

Honorable Judge Larrañaga  
Hearing: May 22, 2025  
Without Oral Argument

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**SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN THE COUNTY OF KING**

ELIZABETH A. CAMPBELL, an  
individual,

Plaintiff,

v.

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**

**DECLARATION OF ELIZABETH A.  
CAMPBELL IN SUPPORT OF MOTION  
FOR CLARIFICATION OR CORRECTION  
OF ORDER DENYING MOTION  
REQUESTING PRESERVATION OF  
JUDGE'S WORKING PAPERS FOR CASE  
NO. 23-2-25195-4 UNDER CR 60(a)**

I, Elizabeth A. Campbell, declare under penalty of perjury under the laws of the State of Washington that the following is true and correct:

1. I am the Plaintiff in this action, proceeding pro se, and have personal knowledge of the facts stated herein unless otherwise indicated.

2. On March 24, 2025, I filed a motion to preserve Judge Holloway's working papers, including two hearing binders for the June 28, 2024, motion to dismiss hearing, due to defendants' omission of five opposition briefs from my notebook copy (Dkt. #124, pp. 7-8). The

DECLARATION OF ELIZABETH CAMPBELL IN  
SUPPORT OF MOTION FOR CLARIFICATION OR  
CORRECTION UNDER CR 60(A) - 1

Elizabeth A. Campbell  
3826 24<sup>th</sup> Ave W  
Seattle, WA 98199  
206-769-8459  
neighborhoodwarrior@gmail.com

1 Hearing Management Order (Dkt. #201) required defendants to include all parties' materials,  
2 indicating Judge Holloway relied on the notebook, not e-filed records. A true and correct copy of  
3 Dkt. #201 is attached as **Exhibit A, Page 1**.

4 3. Defendants' opposition conceded to preserving the binders, admitting their relevance and  
5 minimal burden, but opposed preserving notes (Dkt. #149, p. 4). They also confirmed my May  
6 21-23, 2024, filings, including for Motion #4 (Dkt. #30, p. 21). A true and correct copy of Dkt.  
7 #149, p. 4, is attached as **Exhibit B, Page 4**.

8 4. My federal filing (Case No. 2:24-cv-00816-JLR, Dkt. #30, pp. 11-15, defendants' Ex. 1)  
9 detailed defendants' exclusion of briefs for Motions #1, #4, #7, and #8, placing my filings  
10 "hundreds of pages later, un-tabulated" (Dkt. #30, p. 12). This compromised the record, likely  
11 prejudicing Order #4 (September 27, 2024). A true and correct copy of Dkt. #30, pp. 11-15, is  
12 attached as **Exhibit C, Page 5**.

13 5. On May 21, 2024, the Clerk rejected 46 pages of my 69-page opposition brief to Motion  
14 #4 (Dkt. #224) for formatting errors (GR 14, LCR 10, CR 10), filing only 23 pages, without  
15 notice until February 14, 2025, when I discovered it while drafting an appellate motion (Motion  
16 to Stay, Court of Appeals No. 874985, pp. 6-14, Ex. A). This limited the e-filed record,  
17 increasing reliance on the notebook. A true and correct copy of Motion to Stay, pp. 6-14, and Ex.  
18 A (pp. 37-42) is attached as **Exhibit D, Pages 10-21**.

19 6. Judge Holloway refused to consider filings not submitted via the eWorking Copies  
20 Portal, which required a \$40 fee, despite my indigent status, as shown by an unrulid motion due  
21 to a fee issue (Dkt. #30, p. 19) and my requests for email authorization (Holloway Comms, pp.  
22 82-83, Oct. 11-31, 2024). This meant Holloway relied on the notebook, which omitted my briefs.  
23 A true and correct copy of Holloway Comms, pp. 82-83, is attached as **Exhibit E, Pages 22-23**.

24 7. On April 21, 2025, the Court issued an order captioned "GRANTING IN PART AND  
25 DENYING IN PART" but fully denying my motion (Order, pp. 1, 3). This inconsistency

1 suggests a clerical error in drafting, likely by the judge or bailiff, mis-reflecting the Court's  
2 intent to preserve the binders, as supported by defendants' concession and the record's  
3 deficiencies (*In re Marriage of Getz*, 57 Wn. App. 177, 181 (1990)). A true and correct copy of  
4 the Order, pp. 1, 3, is attached as **Exhibit F, Pages 24-25**.

5 8. The Clerk's rejection, Holloway's portal reliance, and defendants' omissions likely left  
6 Judge Holloway without my opposition to Motion #4, prejudicing Order #4 (*Hazel-Atlas Glass*  
7 *Co.*, 322 U.S. 238, 246 (1944)). These irregularities explain why the Court intended to preserve  
8 the binders, as the caption indicates, to ensure a complete record (*Nixon v. Warner*  
9 *Communications*, 435 U.S. 589, 598 (1978)).

10 9. Defendants' concession (Dkt. #124, p. 3) aligns with the caption, showing the Court  
11 recognized the binders' relevance, especially given the case's complexity (84 claims, Motion to  
12 Stay, p. 27) and my pro se challenges, including discovery disputes (Decl. of Campbell, ¶ 2-4, 7-  
13 9; *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)).

14 10. In early May 2025, I filed a notice and declaration addressing discovery conflicts with 16  
15 defendants, involving disputes over interrogatories, requests for production, and meet and confer  
16 negotiations. These conflicts, ongoing since April 2025, overwhelmed my resources, delaying  
17 my response to the April 21, 2025, order (*Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S.  
18 306, 314 (1950)). A true and correct copy of the Declaration Regarding Discovery Conflicts, pp.  
19 1-3 and the Declaration's Exhibit G filed on May 2025, is attached as **Exhibit G, Pages 26-32**.

20 11. I discovered the inconsistency in the caption and body of the April 21, 2025, order in  
21 early May 2025 while preparing appellate filings and reviewing the hearing binder issues. I acted  
22 promptly to draft and file this motion upon recognizing the discrepancy and the potential  
23 prejudice to the record. My delay from April 21 to early May is attributable to ongoing discovery  
24 conflicts involving 16 defendants, which consumed substantial time and resources.

