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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,

11 vs.

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

NO. 23-2-25128-8 SEA

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

24 TO: All Counsel of Record:

25 PLEASE TAKE NOTICE that on May 1, 2025, the undersigned Plaintiff, Elizabeth
26 Campbell, filed with the Clerk of the Court the attached Declaration of Elizabeth
Campbell in Support of Discovery Management and CR 26(i) Conferral Framework,
including Exhibits A through J.

\\
\\
\\

DATED May 1, 2025, at Seattle, Washington.

**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

Respectfully submitted,



Elizabeth A. Campbell, MPA

Plaintiff, Pro Se

3826 24th Ave W

Seattle, WA 98199

Tel/Text: 206-769-8459

Fax: 206-283-6300

neighborhoodwarrior@gmail.com

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20 K. JOHANSSON, ANNA FAINO and LANE
21 POWELL PC,

22 Defendants.

NO. 23-2-25128-8 SEA

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

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

25 1. I am the Plaintiff in this action, proceeding without counsel. I make this
26 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

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**.

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

1 I declare under penalty of perjury under the laws of the State of Washington that
2 the foregoing is true and correct.
3

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

5 Respectfully submitted,

6 
7

8 Elizabeth A. Campbell, MPA
9 Plaintiff, Pro Se
10 3826 24th Ave W
11 Seattle, WA 98199
12 Tel/Text: 206-769-8459
13 Fax: 206-283-6300
14 neighborhoodwarrior@gmail.com
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Exhibit Index – Declaration of Elizabeth Campbell

Exhibit A: 04-16-25 Plaintiff's Email Transmitting Discovery Requests to Defendants;
PDF & Word Copies

Exhibit B: 04-25-25 D Counsel 4, Larson's initial meet-and-confer request email

Exhibit C: 04-25-25 Plaintiff's structured Response w/ discovery mgmt. framework

Exhibit D: 04-25-25 D Counsel 1, Kalzer's declination recorded call

Exhibit E: 04-28-25 D Counsel 4, Larson's follow-up email rejecting Plaintiff's
discovery mgmt. framework

Exhibit F: 04-29-25 Plaintiff's response offering structured Response w/ further
explanation

Exhibit G: 04-29-25 Plaintiff's email transmitting framework summaries for D Groups 1,
2, 3; includes representative summaries - D Group 2 - Summaries

Exhibit H: 04-30-25 Counsel 4, Larson's Follow-up rejecting Plaintiff's discovery
framework

Exhibit J: 04-30-25 Plaintiff's final response offering a limited procedural call



EXHIBIT A

Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

2 messages

Elizabeth Campbell, MPA

<neighborhoodwarrior@gmail.com>

Wed, Apr
16, 2025
at 8:15 PM

To: Alex Lopez <alopez@ohaganmeyer.com>, Brad Bigos
<bbigos@ohaganmeyer.com>, "Kalzer, Karen A."
<kkalzer@helsell.com>, "Megan F. Starks"
<mstarks@pattersonbuchanan.com>, "Miguel E.
Mendez-Pintado" <mmendezpintado@mpbf.com>,
Nicholas Larson <nlarson@mpbf.com>, "Sarah A.
Tatistcheff" <SAT@pattersonbuchanan.com>

Cc: Elizabeth Campbell

<Neighborhoodwarrior@gmail.com>

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

April 16, 2025

VIA EMAIL

Karen Kalzer

Counsel for Kristine Leander and Toene Hayes

Brad Bigos and Alex Lopez
Counsel for The Swedish Club, Langdon Miller, Kris
Johansson, Sharon Lucas, and Gary Sund

Megan Starks and Sarah Tatischeff
Counsel for Sarah Alaimo, Shama Albright, Mary
Emerson, Anna Faino, Martin Johansson, Ib
Odderson, Molly Olson Smith, and Neil Snyder

Nicholas Larson and Miguel Mendez-Pintado
Counsel for Lars Matthiesen

Re: King Co. Superior Court Lead Case No. 23-2-
25128-8

Elizabeth Campbell v. Matthiesen et al

Dear Counsel,

Enclosed please find Plaintiff's First Set of
Interrogatories and Requests for Production directed
to each of your respective clients as named above.
Pursuant to Washington Superior Court Civil Rules
(CR) 33 and 34, please provide responses to these
discovery requests within thirty (30) days of receipt,
unless otherwise stipulated or ordered by the court.

Responses should be served electronically to our
office at [Plaintiff's Counsel Email Address] and mailed
to 3826 24th Ave W, Seattle, WA 98199.

Should you require an extension or have any questions regarding the enclosed discovery requests, please contact me directly to discuss.

I look forward to your clients' timely responses.

