



Elizabeth Campbell
<neighborhoodwarrior@gmail.com>

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

17 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>

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



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-  **THAYES ITRGs RFPs 04-16-25 Final.pdf**
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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.

[Quoted text hidden]

16 attachments



GSund ITRGs RFPs 04-16-25 Final.docx
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THAYES ITRGs RFPs 04-16-25 Final.docx

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Megan F. Starks

<mstarks@pattersonbuchanan.com>

Wed, Apr 16,
2025 at 9:13
PM

To: "Elizabeth Campbell, MPA"

<neighborhoodwarrior@gmail.com>, Alex Lopez

<alopez@ohaganmeyer.com>, Brad Bigos

<bbigos@ohaganmeyer.com>, "Kalzer, Karen A."

<kkalzer@helsell.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>

Ms. Campbell,

Apologies if I missed it somewhere in the email, but can you please send me a copy of the anonymous letter you reference throughout this discovery?

MS

Megan F. Starks, J.D. (she/her) | Principal Attorney

DIRECT [206.462.6727](tel:206.462.6727) | TOLL FREE [800.722.3815](tel:800.722.3815)

mstarks@pattersonbuchanan.com

SEATTLE

1000 Second Ave., 30th Floor

Seattle, WA 98104

P: [\(206\) 462-6700](tel:(206)462-6700) | F: [\(206\) 462-6701](tel:(206)462-6701)



PORTLAND

[1050 SW Sixth Ave., Ste 1100](tel:503.200.5400)

Portland, OR 97204

P: [\(503\) 200-5400](tel:(503)200-5400) | F: [\(503\) 200-5401](tel:(503)200-5401)

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

Sent: Wednesday, April 16, 2025 8:15:46 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>

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

[Quoted text hidden]

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Kalzer, Karen A. <kkalzer@helsell.com> Thu, Apr 17, 2025 at 4:04 PM

To: "mstarks@pattersonbuchanan.com"
<mstarks@pattersonbuchanan.com>, "Elizabeth Campbell, MPA" <neighborhoodwarrior@gmail.com>, Alex Lopez <alopez@ohaganmeyer.com>, Brad Bigos <bbigos@ohaganmeyer.com>, "Miguel E. Mendez-Pintado" <mmendezpintado@mpbf.com>, Nicholas Larson <nlarson@mpbf.com>, "Sarah A. Tatistcheff" <SAT@pattersonbuchanan.com>

Elizabeth - I would need a copy of this letter as well.
KAK

From: mstarks@pattersonbuchanan.com

<mstarks@pattersonbuchanan.com>

Sent: Wednesday, April 16, 2025 9:13 PM

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

Alex Lopez <alopez@ohaganmeyer.com>; Brad Bigos

<bbigos@ohaganmeyer.com>; Kalzer, Karen A.

<kkalzer@helsell.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>

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

[EXTERNAL MESSAGE]

[Quoted text hidden]

Elizabeth Campbell, MPA
<neighborhoodwarrior@gmail.com>

Fri, Apr 18,
2025 at 7:25
AM

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

Hi Megan and Karen,

Thanks for your note I referenced the letter in my interrogatories as context for the questions I posed, not as a document I intend to rely on or produce at this time. Because the letter was mailed to me anonymously and without authentication, I am not producing it at this time.

Best,

Elizabeth

EACampbell

[Quoted text hidden]

Moore, Leili K. <LMoore@helsell.com> Mon, Apr 21, 2025 at 3:58 PM

To: "neighborhoodwarrior@gmail.com"

<neighborhoodwarrior@gmail.com>

Cc: "Kalzer, Karen A." <kkalzer@helsell.com>, "Ritts, Jessica R." <jritts@helsell.com>

Hello Elizabeth,

Will you please be so kind to email us discovery requests to Leander and Hayes in a Word format.

Thank you much.

Regards,

~ Leili

Leili Moore | Helsell Fetterman LLP

Litigation Coordinator & Legal Assistant to

Karen A. Kalzer, Shawn Q. Butler, Sara B. Amies,
Kaylee Cox

800 Fifth Avenue, Suite 3200

Seattle, WA 98104

direct | 206.689.2131

fax | 206.340.0902

Imoore@helsell.com

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From: neighborhoodwarrior@gmail.com

[<neighborhoodwarrior@gmail.com>](mailto:neighborhoodwarrior@gmail.com)

Sent: Wednesday, April 16, 2025 8:16 PM

To: Alex Lopez [<alopez@ohaganmeyer.com>](mailto:alopez@ohaganmeyer.com); Brad Bigos

[<bbigos@ohaganmeyer.com>](mailto:bbigos@ohaganmeyer.com); Kalzer, Karen A.