1 12. Preserving the binders imposes no burden and ensures fairness for my appeal (*Court of*  
2 *Appeals* No. 874985), as the Court likely intended per the caption (*Dreiling v. Jain*, 151 Wn.2d  
3 900, 907 (2004)).

4 I declare under penalty of perjury that the foregoing is true and correct.

5 DATED: May 6, 2025 at Seattle, Washington.

6 Respectfully Submitted,

7 

8 Elizabeth A. Campbell, MPA

9 Plaintiff, Pro Se

10 3826 24th Ave W, Seattle, WA 98199

11 206-769-8459

12 neighborhoodwarrior@gmail.com

## **EXHIBITS TABLE OF CONTENTS**

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# EXHIBIT A

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## SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

In re:

ELIZABETH CAMPBELL,

Plaintiff

vs.

SHARON LUCAS, MOLLY OLSON  
SMITH, ET AL.,

Defendants

NO. 23-2-25195-4 SEA

**AMENDED**  
HEARING MANAGEMENT ORDER

This matter is scheduled for hearing Friday, May 24, 2024 on numerous motions, including, Defendants' Summary Judgment and sixteen (16) Motions to Dismiss, brought by various defendants. When scheduling this matter for hearing, defendants requested and were allocated court time of approximately one (1) hour for two (2) motions.

**THE COURT**, in keeping with its wide discretion to exercise reasonable control over the orderly presentation of argument and evidence, while considering interests of litigants to appropriately argue their motions, Finds and Orders as follows:

1. The motions are scheduled for hearing to occur Friday, May 24, 2024 at 1:30 PM. All motions are brought by defendants.
2. Defendants shall have a total of twenty (20) minutes of time for oral argument in furtherance of all motions. The time allocated to defendants is inclusive of any intended rebuttal argument. Defendants may allocate their argument time between attorneys and/or individual defendants.
3. Plaintiff shall have a total of twenty (20) minutes of time for oral argument in defense of all motions.
4. Defendants counsel shall provide the court with a Notebook containing all materials submitted by all parties for defendants' motions. The Notebook should be divided by motion and should be organized by subject matter, with each individual submission

1 separately tabulated. Each tabulated motion shall include the proposed order(s) for that  
2 motion.

- 3 5. The court also requests a brief summary of the pending motions which generally  
4 identifies each legal issues presented across the multiple motions, cross references the  
5 motions by complimentary factual and legal issues, and identifies which motions are  
6 joined by defendants. For example, the court notes several motions which argue  
7 dismissal pursuant to CR 8 and CR 12; the court would appreciate the summary noting  
8 whether those motions contain complimentary or separate legal and factual theories.  
9 6. Defendants shall deliver the Notebook and brief summary to the court by 4:00 PM on  
10 Tuesday, May 21, 2024, ~~Friday, May 17, 2024~~, to the judge's mailroom on the 2<sup>nd</sup> floor of  
11 the King County courthouse in downtown Seattle. A copy shall also be delivered to plaintiff;  
12 it may be mailed or otherwise delivered by courier for delivery by no later than Wednesday,  
13 May 22, 2024. ~~Monday, May 20, 2024~~.  
14 7. The hearing on all motions shall occur on the Zoom platform

15 **Judge Holloway Zoom Meeting**

16 Zoom Web

17 <https://kingcounty.zoom.us/j/84323841706> - NO PASSCODE REQUIRED.

18 Meeting ID: 843 2384 1706

19 Zoom Mobile

20 +12532050468,,84323841706# US or +12532158782,,84323841706# US  
21 (Tacoma)

22 Find your local number: <https://kingcounty.zoom.us/j/84323841706>

23 Join by SIP: 84323841706@zoomcrc.com

24 Join by H.323: 162.255.37.11 (US West) or 162.255.36.11 (US East)

25 Meeting ID: 843 2384 1706

Join by Skype for Business: <https://kingcounty.zoom.us/skype/84323841706>

DATED: May 14, 2024

\_\_\_\_\_  
Judge Jason Holloway

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 23-2-25195-4  
Case Title: CAMPBELL VS LUCAS ET AL  
Document Title: ORDER RE HEARING MANAGEMENT-AMENDED  
Signed By: Jason Holloway  
Date: May 14, 2024



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Judge: Jason Holloway

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 24DDFCEB02A3A11F5C3288B0443FB81E69669334  
Certificate effective date: 3/10/2022 5:01:02 PM  
Certificate expiry date: 3/10/2027 5:01:02 PM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Jason Holloway:  
SiMotsmN7BG0js09aD1J&#43;g=="

Page 3 of 3

## EXHIBIT B

Plaintiff claims *Bone-Club* case highlights the need for procedural fairness and transparency in judicial proceedings.

Defendants do not oppose the preservation of the hearing binders submitted to Judge Holloway. However, Plaintiff has not articulated the established the type of exceptional circumstances to require preservation of Judge Holloway's own notes, annotations, etc., as she has requested in the Motion. The authorities provided by Plaintiff only deal with preservation of judicial records in a criminal context. She cites no law or facts to support the preservation of Judge Holloway's working papers, notes, annotations, and related documents used in reaching "prior rulings or decisions in this matter." Plaintiff merely argues, in conclusory fashion that these working copies "may contain critical information, annotations, or notes that are essential to ensuring a fair review and understanding of the judicial decision-making process", specifically highlighting their potential use in any appellate review or "further proceedings."

While Plaintiff clearly seeks the hearing binders, as she has articulated elsewhere, she has not established any need for preservation of other working documents relied upon by Judge Holloway. Plaintiff's request for all notes and annotations, etc. is overreaching.

### III. CONCLUSION

Although Defendants do not object to the preservation of the hearing binders submitted to Judge Holloway in connection with the oral arguments heard on June 28, 2024, Plaintiff has not articulated or established exceptional circumstances which justify the scope of preservation she seeks. This Court should deny in part Plaintiff's motion except as it relates to Judge Holloway's June 28 hearing binder.