Sincerely,
Elizabeth Campbell
Plaintiff, Pro Se

Attachments:
Plaintiff's First Set of Interrogatories and Requests for
Production to:
Kristine Leander and Toene Hayes

The Swedish Club, Langdon Miller, Kris Johansson,
Sharon Lucas, and Gary Sund

Sarah Alaimo, Shama Albright, Mary Emerson, Anna
Faino, Martin Johansson, Ib Odderson, Molly Olson
Smith, and Neil Snyder










Lars Matthiesen

--

Elizabeth Campbell, MPA



16 attachments

-  **KJohan ITRGs RFPs 04-16-25 Final.pdf**
292K
-  **GSund ITRGs RFPs 04-16-25 Final.pdf**
281K
-  **AFaino ITRGs RFPs 04-16-25 Final.pdf**
259K
-  **IOdd ITRGs RFPs 04-16-25 Final.pdf**
262K
-  **KLean ITRGs RFPs 04-16-25 Final.pdf**
418K
-  **MAOS ITRGs RFPs 04-16-25 Final.pdf**
282K
-  **LMILL ITRGs RFPs 04-16-25 Final.pdf**
303K
-  **MEMER Interrogatories April 16 2025 Final.pdf**
295K
-  **LMATT ITRGs RFPs 04-16-25 Final.pdf**
317K
-  **MJOHAN Interrogatories April 16 2025 Final.pdf**
263K

-  **NSNYD ITRGs RFPs 04-16-25 Final.pdf**
308K
 -  **SALAI ITRGs RFPs 04-16-25 Final.pdf**
299K
 -  **SHARM ITRGs RFPs 04-16-25 Final.pdf**
293K
 -  **SLUC ITRGs RFPs 04-16-25 Final.pdf**
312K
 -  **SWEDC ITRGs RFPs 04-16-25 Final.pdf**
340K
 -  **THAYES ITRGs RFPs 04-16-25 Final.pdf**
335K
-



Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

Elizabeth Campbell, MPA
<neighborhoodwarrior@gmail.com>

Wed, Apr
16, 2025
at 8:18 PM

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

Opposing Counsel, attached are the Word copies of the discovery materials.

--
Elizabeth Campbell, MPA



16 attachments



GSund ITRGs RFPs 04-16-25 Final.docx
116K



KJohan ITRGs RFPs 04-16-25 Final.docx
118K



AFaino ITRGs RFPs 04-16-25 Final.docx
108K














-  **IOdd ITRGs RFPs 04-16-25 Final.docx**
112K
-  **KLean ITRGs RFPs 04-16-25 Final.docx**
121K
-  **LMILL ITRGs RFPs 04-16-25 Final.docx**
118K
-  **MAOS ITRGs RFPs 04-16-25 Final.docx**
115K
-  **MJOHAN Interrogatories April 16 2025 Final.docx**
112K
-  **LMATT ITRGs RFPs 04-16-25 Final.docx**
124K
-  **MEMER Interrogatories April 16 2025 Final.docx**
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119K
-  **SALAI ITRGs RFPs 04-16-25 Final.docx**
117K
-  **SHARM ITRGs RFPs 04-16-25 Final.docx**
117K
-  **SWEDC ITRGs RFPs 04-16-25 Final.docx**
131K
-  **THAYES ITRGs RFPs 04-16-25 Final.docx**
126K



EXHIBIT B

Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

1 message

Nicholas Larson <NLarson@mpbf.com>

Fri, Apr 25, 2025 at
11:51 AM

To: "Elizabeth Campbell, MPA"

<neighborhoodwarrior@gmail.com>, 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>

Ms. Campbell,

Thank you for the email. Upon initial review of your discovery requests, the DEFENSE Counsel (collectively) would like to meet and confer with you about the scope and number of your requests. During that call we would also like to meet and confer with you about your recently filed amended complaint. Please let us know your availability for a meet and confer call next week.

Thanks,

Nicholas Larson

Shareholder

Murphy, Pearson, Bradley & Feeney, P.C.

Seattle: 206.219.2008 | San Francisco: 415.788.1900

[LinkedIn](#) | [Bio Link](#) | www.mpbef.com



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EXHIBIT C

Elizabeth Campbell

<neighborhoodwarrior@gmail.com>

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

1 message

Elizabeth Campbell, MPA

<neighborhoodwarrior@gmail.com>

Fri, Apr 25,
2025 at 5:26
PM

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>

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

Subject: Meet-and-Confer Request for Matthiesen Discovery Requests

Dear Mr. Larson,

Thank you for your April 25, 2025, email regarding the discovery requests served on Defendant Lars Matthiesen on April 16, 2025 (33 interrogatories, 35 RFPs). As a pro se plaintiff managing four defendant groups with distinct interests, 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 Matthiesen's interrogatories and RFPs, detailing their relevance to claims in the Second Amended Complaint (SAC, Appendix A, pages 372–382, Causes 8, 9, 10, 11, 12, 45) and Section V paragraphs (¶¶ 5.602–5.658). Please provide **specific, non-boilerplate objections or concerns** in writing by **May 1, 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 1, 2025, I am available for an **individual telephonic meet-and-confer** focused solely on Matthiesen's requests on **May 7 or 8, 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 addressing 17 defendants across four groups, I respectfully request individual conferrals for each defendant group rather than a collective call, as a group call would hinder effective resolution of specific discovery issues and overburden a pro se plaintiff.

