpintado@mpbf.com>, Sarah A. Tatistcheff <SAT@pattersonbuchanan.com>, Elizabeth Campbell <Neighborhoodwarrior@gmail.com>

To All Defense Counsel of Record

Re: Discovery Management and CR 26(i) Conferral – Declaration Filed

Dear Counsel,

Thank you for your continued correspondence regarding discovery.

As previously stated, I remain committed to fulfilling my obligations under CR 26(i) and CR 1 to engage in good-faith efforts to resolve discovery disputes. To facilitate that process, I have provided each defendant group with tailored discovery requests, supported by individualized Discovery Request Summaries correlating each interrogatory and RFP to specific causes of action and allegations in the Second Amended Complaint.

Given the complexity of this litigation—56 causes of action, a 383-page complaint, 16 defendants represented by four different sets of counsel, four very different Answers,—a meaningful and proportionate meet-and-confer process must reflect the reality that defendants' defenses, culpability, and factual circumstances are not aligned.

I'm reiterating my request that each defense group respond to the discovery summaries in writing by the dates I have already proposed. My framework allows each group to assert objections or concerns in writing, on the record, and engage in good-faith efforts to resolve issues prior to involving the Court.

This approach is consistent not only with CR 26(i), but with the Washington Supreme Court's recognition in *Mayer v. Sto Industries, Inc.*, 156 Wn.2d 677, 684–85 (2006), that

“The discovery rules... contemplate that parties will make a good-faith effort to resolve discovery disputes without court involvement.”

Additionally, the Washington Civil Discovery Deskbook confirms that written exchanges are an accepted and appropriate form of CR 26(i) compliance, stating: “Where the parties have made meaningful efforts in writing to resolve disputes, courts have accepted that as sufficient.”

To document and support this process, I have today filed with the Court a Declaration with Exhibits A–J, providing a detailed record of my efforts to manage discovery in a fair, transparent, and efficient manner. A copy of the declaration is attached.

The summaries and written communications I’ve provided offer a practical and transparent framework for you to assert objections or negotiate discovery issues on the record — without prematurely resorting to motion practice. Should defense counsel nevertheless pursue such motions, the attached declaration and exhibits will demonstrate that I have acted in accordance with the spirit and requirements of the Civil Rules.

I feel it is unfortunate, but I am under the impression that defense counsels’ stated preference not to meet individually with me “at this time”, the insistence that only a Zoom/phone call will suffice, and the refusal to put anything in writing, including even a rudimentary explanations or justification for this "ALL" call, has all the hallmarks of a defense, strategic effort to engineer a pretextual, procedural record for potential motion practice without first meaningfully engaging on the merits of the discovery requests.

And fundamentally, a collective meet-and-confer would create confusion, undermine the clarity of the issues to be addressed, or potentially prejudice my ability to fairly and efficiently resolve discovery disputes, and would prejudice me as a pro se party against represented defendants.

The structured approach I have proffered, notably without any being suggested in return, I feel also addresses my concerns in light of this, that there has never been a time in the history of this case where opposing counsel has indicated any level of interest in engaging in discovery; and I also have additional concerns, Ms. Kalzer has a blatant history of obstructing discovery, *J.B., M.B., and D.L. v. Corporation of the Catholic Archbishop of Seattle* for example, resulting in prolonged delay and prejudice to the plaintiffs when it happened.

I feel that same pattern is emerging in this matter, including the rejection of my structured framework and coordinated discovery efforts.

In an effort to avoid unnecessary escalation and further court involvement, I am willing

to consider a limited, preliminary written response from each defense group individually — but only if such submission includes meaningful, individualized concerns tied to specific discovery requests and is received by May 7, 2025. This will not waive the what I feel is an obligation to provide me with specific responses to my discovery summaries and pending requests; but may help jump start the conferral process and help focus any follow-up conferral discussions.

I look forward to working through any legitimate concerns or objections in an efficient, transparent, and rule-compliant manner. My approach is designed to support meaningful resolution and minimize unnecessary motion practice.

Sincerely,

Elizabeth Campbell
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neighborhoodwarrior@gmail.com
(206) 769-8459
[Quoted text hidden]
Elizabeth Campbell, MPA



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