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**EXHIBIT C**

Because of defense counsels' egregious misconduct in state court, their successful efforts to put their thumb on the scale and tilt the filings and evidence submitted to the Judge, theirs but not Plaintiff's, Defendants' conduct in that regard alone likely resulted in Orders #4, #8, and #14 having a legally disturbing provenance, and perhaps no validity at all, i.e., Rule 60(b) provides that a court may relieve a party from a final judgment for the following reason, "(3) fraud . . . misrepresentation, or other misconduct of an adverse party." *Stewart v. O'Neill*, No. 00 Civ. 8560 (SAS), (S.D.N.Y. Aug. 16, 2002)

**C. Defendants' Failure to Follow Court Orders – The Hearing Notebook.**

In May of 2024 Defense counsels were under court order to provide the state court hearing judge with a notebook that not only included the passel of Defendants' motions to dismiss pleadings and the like, but also *to include all of Plaintiff's opposition briefs and declarations*. That is not what happened. Instead, defense counsel only provided a portion of Plaintiff's filings, leaving out her opposition briefs for six motions to dismiss, including for Motion/Order # 4 (post termination claims), and Motion/Order #8 (Norgren summary judgment).

Order #4 and Order #8 may very well be void due to the procedural irregularities or even the fraudulent means opposing counsels' used to obtain them. Defense counsels' actions as described below could be considered equivalent to engaging in material misrepresentations to the state court vis-à-vis Defendants' intentional exclusion of Plaintiff's briefs from the Judge's notebook. Coupled with the other significant procedural irregularities that are discussed below, Plaintiff believes that defense counsel engaged in to obtain the multiple favorable outcomes they did, to use another legal analogy or metaphor, it's like a civil version of a Brady violation, Defendants hiding Plaintiff's favorable or helpful evidence.

On May 14, 2024 the assigned, Honorable Judge Holloway in the *Lucas Case* issued a Hearing Management Order<sup>19</sup> directed to Defendants' counsels that they, *not the Plaintiff*, were solely responsible for preparing the Judge's hearing Notebook for the then May 24, 2024 hearing: "Defendants [sic] shall provide the court with a Notebook containing all materials submitted by all parties for defendants' motions. The Notebook should be divided by motion and should be organized by subject matter, with each individual submission separately tabulated. Each tabulated motion shall include the proposed order(s) for the motion."<sup>20</sup> Court's emphasis. A copy of the Amended Hearing Management Order is attached and included herein as **Exhibit A**.

**1. Defendants' Exclusion of Plaintiff's Opposition Briefs.** Defense counsels did not include in the Judge's Hearing Notebook Plaintiff's opposition briefs for not just Motion to Dismiss #4 (post termination claims), but also for the Summary Judgment Motion #8 (Elizabeth Norgren) (and for several other of the motions to dismiss); and rather than what briefs of Plaintiff's defense counsels did include, instead of those being bundled as the Court ordered, to be included with each of the respective tabulated motions to dismiss that they related to, Plaintiff's filings were stashed away, hundreds of pages later, unidentified, un-tabulated, at the very end of the second volume of the hearing notebook.

To confound Plaintiff's case further, on May 20<sup>th</sup> Defendants filed a motion to strike Plaintiff's "untimely briefing" – falsely claiming that all of Plaintiff's May 20<sup>th</sup> filings were late when they were not.<sup>21</sup>

<sup>19</sup> King County Superior Court Case No. 23-2-25195-4. "Hearing Management Order/Amended," Dkt. #201.

<sup>20</sup> Id. Page 1-2, Lines 25, 1-2.

<sup>21</sup> *Lucas Case*. Dkt. #220

1 The allowed response time to a motion to dismiss is governed by King County LCR 7  
 2 Motions – an opposition brief is to be filed four judicial days before hearing, making the due date  
 3 for all but one of Plaintiff’s opposition briefs May 20th. Plaintiff filed 10 out of 15 of her briefs  
 4 on May 20th.

5 The response time for a CR 56(c) Summary Judgment motion dictates that Plaintiff’s  
 6 brief would have been due ten days after the filing of the motion, or May 13th. However, *in the*  
 7 *intervening time before any of Plaintiff’s responsive pleadings were due*, on 5/10 Plaintiff filed a  
 8 Motion for Continuance<sup>22</sup> citing health difficulties and lack of discovery, giving notice to the  
 9 Defendants and the Court about the difficulty Plaintiff was having meeting her briefing deadlines  
 10 due to poor health, and that she also needed time to conduct discovery related to the summary  
 11 judgment motion.<sup>23</sup>

12 “The motions were filed on April 26th; prior to that date and to now Plaintiff has  
 13 been not allowed to conduct any discovery which clearly prejudices opportunity to provide  
 14 a cogent and considered response by the Plaintiff to those summary judgment motions. As  
 15 the non-moving party Plaintiff would be able to comb not just its records, but those of the  
 16 defendants in an effort to identify facts and evidence, including depositions, documents,  
 electronically stored information, affidavits, stipulations, admissions, interrogatory  
 answers, or other materials, that will convince the judge that material factual disputes  
 remain. Plaintiff has had none of that opportunity so far; a continuance will remedy that  
 disadvantage Plaintiff has at this point.”<sup>24</sup>

17 “The Swedish Club 13 have sought and successfully blocked all of Ms. Campbell’s  
 18 efforts to engage in discovery; while maintaining a pole position that only their discovery  
 19 should be permissible. The Swedish Club 13 opposed each of Ms. Campbell’s SDT  
 requests; none were granted, and none of Ms. Campbell’s interrogatories/RFP have been  
 answered.

20 “Twice, on April 19th, and on May 6th Ms. Campbell asked that the Court issue an  
 order making the discovery playing field equitable, that not just her discovery be stayed

21  
 22 <sup>22</sup> *Lucas Case*, Dkt. #197.

23 Defendants have successfully opposed Plaintiff’s discovery efforts in the *Lucas Case* now for close to a year;  
 beginning in April of 2024; discovery has been stayed that whole time until March 4, 2025.