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 1, 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

EACampbell



EXHIBIT D

Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

2 messages

Kalzer, Karen A. <kkalzer@helsell.com>

Fri, Apr 25, 2025 at
6:23 PM

To: "neighborhoodwarrior@gmail.com"

<neighborhoodwarrior@gmail.com>, Nicholas Larson
<NLarson@mpbf.com>

Cc: Alex Lopez <alopez@ohaganmeyer.com>, Brad Bigos
<bbigos@ohaganmeyer.com>, "Megan F. Starks"

<mstarks@pattersonbuchanan.com>, Miguel Mendez-Pintado
<mmendezpintado@mpbf.com>, "Sarah A. Tatistcheff"
<SAT@pattersonbuchanan.com>

Let me be clear. I do not agree to recording in the two party consent state.

Karen A. Kalzer | Helsell Fetterman LLP

800 Fifth Ave, Suite 3200

Direct: (206) 689-2125

Fax: (206) 340-0902

Email: kkalzer@helsell.com



EXHIBIT E

Elizabeth Campbell

<neighborhoodwarrior@gmail.com>

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

1 message

Nicholas Larson <NLarson@mpbf.com>

Mon, Apr 28, 2025 at
1:46 PM

To: "Elizabeth Campbell, MPA" <neighborhoodwarrior@gmail.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>

Ms. Campbell,

Thank you for your email and proposal. We look forward to working with you to resolve discovery issues in these matters. I apologize if my prior email was not clearly communicated. Therefore, I am going to rephrase and reiterate the request.

On behalf of ALL Defense Counsel in these matters for ALL Defendants, I am writing to request an initial, general meet and confer call/zoom to discuss the aggregate number of discovery

requests as well as their scope. During this call ALL Defense Counsel would like to meet and confer with you at one time. In addition, ALL Defense Counsel would also like to meet and confer with you as well about your Second Amended Complaint and the recent additions thereto. Please let us know your earliest availability to meet and confer with ALL Counsel in this matter.

To be clear, I am not seeking, nor is any Counsel in this matter seeking, to meet individually with you about discovery issues – at this time (that may happen in the future).

Again, we look forward to meeting with you and working with you to get through these discovery issues.

Thanks,

Nicholas Larson

Shareholder

Murphy, Pearson, Bradley & Feeney, P.C.

Seattle: 206.219.2008 | San Francisco: 415.788.1900



EXHIBIT F

Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

1 message

Elizabeth Campbell, MPA
<neighborhoodwarrior@gmail.com>

Tue, Apr 29,
2025 at 4:13
PM

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>

Subject: Meet-and-Confer Framework for Discovery Responses
and Second Amended Complaint

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 already
provided you with a detailed Discovery Request Summary for Mr.
Matthiesen, expressly correlating each interrogatory and request
for production to the specific causes of action, complaint

paragraphs, and relevant factual events in the Second Amended Complaint.

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, each defendant group has filed a separate Answer to the Second Amended Complaint, four Answers formally reflecting divergent factual and legal positions.** Discovery responses will necessarily vary accordingly.

I respectfully maintain that an initial written exchange of objections, concerns, or positions regarding my discovery requests is essential. This approach:

- Provides a focused basis for conferral discussions;
- Prevents undue confusion or prejudice arising from a mass, collective conference with numerous counsel representing divergent parties;
- Comports with CR 26(b)'s proportionality principles and CR 1's mandate for just, speedy, and inexpensive proceedings;
- Protects the fairness of the process given my status as a self-represented party managing complex litigation against multiple represented defendants;
- Reduces the likelihood of gamesmanship where generalized objections could be weaponized post-conference to seek protective orders.

To be clear, I interpret defense counsel's stated preference not to meet individually with me "at this time" as a strategic effort to engineer a procedural record for potential motion practice without first meaningfully engaging on the merits of the discovery requests. I cannot agree to a collective meet-and-confer that

would create confusion, undermine the clarity of the issues to be addressed, or potentially prejudice my ability to fairly and efficiently resolve discovery disputes.

Accordingly, I respectfully reiterate the following:

- Written objections and responses should be provided by each defense group according to the schedule set forth in my prior communications, beginning with Group 4 (Matthiesen) by May 1, 2025;
- I am prepared to schedule individual or group-specific telephonic meet-and-confers promptly thereafter if disputes remain;
- If defendants have specific concerns regarding the motion for a Third Amended Complaint, that may or may not impact discovery, I request that those concerns also be raised in writing.