[<kkalzer@helsell.com>](mailto:kkalzer@helsell.com); Megan F. Starks

[<mstarks@pattersonbuchanan.com>](mailto:mstarks@pattersonbuchanan.com); Miguel E. Mendez-Pintado

[<mmendezpintado@mpbf.com>](mailto:mmendezpintado@mpbf.com); Nicholas Larson

[<nlarson@mpbf.com>](mailto:nlarson@mpbf.com); Sarah A. Tatistcheff

[<SAT@pattersonbuchanan.com>](mailto:SAT@pattersonbuchanan.com)

Cc: Elizabeth Campbell [<Neighborhoodwarrior@gmail.com>](mailto:Neighborhoodwarrior@gmail.com)

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

[EXTERNAL MESSAGE]

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Elizabeth Campbell, MPA

<neighborhoodwarrior@gmail.com>

Mon, Apr 21,
2025 at 4:25
PM

To: "Moore, Leili K." <LMoore@helsell.com>

Hi Leili, here are the Word Copies. Best, Elizabeth
Campbell

----- Forwarded message -----

From: **Elizabeth Campbell, MPA**

<neighborhoodwarrior@gmail.com>

Date: Wed, Apr 16, 2025 at 8:18 PM

Subject: Re: Discovery Lead Case No. 23-2-25128-8

Elizabeth Campbell v. Matthiesen et al

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>

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Moore, Leili K. <LMoore@helsell.com>

Mon, Apr 21, 2025 at
4:29 PM

To: "neighborhoodwarrior@gmail.com"
<neighborhoodwarrior@gmail.com>

Thank you so much.

Regards,
~ Leili

Leili Moore | Helsell Fetterman LLP
Litigation Coordinator & Legal Assistant to

Karen A. Kalzer, Shawn Q. Butler, Sara B. Amies,
Kaylee Cox

800 Fifth Avenue, Suite 3200

Seattle, WA 98104

direct | 206.689.2131

fax | 206.340.0902

lmoore@helsell.com

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From: neighborhoodwarrior@gmail.com

[<neighborhoodwarrior@gmail.com>](mailto:neighborhoodwarrior@gmail.com)

Sent: Monday, April 21, 2025 4:25 PM

To: Moore, Leili K. [<LMoore@helsell.com>](mailto:LMoore@helsell.com)

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

[EXTERNAL MESSAGE]

[Quoted text hidden]

Nicholas Larson [<NLarson@mpbf.com>](mailto:NLarson@mpbf.com)

Fri, Apr 25, 2025 at
11:51 AM

To: "Elizabeth Campbell, MPA"

[<neighborhoodwarrior@gmail.com>](mailto:neighborhoodwarrior@gmail.com), Alex Lopez

[<alopez@ohaganmeyer.com>](mailto: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



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

Sent: Wednesday, April 16, 2025 8:16 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 Mendez-Pintado

<mmendezpintado@mpbf.com>; Nicholas Larson

<NLarson@MPBF.com>; Sarah A. Tatistcheff

<SAT@pattersonbuchanan.com>

Cc: Elizabeth Campbell <Neighborhoodwarrior@gmail.com>

[Quoted text hidden]

[Quoted text hidden]

Elizabeth Campbell, MPA



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>

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

[Quoted text hidden]



LMATT Summary 04-25-25.pdf
148K

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

Web: www.helsell.com

Pronouns: She/her/hers

From: neighborhoodwarrior@gmail.com

[<neighborhoodwarrior@gmail.com>](mailto:neighborhoodwarrior@gmail.com)

Sent: Friday, April 25, 2025 5:26 PM

To: Nicholas Larson [<NLarson@mpbf.com>](mailto:NLarson@mpbf.com)

Cc: Alex Lopez [<alopez@ohaganmeyer.com>](mailto:alopez@ohaganmeyer.com); Brad Bigos

[<bbigos@ohaganmeyer.com>](mailto:bbigos@ohaganmeyer.com); Kalzer, Karen A.

[<kkalzer@helsell.com>](mailto:kkalzer@helsell.com); Megan F. Starks

[<mstarks@pattersonbuchanan.com>](mailto:mstarks@pattersonbuchanan.com); Miguel Mendez-Pintado

[<mmendezpintado@mpbf.com>](mailto:mmendezpintado@mpbf.com); Sarah A. Tatistcheff

[<SAT@pattersonbuchanan.com>](mailto:SAT@pattersonbuchanan.com); Elizabeth Campbell

[<Neighborhoodwarrior@gmail.com>](mailto:Neighborhoodwarrior@gmail.com)

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

[EXTERNAL MESSAGE]

[Quoted text hidden]

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

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

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

Sent: Friday, April 25, 2025 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>

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Elizabeth Campbell, MPA
<neighborhoodwarrior@gmail.com>

Tue, Apr 29,
2025 at 4:13

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

[Quoted text hidden]

Elizabeth Campbell, MPA



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"

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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.

[Quoted text hidden]

Elizabeth Campbell, MPA

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

To All Defense Counsel of Record

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

Dear Counsel,

Thank you for your continued correspondence regarding discovery.

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

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

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

This approach is consistent not only with CR 26(i), but with the Washington Supreme Court's recognition in *Mayer v. Sto Industries, Inc.*, 156 Wn.2d 677, 684–85 (2006), that "The discovery rules... contemplate that parties will make a good-faith effort to resolve discovery disputes without court involvement."

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

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

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

I feel it is unfortunate, but I am under the impression that defense counsels' stated preference not to meet individually with me "at this time", the insistence that only a Zoom/phone call will suffice, and the refusal to put anything in writing, including even a

rudimentary explanations or justification for this "ALL" call, has all the hallmarks of a defense, strategic effort to engineer a pretextual, procedural record for potential motion practice without first meaningfully engaging on the merits of the discovery requests.

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

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

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

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

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

Sincerely,

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

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Elizabeth Campbell, MPA



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