24 Motion and Declaration in Support of Motion to Continue May 24, 2024 Motion to Dismiss Hearing [For] 45  
 Days.” *Lucas Case*. Dkt. #197. Page 2, Lines 3-8.

1 but that all parties' discovery be stayed. On May 7th the court issued a stay on all discovery  
2 in this matter pending hearing on May 24th and Orders therefrom."<sup>25</sup>

3 Despite the foregoing events, including that Plaintiff *did timely file* Defendants filed an  
4 opposition brief against Plaintiff's motion for continuance, and the motion to strike Plaintiff's  
5 May 20th filings, and a motion requesting that all of Defendants' motions to dismiss and the  
6 summary judgment motion be granted claiming that Plaintiff had failed to respond to  
7 Defendants' motions to dismiss. The later never happened. The Judge did not take up  
8 Defendant's requests.

9 On May 23rd the Judge sent an email to the parties and continued the scheduled May 24<sup>th</sup>  
10 MTD hearing to June 28th, citing Plaintiff's health challenges. No continuance order was  
11 entered. The email made no mention of Plaintiff's motion request for an opportunity to pursue  
12 discovery. A copy of the email is attached and incorporated herein as **Exhibit B**.

13 In the then intervening time, between May 23<sup>rd</sup> and June 28<sup>th</sup>, defense counsel Michael  
14 Rhodes<sup>26</sup> 1) supplemented the Judge's hearing Notebook on June 24<sup>th</sup> with 16 additional defense  
15 reply briefs<sup>27</sup> supporting the Defendants' motions to dismiss/summary judgment motion, but 2)  
16 excluded Plaintiff's May 21<sup>st</sup>, 22<sup>nd</sup>, and 23<sup>rd</sup> filings, five opposition briefs, and a strict reply<sup>28</sup> to  
17 Defendant Norgren's Motion #8 reply; i.e., Plaintiff's surreply challenging the truthfulness of  
18 Defendant Norgren's statements and pointing out Counsel Rhodes' insistence on filing not one  
19 but two perjured declarations by Norgren.

20 <sup>25</sup> Id. Page 4, Lines 3-19.

21 <sup>26</sup> Michael Rhodes who has since withdrawn from this case and the state course cases due to conflicts of interest,  
22 took ownership of preparing the Judge's hearing Notebook pursuant to the May 14<sup>th</sup> Order; He represented all but  
23 three of the defendants in the state court case, including the Swedish Club and Elizabeth Norgren. .

<sup>27</sup> *Lucas Case*, Defendants' 06-24-24 Replies, Dkt. #s 290, 291, 292, 293, 294, 296, 297, 298, 299, 300, 301, 303,  
305, 306, 307, and 308.

<sup>28</sup> *Lucas Case*, "Plaintiff's Surreply to Defendant Swedish Club Executive Director Elizabeth Norgren's Motion for  
Summary Judgment [Motion 8] and Supporting False First Declaration (April 26, 2024) and False Second  
Declaration (June 20, 2024)." Dkt. #311

On May 21<sup>st</sup>, 22<sup>nd</sup>, and 23<sup>rd</sup> Plaintiff filed the remainder of her opposition briefs, including those for Motion #4 (Post termination Claims) and #8 (Norgren summary judgment) – Defendants excluded all of those pleadings from the hearing notebook.

**D. Defendants’ 2nd and 3rd Bites at Plaintiff’s Case.** In addition to the order that defense counsels were to provide a complete hearing notebook to the judge, they also were ordered to provide a "brief summary," a limited overview of the pending motions, “a brief summary of the pending motions which generally identifies each legal issue presented across the multiple motions...whether those motions contain complementary or separate legal and factual theories.”<sup>29</sup> A copy of the brief summary provided by defense counsel is attached and included herein as **Exhibit C**.<sup>30</sup>

**Bite 2.** Rather than defense counsel adhering to the Judge’s instructions to provide a non-argumentative, non-prejudicial, brief summary of legal issues, defense counsel instead did include multiple argumentative statements, pro defense statements regarding Defendants’/defense counsels’ position on multiple items, but especially against Plaintiff’s interests. Defense counsel Rhodes included in the summary statements that Plaintiff’s briefs were untimely, and emphasized that Defendants’ had filed and included in the notebook a Motion to Dismiss Plaintiff’s briefings.

In eleven out of 18 of the “brief summaries” defense counsel made impermissible, prejudicial arguments; for example:

<sup>29</sup> King County Superior Court Case No. 23-2-25195-4. “Hearing Management Order/Amended,” Dkt. #201.

<sup>30</sup> Id. “CAMPBELL vs. LUCAS, et al...Defendants’ Motions to Dismiss...Brief Summary of Motions.” Insertion included in Judge’s May 24, 2024 Hearing Notebook.

## EXHIBIT D

claims or parties only upon an express determination in the judgment, supported by written findings, that there is no just reason for delay and upon an express direction for the entry of judgment. The findings may be made ...on motion of any party.”<sup>3</sup>

### **No delay in granting certification/partial judgement.**

The successful CR 54(b) certification does not necessarily result in a stay of further trial court proceedings.<sup>4</sup> In fact, an order adjudicating less than all claims remains subject to revision.<sup>5</sup>

### **2) Motion pursuant to CR 60(b)(1) Clerical Error – Seeking Vacation of Order Motion #4 Plaintiff’s Post Termination Claims**

On February 14, 2024 while drafting the Motion for Discretionary Review, Petitioner was verifying docket numbers in the underlying case records for the Order on Motion #4, the

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<sup>3</sup> Washington Court Rule 54(b).

<sup>4</sup> See RAP 7.2(1). This rule speaks to CR 54(b) certifications.

<sup>5</sup> *Washburn v. Beatt Equip. Co.*, 120 Wn.2d 246, 300, 840 P.2d 860 (1992).

motion to dismiss and Plaintiff's filings for the same. That is when Plaintiff discovered that the King County Superior Court Clerk's Office had rejected the majority of Petitioner's opposition brief against Motion #4 that was filed on May 21, 2024,<sup>6</sup> specifically the exhibit portion of the brief which would have refuted a large portion of, if not all of Defendants' contentions in their Motion #4.