This structure ensures a genuine good-faith conferral as required under CR 26(i), promotes judicial economy, and prevents unnecessary disputes in view of the May 19, 2025, discovery response deadline.

Please confirm whether you will proceed on this basis. I remain committed to working toward a fair and efficient resolution of these discovery matters.

Sincerely,
Elizabeth Campbell

Plaintiff, Pro Se
neighborhoodwarrior@gmail.com



EXHIBIT G
Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

Defendant Group 1 Meet-and-Confer Request Re Plaintiff's Discovery Requests

Elizabeth Campbell, MPA
<neighborhoodwarrior@gmail.com>

Tue, Apr
29, 2025
at 5:14
PM

To: "Kalzer, Karen A." <kkalzer@helsell.com>
Cc: Brad Bigos <bbigos@ohaganmeyer.com>, Alex
Lopez <alopez@ohaganmeyer.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 Ms. Kalzer,

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 1's, Kristine Leander's interrogatories and RFPs, detailing their relevance to claims in the Second Amended Complaint. I am withdrawing Toene Hayes' discovery request and will provide you with an updated copy – I found a major "typo" in it. I'm sorry for any inconvenience that may cause.

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 7, 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 1 Defendants' 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, however I understand you oppose that pursuant to your April 25th.

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

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Elizabeth Campbell, MPA



D Group 1 Leander Summary.pdf

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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

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Elizabeth Campbell, MPA



5 attachments



D Group 2 GSund Summary.pdf
107K



D Group 2 Lucas Summary.pdf
118K



D Group 2 - KJohan Summary.pdf

119K



D Group 2 Swedish Club Summary.pdf

159K



D Group 2 LMiller Summary.pdf

145K

Interrogatory/RFP and Legal Foundation	Related Causes of Action	Related Complaint Paragraphs	Key Individuals and Activities/Events
<p>Interrogatory No. 1: Identify the person(s) who authored, or whom you have knowledge of as having authored, the Letter, including their contact information, and the source of their knowledge, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) permits broad discovery. CR 33 requires complete answers. Seeks evidence of Letter's authorship to probe defendants' knowledge or involvement in Leander's defamatory/outrageous conduct (gossip, scheme), potentially turning defendants against each other.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation/harassment, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander, denunciation), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p>	<p>Langdon Miller, Elizabeth Campbell, Kristine Leander; July 2024 (Letter receipt)</p>
<p>Interrogatory No. 2: Describe your involvement, if any, in the authoring or sending of the Letter, including any communications or actions taken, from December 1, 2024, to present. Legal Foundation: CR 26(b)(1) supports discovery of defendants' role in Letter's creation/dissemination, probing complicity in Leander's defamatory/outrageous actions to drive wedge. CR 33 mandates detailed answers.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation/harassment, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p>	<p>Langdon Miller, Elizabeth Campbell; December 2024 (Letter drafting)</p>
<p>Interrogatory No. 3: Describe any actions or plans by Kristine Leander to terminate Elizabeth Campbell's membership with the Swedish Club, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) allows discovery of interference facts. CR 33 requires specificity. Relevant to Letter's exclusion claim, probing defendants' knowledge or similar actions.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting</p>

<p>Interrogatory No. 4: Identify all instances of gossip or negative statements about Elizabeth Campbell by Kristine Leander or others, including dates, locations, and persons involved, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of defamatory/outrageous discussions. CR 33 requires specificity. Relevant to Letter's gossip allegations, probing defendants' knowledge or parallel conduct to expose complicity or conflicts.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.602–5.658 (Hayes' conduct), pages 327–329, 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2023 (club discussions)</p>
<p>Interrogatory No. 5: State your knowledge of the December 17, 2021, argument between Elizabeth Campbell and Lars Matthiesen, including any communications or observations, from January 1, 2021, to present. Legal Foundation: CR 26(b)(1) permits discovery of incident details. CR 33 mandates detailed answers. Relevant to Letter's public argument claim, probing defendants' awareness or role.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander's role, including 5.775), ¶¶ 5.101–5.145 (board aggression), pages 332–335</p>	<p>Langdon Miller, Elizabeth Campbell, Lars Matthiesen, Kristine Leander; December 17, 2021 argument</p>
<p>Interrogatory No. 6: Describe any actions you took or were aware of that contributed to Elizabeth Campbell's employment termination from the Swedish Club, from August 1, 2020, to present. Legal Foundation: CR 26(b)(1) allows discovery of termination facts. CR 33 requires specificity. Relevant to Letter's termination claim, probing defendants' involvement or knowledge of Leander's scheme.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.602–5.658 (Hayes), ¶¶ 5.659–5.776 (Leander's termination, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 327–329, 334, 357–361</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; January 18, 2022 staff meeting</p>