At the time of filing Petitioner's brief was 69 pages long. After the Clerk's Office's processing of it only 23 pages were filed into the record, 46 pages of supporting evidence against MTD #4 were eliminated from the brief.

On May 23<sup>rd</sup> the Clerk's Office filed into the case record three Faulty Document Notices; and on May 24<sup>th</sup> it filed three more Faulty Document Notices – on the basis that Petitioner's

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<sup>6</sup> King County Superior Court Case No. 23-25195-4, "Plaintiff's Response and Opposition to Defendants Lucas, Smith, Sund, Norgren, Albright, Emerson, Odderson, Salmon, Miller, Schee, Snyder, Lindstrom, Johansson, Faino, Alaimo, Swedish Cultural Center, and Swedish Club Foundation Motion to Dismiss Campbell's Post-Termination Claims [Motion 4]." Dkt. No. 224.

filing had formatting errors:

“The names on the case caption are missing. For additional information, you can review Local Court Rule (LCR) 84, LCR 10, and/or Court Rule (CR) 10. (Case Caption means the official title of the case. For example, (Commonwealth v. Smith, or Jane Jones and Sam Jones) (ID #1) NOT COMPLY WITH GR14 FORMATTING

“Per General Rule (GR) 14, this document does not comply with formatting requirements for documents filed with the court. The top margin of the first page must be a minimum of three inches.”

A copy of the Faulty Document Notices is attached and incorporated herein as Exhibit A. Appendix, Page 1.

Because the Clerk’s Office directly filed its notices into the record, no auto generated e-filing notice went to the Petitioner, neither did the Clerk’s Office specifically notify Petitioner that their documents had been rejected.

Petitioner had no idea until now five months after the entry of Order #4 dismissing 10 defendants and over 15 causes of action that two-thirds of her opposition brief to MTD #4 was never before the Court.

Accordingly, this newly discovered evidence was not available to Plaintiff at any time between when the Defendants’

Motion to Dismiss #4 was filed, April 26, 2024, on through to the time of the hearing on the motion on June 28, 2024, or at the time of the Court's ruling on September 27, 2024. *Wagner Dev., Inc. v. Fid. & Deposit Co. of Md.*, 95 Wn. App. 896, 906, 977 P.2d 639 (1999).<sup>7</sup>

The Clerk's Office's improper rejection of two thirds of Petitioner's opposition brief without notice presents a due process problem, as Petitioner was deprived of the opportunity to correct the deficiency and to properly present to the trial court at the time it considered Defendants' Motion to Dismiss #4, its entire opposition brief which would have included evidence against the grant of that motion.

Due process requires "notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to

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<sup>7</sup> "A mere allegation of diligence is not sufficient; the moving party must state facts that explain why the evidence was not available for trial." *Peoples v. City of Puyallup*, 142 Wash. 247, 248, 252 P. 685 (1927).

present their objections.” *Olympic Forest Prods., Inc. v. Chaussee Corp.*, 82 Wn.2d 418, 422, 511 P.2d 1002 (1973) (quoting *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 314, 70 S. Ct. 652, 94 L. Ed. 865 (1950)); in this case Plaintiff was not afforded the opportunity to present the entirety of their objections/opposition to Motion #4, which included a substantial amount of documentary evidence.

Petitioner’s evidence was timely submitted but improperly excluded due to King County Clerk’s Office document processing irregularities. The rejection of Petitioner’s documents materially impacted the ruling on Motion #4, i.e., in this instance the inability to present evidence on a crucial motion to dismiss is analogous to the unauthorized surrender of a "substantial right". See *Graves v. P.J. Taggares Co.*, 94 Wash.2d 298, 616 P.2d 1223 (1980).

Had this evidence been available at the time of the Court’s rulings on Motion #4, the outcome would likely have been

different. See *Jones v. City of Seattle*, 179 Wn.2d 322, 360, 314 P.3d 380 (2013) (granting CR 60(b)(3) relief when newly discovered evidence would probably change the result of the case's outcome).

Petitioner's forthcoming motion will request that the Court use its discretion to allow correction and supplementation of the record, vacate the Dismissal of Petitioner's claims against Defendants Lucas, Sund, Emerson, Snyder, Johansson<sup>2</sup>, Faino, Alaimo, the Swedish Club, the Swedish Club Foundation, and permit the case to proceed based on the newly discovered evidence.

**3) Forthcoming motion pursuant to CR 60(b)(3) Newly Discovered Evidence – Seeking Vacation of Order Motion #5 Dismissing Swedish Club Foundation**

The former opposing counsel represented the Swedish Club and Swedish Club Foundation throughout the entire course of this litigation knew the identities of the real parties in interest since the initiation of the lawsuit, as demonstrated in the insurance policy papers Plaintiff intends to submit as newly



**King County**  
**Department of Judicial Administration**  
*Catherine Cornwall*  
*Director and Superior Court Clerk*  
 (206) 296-9300 (206) 296-0100 TTY/TDD

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## EXHIBIT A

May 23, 2024

### Faulty Document Notice

Case Caption: CAMPBELL VS LUCAS ET AL

Case No.: 23-2-25195-4 SEA, Sub: 225

In Re File Name: Part 2 Campbell Reply to Motion to Dismiss 4.pdf

Dear Filing Party:

Your document **Reply** submitted to the Clerk on **05/21/2024** for filing into the official court record has been rejected. The Clerk's Office cannot process the document for the following reason(s):

**Other: The names on the case caption are missing. For additional information, you can review Local Court Rule (LCR) 84, LCR 10, and/or Court Rule (CR) 10. (Case Caption means the official title of the case. For example, (Commonwealth v. Smith, or Jane Jones and Sam Jones)**

**Per General Rule (GR) 14, this document does not comply with formatting requirements for documents filed with the court. The top margin of the first page must be a minimum of three inches.**

Please contact the Caseflow Section if you have questions or need additional information.

Sincerely,

Caseflow Seattle 206-477-6537

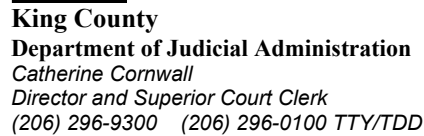
To view this letter in Spanish, Chinese, Russian, Somali, Amharic or Vietnamese, please visit <https://cdn.kingcounty.gov/-/media/king-county/depts/dja/cf-faulty/home>

cc: Court File

*King County Courthouse*  
 516 Third Avenue Room E609  
 Seattle, WA 98104-2386

*Maleng Regional Justice Center*  
 401 Fourth Avenue North Room 2C  
 Kent, WA 98032-4429

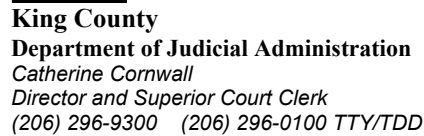
*Clark Children & Family Justice Center*  
 1211 East Alder Room 3015  
 Seattle, WA 98122-5598



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## Faulty Document Notice

Plaintiff's Exhibits Page - 17

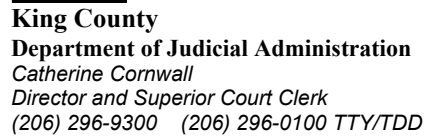


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## Faulty Document Notice

cc: Court File

**Clark Children & Family Justice Center**  
1211 East Alder Room 3015  
Seattle, WA 98122-5598

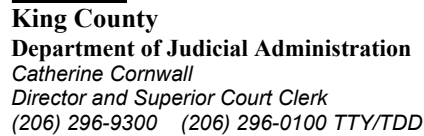


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Seattle, WA 98122-5598



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## Faulty Document Notice

cc: Court File

**Clark Children & Family Justice Center**  
1211 East Alder Room 3015  
Seattle, WA 98122-5598



**King County**  
**Department of Judicial Administration**  
*Catherine Cornwall*  
*Director and Superior Court Clerk*  
 (206) 296-9300 (206) 296-0100 TTY/TDD

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May 24, 2024

**Faulty Document Notice**

Case Caption: CAMPBELL VS LUCAS ET AL

Case No.: 23-2-25195-4 SEA, Sub: 245

In Re File Name: PART 2 Refile Campbells Reply to SJM NORGRENN Mot 8 05-22-24 Merged pages 27 - 62.pdf

Dear Filing Party:

Your document **Reply** submitted to the Clerk on **05/23/2024** for filing into the official court record has been rejected. The Clerk's Office cannot process the document for the following reason(s):

**The names on the case caption are missing. For additional information, you can review Local Court Rule (LCR) 84, LCR 10, and/or Court Rule (CR) 10. (Case Caption means the official title of the case. For example, (Commonwealth v. Smith, or Jane Jones and Sam Jones) (ID #1) NOT COMPLY WITH GR14 FORMATTING**

Please contact the Caseflow Section if you have questions or need additional information.

Sincerely,

Caseflow Seattle 206-477-6537

To view this letter in Spanish, Chinese, Russian, Somali, Amharic or Vietnamese, please visit <https://cdn.kingcounty.gov/-/media/king-county/depts/dja/cf-faulty/home>

cc: Court File

*King County Courthouse*  
 516 Third Avenue Room E609  
 Seattle, WA 98104-2386

*Maleng Regional Justice Center*  
 401 Fourth Avenue North Room 2C  
 Kent, WA 98032-4429

*Clark Children & Family Justice Center*  
 1211 East Alder Room 3015  
 Seattle, WA 98122-5598



## EXHIBIT E

Elizabeth Campbell <neighborhoodwarrior@gmail.com>

### Proposed Order 11-08-24 Hearing 23-2-25195-4 SEA Campbell v. Lucas Et Al

Elizabeth Campbell, MPA <neighborhoodwarrior@gmail.com>

Thu, Oct 31, 2024 at 1:51 PM

To: Court Holloway <holloway.court@kingcounty.gov>

Cc: "Barnhart, Kristen" <kbarnhart@corrchronin.com>, "Michael K. Rhodes" <mrhodes@mixsanders.com>, Nicholas Larson <nlarson@mpbf.com>, "Miguel E. Mendez-Pintado" <mmendezpintado@mpbf.com>, Elizabeth Campbell <neighborhoodwarrior@gmail.com>

Bcc: a1Lorelei Stevens <lorelei.stevens@gmail.com>

Dear Ms. Janes,

I am attaching a copy of the proposed order for the 11-08-24 hearing re my motion for an order to issue a SDT to Malin Jonsson-Borgstrom.

I have reviewed the rules for Department 44 again, "Department 44 is a **paperless** court and reviews materials requests receipt all working copies submitted via eWorking Copies. The Court does not accept working copies of pleadings by email absent prior authorization."

I am requesting prior authorization to submit the working copy of the motion for SDT via email.

Thank you in advance for your time and consideration.

Elizabeth Campbell, MPA



----- Previous message -----

From: Elizabeth Campbell, MPA <neighborhoodwarrior@gmail.com>

Date: Fri, Oct 11, 2024 at 12:39 PM

Subject: Proposed Order 10-15-24 Hearing 23-2-25195-4 SEA Campbell v. Lucas et al

To: Court Holloway <holloway.court@kingcounty.gov>

Cc: Michael K. Rhodes <mrhodes@mixsanders.com>, Nicholas Larson <nlarson@mpbf.com>, Barnhart, Kristen <kbarnhart@corrchronin.com>, Elizabeth Campbell <Neighborhoodwarrior@gmail.com>

Dear Ms. Janes,

I am attaching a copy of the proposed order for the hearing re my motion for an order of indigency.

I have reviewed the rules for Department 44 again, "Department 44 is a **paperless** court and reviews materials requests receipt all working copies submitted via eWorking Copies. The Court does not accept working copies of pleadings by email absent prior authorization."