<p>Interrogatory No. 7: Identify all decisions, discussions, or actions leading to Elizabeth Campbell's exclusion from Swedish Club membership, including dates and persons involved, from September 1, 2020, to present. Legal Foundation: CR 26(b)(1) supports discovery of exclusion facts. CR 33 mandates detailed answers. Relevant to Letter's exclusion claim, probing defendants' role or knowledge.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander's exclusion, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Sharon Lucas; November 2, 2022 board meeting</p>
<p>Interrogatory No. 8: Identify all instances of membership terminations or exclusions of other Swedish Club members, including reasons and dates, from June 1, 2019, to present. Legal Foundation: CR 26(b)(1) allows discovery of exclusion patterns. CR 33 requires specificity. Relevant to public accommodation violations, probing club practices.</p>	<p>53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 364, 366</p>	<p>Langdon Miller, Kristine Leander, Swedish Club; June 2019–2025 (membership terminations)</p>
<p>Interrogatory No. 9: Describe any coordinated efforts or communications among defendants or others to terminate Elizabeth Campbell's employment or exclude her from membership, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) permits discovery of schemes. CR 33 requires detailed answers. Relevant to Letter's scheme allegation, probing defendants' complicity or conflicts.</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander's scheme, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 333–334, 357–361, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; August 2020–2023 (scheme)</p>

<p>Interrogatory No. 10: Identify all witnesses to events described in the Letter, including their contact information and the specific events they witnessed, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) allows discovery of witness identities. CR 33 requires complete answers. Relevant to Letter's gossip, argument, termination, and exclusion claims, probing defendants' knowledge or involvement to drive wedge.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.18–5.52 (membership), ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.178–5.194 (public accommodation), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 332–335, 357–361, 364, 366; Letter not in SAC</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Lars Matthiesen; August 2020–2025 (club events)</p>
<p>Interrogatory No. 11: State the date of formation of the Swedish Club's governance and bylaws committee. Legal Foundation: CR 26(b)(1) supports discovery of governance actions. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; March 9, 2023 (membership termination)</p>
<p>Interrogatory No. 12: Describe the purpose and objectives of the governance and bylaws committee, including its role in membership policies. Legal Foundation: CR 26(b)(1) allows discovery of committee activities. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>

<p>Interrogatory No. 13: Identify all members of the governance and bylaws committee and their service dates, from formation to present. Legal Foundation: CR 26(b)(1) supports discovery of committee composition. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>Interrogatory No. 14: List all governance and bylaws committee meetings, including dates, topics discussed, and actions taken, from formation to present. Legal Foundation: CR 26(b)(1) permits discovery of meeting details. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee meetings (ongoing)</p>
<p>Interrogatory No. 15: Identify all communications between the governance and bylaws committee and Langdon Miller, including dates and content, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) supports discovery of committee communications. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; July 2024–2025 (communications)</p>

<p>Interrogatory No. 16: Identify all communications between the governance and bylaws committee and other Swedish Club board members, including dates and content, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) supports discovery of board communications. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kris Johansson, Gary Sund, Sharon Lucas; July 2024–2025 (communications)</p>
<p>Interrogatory No. 17: Identify all communications between the governance and bylaws committee and the Swedish Club executive director, including dates and content, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) supports discovery of executive communications. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell; July 2024–2025 (communications)</p>
<p>Interrogatory No. 18: Describe all proposed bylaw amendments by the governance and bylaws committee, including content and dates proposed, from formation to present. Legal Foundation: CR 26(b)(1) allows discovery of bylaw changes. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p>Interrogatory No. 19: Describe all proposed member conduct standards by the governance and bylaws committee, including content and dates proposed, from formation to present. Legal Foundation: CR 26(b)(1) supports discovery of conduct policies. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>Interrogatory No. 20: Identify all experts or legal advisors consulted by the governance and bylaws committee, including their contact information and dates of consultation, from formation to present. Legal Foundation: CR 26(b)(1) permits discovery of non-privileged advisor details. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>Interrogatory No. 21: Describe all committee discussions regarding membership terminations, including Elizabeth Campbell's, with specific reference to dates, reasons, and outcomes, from March 9, 2023, to present. Legal Foundation: CR 26(b)(1) supports discovery of termination discussions. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; March 9, 2023 termination</p>

<p>Interrogatory No. 22: Explain the reasons for the formation of the governance and bylaws committee, including any specific events or issues prompting its creation. Legal Foundation: CR 26(b)(1) allows discovery of committee origins. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>
<p>Interrogatory No. 23: Describe any retroactive bylaw changes proposed or implemented to justify past actions by the Swedish Club, including dates and content, from formation to present. Legal Foundation: CR 26(b)(1) supports discovery of retroactive policies. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>Interrogatory No. 24: Describe any member input or feedback solicited or received by the governance and bylaws committee on bylaw or conduct changes, including dates and content, from formation to present. Legal Foundation: CR 26(b)(1) permits discovery of member feedback. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club members; Committee activities (ongoing)</p>