I would like prior authorization to submit the working copy of the motion via email.

Thank you in advance for your time and consideration.

--

Elizabeth Campbell, MPA



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**2 attachments**



**NOH 23-2-25195-4 SEA Mot for SDT 11-8-2024.pdf**  
289K



**Plt SDT Malin J Borgstrom Prop Order .docx**  
137K

# EXHIBIT F

HONORABLE MARK A. LARRAÑAGA  
TRIAL DATE: 09/08/2025

## SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

ELIZABETH A. CAMPBELL, an  
individual,

Plaintiff,

v.

LARS CHRISTIAN MATTHIESEN, an  
individual, et al.,

Defendant.

and

ELIZABETH A. CAMPBELL, an  
individual,

Plaintiff,

v.

SHARON LUCAS, an individual, et al.,

Defendants.

and

ELIZABETH A. CAMPBELL, an  
individual,

Petitioner,

v.

SWEDISH CULTURAL CENTER d/b/a the  
SWEDISH CLUB, a Washington nonprofit

Case No.: 23-2-25128-8 SEA

LEAD CASE

Consolidated with

No. 23-2-25195-4 SEA

No. 24-2-09698-1 SEA

No. 24-2-11117-4 SEA

No. 24-2-14525-7 SEA

**ORDER GRANTING IN PART AND  
DENYING IN PART PLAINTIFF'S  
MOTION REQUESTING  
PRESERVATION OF JUDGE'S  
WORKING PAPERS FOR CASE NO. 23-2-  
25195-4**

1 preserving then assigned Judge Holloway’s working papers, notes, annotations, or other related  
2 documents related to Case No. 23-2-25195-4.<sup>1</sup> To this end, Petitioner speculates that the working  
3 copies “may contain . . . unique annotations or observations that are material to understanding the  
4 rationale behind the Court’s decisions.”<sup>2</sup>

5 Under GR 31.1(m), “chamber record” means any writing that is created or maintained by  
6 any judicial officer or chambers staff, and is maintained under chambers control, whether directly  
7 related to an official judicial proceeding, the management of the court, or other chambers activity.”  
8 Chamber records are not administrative records and are not subject to disclosure.<sup>3</sup> Further, courts  
9 have the inherent authority to control their records and proceedings, and decisions regarding access  
10 to or preservation of judicial records are generally left to the sound discretion of the trial court.<sup>4</sup>

11 To the extent the parties seek an order preserving any binder with hard copies of pleadings  
12 that were provided to Judge Holloway in connection with oral argument, neither party provides  
13 any evidence or argument that said hard copies are different than the documents made part of the  
14 record by way of e-filing.

15 The Court, having reviewed the motion, any response and reply thereto, as well as the court  
16 records and files, and being otherwise fully informed,

17 **NOW, THEREFORE, HEREBY ORDERS that Plaintiff’s Motion is DENIED.**

18 DATED this 21<sup>st</sup> day of April, 2025.

19  
20  
21  
22 Mark A. Larrañaga  
23 HONORABLE MARK A. LARRAÑAGA  
24

25 <sup>1</sup> Dkt. 124.

26 <sup>2</sup> *Id.*

<sup>3</sup> GR 31.1(m).

<sup>4</sup> See e.g., *Cowles Pub. Co. v. Murphy*, 96 Wn.2d 584, 588 (1981).

# EXHIBIT G

## 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

### DECLARATION OF ELIZABETH CAMPBELL IN SUPPORT OF DISCOVERY MANAGEMENT FRAMEWORK AND MEET-AND- CONFER PROCESS

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

1. I am the Plaintiff in this action, proceeding without counsel. I make this declaration in support of my structured discovery process and my efforts to meet and confer under CR 26(i) with defense counsel representing the sixteen named defendants in this matter.

2. On April 16, 2025, I served discovery requests, including interrogatories and requests for production, on all sixteen defendants. These requests were served by email and

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

ELIZABETH A. CAMPBELL  
3826 24<sup>TH</sup> AVE W  
SEATTLE, WA 98199

Plaintiff's Exhibits Page - 26  
206-760-8459  
NEIGHBORHOODWARRIOR@

1 included both PDF and Word versions. A true and correct copy of that transmittal is  
2 attached hereto as **Exhibit A**.

3 3. On April 25, 2025, I received an email from counsel for Defendant Matthiesen  
4 (Nicholas Larson), proposing a collective meet-and-confer conference regarding the  
5 “scope and number” of my discovery requests and my Second Amended Complaint. A  
6 true and correct copy of that email is attached hereto as **Exhibit B**.

7 4. That same day, I responded with a structured discovery management  
8 framework. I explained that, due to the number of defendants and the divergent factual  
9 and legal issues among them, I proposed a written exchange of objections followed by  
10 individual or group-specific conferral. A true and correct copy of that correspondence is  
11 attached as **Exhibit C**.

12 5. That evening, defense counsel Karen Kalzer separately emailed to decline  
13 permission for any recorded calls, under Washington’s two-party consent statute. A true  
14 and correct copy is attached as **Exhibit D**.

15 6. On April 28, 2025, Mr. Larson reiterated a request for a single collective call  
16 with all defense counsel and dismissed the proposal for group-specific or staged  
17 conferral. A true and correct copy is attached as **Exhibit E**.

18 7. On April 29, 2025, I provided a further written response reiterating my proposal,  
19 citing CR 26(i), proportionality under CR 26(b), and fairness to a self-represented party. I  
20 also noted that the defendants have filed four separate Answers, reflecting divergent  
21 defenses. A true and correct copy is attached as **Exhibit F**.

22 8. Later that same day, I transmitted discovery request summaries for Defendant  
23 Groups 1, 2, and 3, providing further clarity and specificity. A true and correct,  
24 representative copy of those transmittals including Defendant Group 2, Defendant  
25 Langdon Miller’s Discovery Summary are attached as **Exhibit G**.  
26

1 9. On May 1, 2025, defense counsel again rejected my proposed discovery  
2 framework and repeated the demand for a collective Rule 26 conference, stating that they  
3 would not agree to the preliminary written format or timelines I had proposed. A true and  
4 correct copy is attached as **Exhibit H**.