<p>Interrogatory No. 25: Describe all proposed termination procedures for Swedish Club members developed by the governance and bylaws committee, including content and dates, from formation to present. Legal Foundation: CR 26(b)(1) supports discovery of termination policies. CR 33 mandates detailed answers. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>Interrogatory No. 26: Describe any legal opinions or advice received by the governance and bylaws committee regarding compliance with RCW 24.03A, including dates and content, from formation to present. Legal Foundation: CR 26(b)(1) permits discovery of non-privileged legal opinions. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>Interrogatory No. 27: Identify the “former leader” referenced in the February 2025 Board President’s Letter, including their contact information and role at the Swedish Club. Legal Foundation: CR 26(b)(1) supports discovery of defamatory allegations. CR 33 requires specificity. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>

<p>Interrogatory No. 28: List all Swedish Club board members from January 1, 2022, to present, including their names, contact information, and reasons for departure, if applicable. Legal Foundation: CR 26(b)(1) permits discovery of board composition. CR 33 requires specificity. Relevant to membership interference and discrimination.</p>	<p>16: Tortious Interference with Contract-Membership, 39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.53–5.100 (board ethics), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 353–364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; January 2022–2025 (board changes)</p>
<p>Interrogatory No. 29: Identify all former Swedish Club members or employees who filed lawsuits or complaints against the Swedish Club, including case details, from January 1, 2022, to present. Legal Foundation: CR 26(b)(1) supports discovery of related disputes. CR 33 mandates detailed answers. Relevant to workplace harassment and discrimination.</p>	<p>45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 39–41, 43–44, 47, 50, 52–54: Discrimination, Retaliation, Public Accommodation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2022–2025 (lawsuits)</p>
<p>Interrogatory No. 30: Confirm whether the “former leader” in the February 2025 Board President’s Letter is a defendant in this case, and if so, identify them. Legal Foundation: CR 26(b)(1) supports discovery of defamatory identities. CR 33 requires specificity. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>

<p>Interrogatory No. 31: Describe Langdon Miller's role in the defense of this lawsuit, including any communications or actions taken, from January 1, 2023, to present. Legal Foundation: CR 26(b)(1) permits discovery of defense involvement. CR 33 mandates detailed answers. Relevant to multiple COAs involving Miller's board actions.</p>	<p>39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2023–2025 (lawsuit defense)</p>
<p>Interrogatory No. 32: Explain how this lawsuit influenced the formation or activities of the governance and bylaws committee, including specific events or decisions, from January 1, 2023, to present. Legal Foundation: CR 26(b)(1) supports discovery of committee motives. CR 33 requires specificity. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; January 2023–2025 (committee formation)</p>
<p>RFP No. 1: Produce all documents related to the creation, drafting, or sending of the Letter, from December 1, 2024, to present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of relevant documents. Relevant to Leander's defamatory/outrageous actions, probing defendants' involvement to drive wedge.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), pages 332–335; Letter not in SAC, tied to Leander's gossip (¶¶ 5.659–5.670)</p>	<p>Langdon Miller, Elizabeth Campbell; December 2024 (Letter creation)</p>

<p>RFP No. 2: Produce all communications by Kristine Leander mentioning Elizabeth Campbell, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of interference documents. Relevant to interference and workplace harassment, probing defendants' knowledge.</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander's actions, including 5.775), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.785–5.864 (Sund/Leander), pages 333–334, 357–361, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell; August 2020–2025 (communications)</p>
<p>RFP No. 3: Produce all documents reflecting gossip or negative statements about Elizabeth Campbell by Kristine Leander or others, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to Letter's gossip allegations, probing defendants' complicity or conflicts.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED), 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 332–335, 357–361; Exhibit P-7 (page 467)</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; August 2020–2025 (gossip records)</p>
<p>RFP No. 4: Produce all records related to the December 17, 2021, argument between Elizabeth Campbell and Lars Matthiesen, from December 17, 2021, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of incident documents. Relevant to Letter's public argument claim.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.891–5.898 (Matthiesen, argument), ¶¶ 5.659–5.776 (Leander's role, including 5.775), ¶¶ 5.101–5.145 (board aggression), pages 332–335</p>	<p>Langdon Miller, Elizabeth Campbell, Lars Matthiesen; December 17, 2021 argument</p>