5 10. On this day, I am finalizing my reply letter to defense counsel which attaches  
6 this declaration and documents my compliance with all applicable discovery rules,  
7 particularly CR 26(i), CR 33, and CR 34. A true and correct copy of that letter is attached  
8 hereto as **Exhibit J**.

9 11. The summaries I provided, along with my structured correspondence, offer an  
10 informal but orderly framework for defense counsel to assert any specific objections or  
11 disputes regarding my discovery requests. This approach is designed to support clarity,  
12 efficiency, and compliance with CR 26(i), and to give defense counsel the opportunity to  
13 raise concerns in writing rather than immediately resorting to motion practice. My goal  
14 has been to create a transparent and collaborative pathway to resolve disagreements and  
15 avoid unnecessary burden on the Court.

16 12. Washington courts consistently emphasize that discovery is intended to be  
17 managed by the parties themselves, not by the judiciary, and that pre-motion conferral is  
18 required. As the Supreme Court stated in *Mayer v. Sto Industries*, “The discovery rules...  
19 contemplate that parties will make a good-faith effort to resolve discovery disputes  
20 without court involvement.” 156 Wn.2d 677, 684–85 (2006).

21 13. Further, the Washington Civil Discovery Deskbook (WSBA), § 7.4, confirms  
22 that ‘what constitutes a sufficient “meeting” under CR 26(i) will vary with the  
23 circumstances, but the rule does not mandate face-to-face or telephonic meetings. Where  
24 the parties have made meaningful efforts in writing to resolve disputes, courts have  
25 accepted that as sufficient.’  
26



**EXHIBIT G**  
**Elizabeth Campbell**  
<neighborhoodwarrior@gmail.com>

---

## **Defendant Group 2 Meet-and-Confer Request Re Plaintiff's Discovery Requests**

1 message

---

**Elizabeth Campbell, MPA**  
<neighborhoodwarrior@gmail.com>

Tue, Apr  
29, 2025  
at 5:14  
PM

To: Brad Bigos <bbigos@ohaganmeyer.com>, Alex Lopez  
<alopez@ohaganmeyer.com>

Cc: "Kalzer, Karen A." <kkalzer@helsell.com>, "Miguel E.  
Mendez-Pintado" <mmendezpintado@mpbf.com>,  
"Megan F. Starks" <mstarks@pattersonbuchanan.com>,  
"Sarah A. Tatistcheff" <SAT@pattersonbuchanan.com>,  
Nicholas Larson <nlarson@mpbf.com>, Elizabeth  
Campbell <Neighborhoodwarrior@gmail.com>  
Bcc: a1Lorelei Stevens <lorelei.stevens@gmail.com>

Dear Mr. Bigos,

I am committed to fulfilling CR 26(i)'s good-faith  
conferral requirement. I propose starting with written  
correspondence to ensure clarity and orderly case  
administration. This approach addresses your request

for my availability while prioritizing a structured process to resolve discovery matters efficiently and prevent undue delay.

Attached is a **Discovery Request Summary** for the Defendant Group 2's interrogatories and RFPs, detailing their relevance to claims in the Second Amended Complaint (SAC, Appendix A).

Please provide **specific, non-boilerplate objections or concerns** in writing by **May 7, 2025**, per CR 26(b)(1), CR 33(b)(4), and CR 34(b)(2)(C), identifying any requests you deem objectionable and the precise grounds therefor.

To promote orderly case administration and manage the logistical challenges of coordinating with multiple counsel as a pro se plaintiff, I am setting the following due dates for written responses from all defense counsel, reflecting the distinct roles of each defendant group:

- **Group 4 (Matthiesen, your client, counsel: Nicholas Larson, Miguel Mendez-Pintado):** Written response by **May 1, 2025**.
- **Group 1 (Leander, Hayes, counsel: Karen Kalzer):** Written response by **May 5, 2025**. (pending delivery of Discovery Request Summaries).
- **Group 2 (Swedish Club, Miller, Johansson, Lucas, Sund, counsel: Brad Bigos, Alex**

**Lopez**): Written response by **May 7, 2025** (pending delivery of Discovery Request Summaries).

- **Group 3 (Norgren, Alaimo, Albright, Emerson, Faino, Johansson, Odderson, Smith, Snyder, counsel: Megan Starks, Sarah Tatischeff)**: Written response by **May 9, 2025** (pending delivery of Discovery Request Summaries).

Upon receipt of your written response by **May 7, 2025**, I am available for an **individual telephonic meet-and-confer** focused solely on any Group 3 Defendant's requests on **May 14th or 15, 2025**, at a mutually agreeable time. Per RCW 9.73.030, I prefer to record any call for accuracy, though I am open to non-recorded options if preferred.

Given the complexity of this litigation — involving 16 defendants now represented across multiple distinct groups, with 56 causes of action, and a 383-page Second Amended Complaint — a meaningful meet-and-confer process must reflect the reality that the defendants' interests, defenses, and exposures are no longer aligned. **Notably, defendants have filed four separate Answers to the Second Amended Complaint, formally reflecting divergent factual and legal positions.** Discovery responses will necessarily vary accordingly.

Regarding your mention of the recently filed amended complaint, please clarify in writing which aspects you wish to discuss, and I will address them in our conferral process. I look forward to your specific written response by **May 7, 2025**, to ensure timely progress toward the **May 19, 2025**, discovery response deadline (CR 33(b)(2), CR 34(b)(2)(A)).

Sincerely,  
Elizabeth A. Campbell  
Plaintiff Pro Se  
3826 24th Ave W, Seattle, WA 98199  
206-769-8459  
[neighborhoodwarrior@gmail.com](mailto:neighborhoodwarrior@gmail.com)

--

Elizabeth Campbell, MPA



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### 5 attachments



**D Group 2 GSund Summary.pdf**  
107K



**D Group 2 Lucas Summary.pdf**  
118K