<p>RFP No. 5: Produce all records related to Elizabeth Campbell's employment termination from the Swedish Club, from March 1, 2021, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of termination documents. Relevant to Letter's termination claim, probing defendants' role.</p>	<p>17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), ¶¶ 5.602–5.658 (Hayes), ¶¶ 5.659–5.776 (Leander's termination, including 5.775), pages 327–329, 334, 357–361</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sarah Alaimo; March 2021–2025 (termination records)</p>
<p>RFP No. 6: Produce all records related to Elizabeth Campbell's membership exclusion from the Swedish Club, from August 15, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of exclusion documents. Relevant to Letter's exclusion claim, probing defendants' involvement.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander's exclusion, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Sharon Lucas; August 2020–2025 (exclusion records)</p>
<p>RFP No. 7: Produce all documents evidencing any scheme or plan to terminate Elizabeth Campbell's employment or exclude her from membership, from December 1, 2021, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of scheme documents. Relevant to Letter's scheme allegation, probing defendants' complicity.</p>	<p>16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander's scheme, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 333–334, 357–361, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell, Toene Hayes, Sharon Lucas; December 2021–2025 (scheme records)</p>

<p>RFP No. 8: Produce all communications between defendants discussing Elizabeth Campbell or the claims in this lawsuit, from October 1, 2020, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of coordinated communications. Relevant to multiple COAs, probing conflicts.</p>	<p>15: Defamation, 16: Tortious Interference with Contract-Membership, 17: Tortious Interference with Employment Expectancy, 45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 50: SMC 14.04 Discrimination/Retaliation, 39–41, 43–44, 47, 52–54: Discrimination, Retaliation, Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), ¶¶ 5.602–5.658 (Hayes), pages 327–329, 332–364, 366</p>	<p>Langdon Miller, Kristine Leander, Sharon Lucas, Kris Johansson; October 2020–2025 (communications)</p>
<p>RFP No. 9: Produce all documents related to the formation of the Swedish Club's governance and bylaws committee, including meeting minutes and communications, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of committee records. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>
<p>RFP No. 10: Produce all meeting minutes and agendas of the governance and bylaws committee, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 permit production of meeting records. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee meetings (ongoing)</p>

<p>RFP No. 11: Produce all communications between governance and bylaws committee members, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of committee communications. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; July 2024–2025 (communications)</p>
<p>RFP No. 12: Produce all communications between the governance and bylaws committee and the Swedish Club board, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of board communications. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Kris Johansson, Gary Sund; July 2024–2025 (communications)</p>
<p>RFP No. 13: Produce all communications between the governance and bylaws committee and the Swedish Club executive director, from July 1, 2024, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of executive communications. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.101–5.145 (board actions), pages 333, 364, 366</p>	<p>Langdon Miller, Kristine Leander, Elizabeth Campbell; July 2024–2025 (communications)</p>

<p>RFP No. 14: Produce all documents reflecting proposed bylaw amendments by the governance and bylaws committee, from formation to present.</p> <p>Legal Foundation: CR 26(b)(1) and CR 34 permit production of bylaw documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>RFP No. 15: Produce all documents reflecting proposed member conduct standards by the governance and bylaws committee, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of conduct policies. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>RFP No. 16: Produce all communications between the governance and bylaws committee and any experts or legal advisors, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of non-privileged advisor documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p>RFP No. 17: Produce all records of governance and bylaws committee discussions regarding membership terminations, including Elizabeth Campbell's, from March 9, 2023, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of termination records. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.659–5.776 (Leander, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; March 9, 2023 termination</p>
<p>RFP No. 18: Produce all documents explaining the reasons for the formation of the governance and bylaws committee, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of committee origin documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee formation (date unspecified)</p>
<p>RFP No. 19: Produce all documents reflecting retroactive bylaw changes proposed or implemented by the governance and bylaws committee, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of retroactive policy documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p>RFP No. 20: Produce all documents reflecting member feedback on bylaw or conduct changes solicited or received by the governance and bylaws committee, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of feedback documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club members; Committee activities (ongoing)</p>
<p>RFP No. 21: Produce all documents reflecting proposed termination procedures for Swedish Club members developed by the governance and bylaws committee, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of termination policy documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.101–5.145 (board aggression), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>
<p>RFP No. 22: Produce all legal opinions or advice received by the governance and bylaws committee regarding compliance with RCW 24.03A, from formation to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of non-privileged legal documents. Relevant to membership interference.</p>	<p>16: Tortious Interference with Contract-Membership, 53: Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.13–5.17 (bylaws), ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.67–5.90 (elections), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; Committee activities (ongoing)</p>

<p>RFP No. 23: Produce the February 2025 Board President's Letter and all related documents, including drafts and communications, from January 1, 2025, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander's defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>
<p>RFP No. 24: Produce all records of Swedish Club board members, including names, contact information, and departure reasons, from January 1, 2022, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of board records. Relevant to membership interference and discrimination.</p>	<p>16: Tortious Interference with Contract-Membership, 39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation, 56: Breach of Contract - Membership</p>	<p>SAC ¶¶ 5.18–5.52 (membership policies), ¶¶ 5.53–5.100 (board ethics), ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 333, 353–364, 366</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; January 2022–2025 (board changes)</p>
<p>RFP No. 25: Produce all records of lawsuits or complaints filed by former Swedish Club members or employees against the Swedish Club, from January 1, 2022, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of dispute records. Relevant to workplace harassment and discrimination.</p>	<p>45: Hostile Work Environment (Title VII), 46: Hostile Work Environment (WLAD), 39–41, 43–44, 47, 50, 52–54: Discrimination, Retaliation, Public Accommodation</p>	<p>SAC ¶¶ 5.174–5.177 (employment), ¶¶ 5.481–5.512 (hostile workplace), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2022–2025 (lawsuits)</p>

<p>RFP No. 26: Produce all documents identifying the “former leader” in the February 2025 Board President’s Letter, including communications and drafts, from January 1, 2025, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of defamatory documents. Relevant to defamation and outrage.</p>	<p>15: Defamation, 18: Tort of Outrage (IIED), 19: Tort of Outrage (NIED)</p>	<p>SAC ¶¶ 5.659–5.776 (Leander’s defamation, including 5.775), ¶¶ 5.785–5.864 (Sund/Leander), pages 332–335; February 2025 Letter</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club board; February 2025 (Letter)</p>
<p>RFP No. 27: Produce all records of Langdon Miller’s role in the defense of this lawsuit, including communications and actions taken, from January 1, 2023, to present. Legal Foundation: CR 26(b)(1) and CR 34 support production of defense records. Relevant to multiple COAs involving Miller’s board actions.</p>	<p>39–41, 43–44, 45–47, 50, 52–54: Discrimination, Retaliation, Hostile Work Environment, Public Accommodation</p>	<p>SAC ¶¶ 5.101–5.145 (board actions), ¶¶ 5.785–5.864 (Sund/Leander), pages 353–364</p>	<p>Langdon Miller, Elizabeth Campbell, Swedish Club; January 2023–2025 (lawsuit defense)</p>



EXHIBIT G
Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

Defendant Group 3 Meet-and-Confer Request Re Plaintiff's Discovery Requests

1 message

Elizabeth Campbell, MPA
<neighborhoodwarrior@gmail.com>

Tue, Apr
29, 2025
at 5:15
PM

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

Dear Ms. Starks,

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 3'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 9, 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 9, 2025**, I am available for an **individual telephonic meet-and-confer** focused solely on any Group 3 Defendant's requests on **May 15th or 16, 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 9, 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

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Elizabeth Campbell, MPA



9 attachments



D Group 3 Anna Faino Summary.pdf
98K



D Group 3 I Odderson Summary.pdf
110K

-  **D group 3 M Emerson Summary.pdf**
134K
-  **D Group 3 M Smith.pdf**
106K
-  **D Group 3 M Johansson Summary.pdf**
118K
-  **D Group 3 Neil Snyder Summary.pdf**
133K
-  **D Group 3 S Albright Summary.pdf**
101K
-  **D Group 3 S Alaimo.pdf**
117K
-  **Def Group 3 Summaries.xlsx**
61K



EXHIBIT H

Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

1 message

Nicholas Larson <NLarson@mpbf.com>

Wed, Apr 30, 2025 at
12:41 PM

To: "Elizabeth Campbell, MPA" <neighborhoodwarrior@gmail.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>

Ms. Campbell,

Thank you for your email. We do not agree and can not agree to the characterizations, framework, and arbitrary deadlines set forth in your email below. All of the counsel for the Defendants that are listed in the Campbell v. Lucas (23-2-25195-4) matter are requesting a Rule 26 conference with you. If your position is that you will not agree to a meet and confer under Rule 26 with Defense Counsel for the Defendants named in your Second Amended Complaint, please confirm that position in response to this email. Again, the operative Complaint drafted by Plaintiff lists the Defendants that want to meet and confer with you, in other words, Plaintiff is the one that chose to put those Defendants into

the same Complaint. For a variety of reasons, including efficiency and others, it is more than appropriate and important for the Plaintiff and Defense Counsel to meet and confer on this matter collectively. We look forward to your prompt response.

Thanks,

Nicholas Larson

Shareholder

Murphy, Pearson, Bradley & Feeney, P.C.

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EXHIBIT J

May 1, 2025

Via Email

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 be considered, and the refusal to put anything in writing has all the hallmarks of a defense, strategic effort to engineer a 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.

This structured approach 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 this happens.

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 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 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
3826 24th Ave W
Seattle, WA 98199
neighborhoodwarrior@gmail.com
(206) 769-8459

CERTIFICATE OF SERVICE

I, Elizabeth A. Campbell, certify that on May 1, 2025 I caused to be served a true and correct Word and PDF copy of the foregoing 1) NOTICE OF FILING, 2) DECLARATION OF ELIZABETH CAMPBELL 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 1, 2025, at Seattle, Washington.



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