

EXHIBIT B

HONORABLE MARK A. LARRAÑAGA
TRIAL DATE: 3/2/2026

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

ELIZABETH A. CAMPBELL, an
individual,
Plaintiff,

v.

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

Defendants.

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

**DEFENDANT LANGDON MILLER'S
RESPONSES TO PLAINTIFF'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION**

Defendant, Langdon Miller ("Miller" or "Defendant"), hereby responds to Plaintiff Elizabeth A. Campbell's ("Campbell" or "Plaintiff") First Interrogatories and Requests for Production as follows:

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INTERROGATORIES

INTERROGATORY NO. 1.: Identity of the Letter's Author: Do you have any knowledge of the identity of the person or entity who wrote or sent the Letter to Plaintiff? If yes, state the identity and describe how you obtained this knowledge; from July 1, 2024 to the present.

ANSWER: Defendant objects to the general nature and scope of Plaintiff's requests. Defendant objects to Plaintiff's first set of Interrogatories and Requests for Production to Swedish Club on the grounds that discovery Plaintiff's propounded to Defendants on April 16, 2024, is overly broad and unduly burdensome. Plaintiff has served a grand total of 518 interrogatories and 443 requests for production, serving 29 interrogatories and 40 requests for production to the Swedish Club. That is not counting discrete subparts in many of those requests, making the number even greater. It would impose an unreasonable burden and cost on Defendants to respond to such an unreasonable number of requests.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. An anonymous letter dated circa July 2024 is not reasonably related to the pending claims in this matter.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 2.: Involvement in the Letter: Did you, or anyone acting on your behalf, author, send, or contribute to the drafting or mailing of the Letter? If yes, provide details, including dates, methods, and reasons for your involvement or gaining knowledge of the preparation, transmission of it; from December 1, 2024 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. An anonymous letter dated circa July 2024 is not reasonably related to the pending claims in this matter.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 3.: Kristine Leander's Role: The Letter states that "Kristine Leander is the evil behind all of this" and references a "scheme." Describe any actions, statements, or plans by Kristine Leander, or by you or one of your fellow defendants, or any other person, that you are aware of relating to the termination of Plaintiff's membership in the Swedish Club, and exclusion from the Swedish Club as a member, as a member of the public, including dates, reasons, and any notices provided to Plaintiff, or of the events described in the First Amended Complaint related to Plaintiff's Swedish Club membership; from August 15, 2020 to present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. An anonymous letter dated circa July 2024 is not reasonably related to the pending claims in this matter.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit.

Defendant objects to this interrogatory on the grounds that it is vague as to what is meant by “exclusion from the Swedish Club” as it could be interpreted to mean the formal termination of Plaintiff’s employment and/or membership, exclusion from the physical premises of the Swedish Club, or informal exclusion from conversations, social events, or associations with individual members or “cliques” within the Swedish Club.

Further, Defendant objects to this interrogatory as overbroad and unduly burdensome because it requests Defendant identify “all actions, statements, or plans” made by Kristine Leander or the dozens of additional people - parties of which Defendant does not have personal knowledge. It further requests they identify all actions, statements, or plans which “led to” the termination of Plaintiff’s membership – a request which could be interpreted to cover potentially any action, policy, or statement having any conceivable relationship to the termination of any Swedish Club membership (or exclusion of member of the public).

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

INTERROGATORY NO. 4.: Alleged Gossip: The Letter claims Kristine Leander spread “salacious gossip” about Plaintiff “around the club and among the members.” Identify all instances you are aware of where Kristine Leander, you, or any other Defendant, member, or other person

discussed Plaintiff with club members or staff, including dates, locations, identity of the participants, and the content of those discussions from August 15, 2020 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 and is not reasonably calculated to lead to the discovery of admissible evidence. An anonymous letter dated circa July 2024 is not reasonably related to the pending claims in this matter.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this interrogatory on the grounds that it invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome because it asks Defendant to identify "all instances" where Kristine Leander and other Defendants, members, and people discussed Plaintiff – discussions of which Defendant does not have personal knowledge.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 5.: Public Argument with Lars Matthiesen: The Letter references a “clamorous and public argument” between Plaintiff and Defendant Lars Matthiesen at the Swedish Club, attributing it to Kristine Leander. State whether you have knowledge of this incident, including the date, location, witnesses, and any role Kristine Leander played in causing or escalating it; from January 1, 2021 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties’ claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects that this interrogatory is unintelligible as written and vague as to whether it is asking about facts related to the alleged incident or related to how that knowledge was obtained.

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this interrogatory on the grounds that it invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

INTERROGATORY NO. 6.: Employment Termination: The Letter asserts that “Kristine is the reason you no longer work there.” Describe all actions taken by Kristine Leander, you, or other Defendants, Swedish Club employees or board members, or others that contributed to Plaintiff’s

termination from employment at the Swedish Club, including the identity of any person, dates, reasons provided, and any related communications August 1, 2020 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant objects to this interrogatory on the grounds that it is overbroad because it asks Defendant to describe "all actions" taken by Kristine Leander, other defendants, Swedish Club employees or board members, or "others" – actions of dozens of people of which Defendant has no personal knowledge.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. The contents of an anonymous letter are not reasonably related to Plaintiff's claims in this matter.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 7.: Exclusion from the Club: The Letter states that "Kristine is the reason you are no longer allowed to enter the club." Identify all decisions, policies, or actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board members, or others that led to the termination of Plaintiff's membership and exclusion from the Swedish Club as a member, as a member of the public, including dates, reasons, and any notices provided to Plaintiff; from September 1, 2020 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this interrogatory on the grounds that it is overbroad in scope and unduly burdensome because it asks Defendant to describe "all decisions, policies, or actions" taken by Kristine Leander, other defendants, Swedish Club employees or board members, or "others" – actions of dozens of people of which Defendant has no personal knowledge.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 8.: Exclusion from the Club: Identify all decisions, policies, or actions by Kristine Leander, you, or other Defendants, Yourself, Swedish Club employees or board members, or others that led to the termination of any Swedish Club member's membership and exclusion from the Swedish Club as a member, as a member of the public, including dates, reasons, and any notices provided to those members; from June 1, 2019 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with

the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this interrogatory on the grounds that it is overbroad in scope because it asks Defendant to describe “all decisions, policies, or actions” taken by Kristine Leander, other defendants, Swedish Club employees or board members, or “others” – actions of dozens of people of which Defendant has no personal knowledge.

Defendant further objects to this request on the grounds that it is unduly burdensome. It would impose unreasonable burden and cost on Defendant to detail any decisions, policies, or actions that led to the termination of any member in the past six years.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

INTERROGATORY NO. 9.: Scheme Allegation: The Letter claims Plaintiff’s termination and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any plans, agreements, or coordinated efforts by you or among Defendants. Yourself, or with others to terminate Plaintiff’s employment or the termination of Plaintiff’s membership, including participants, timelines, and objectives; from August 15, 2020 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests.

Defendant further objects to this request on the grounds that it is overbroad and unduly burdensome. It would impose unreasonable burden and cost on Defendant to investigate any potential “plans, agreements, or coordinated efforts” including “participants, timelines, and

objectives” by dozens of defendants that led to the termination of Plaintiff’s employment or membership.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

INTERROGATORY NO. 10.: Witnesses: Identify all individuals (by name, address, and phone number, if known) who have knowledge of the events or statements referenced in the Letter, including those related to Kristine Leander’s actions toward Plaintiff; from August 15, 2020 to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests.

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant objects that this interrogatory is unintelligible as written and vague as to whether it is asking about facts related to the alleged events or related to how that knowledge was obtained.

Defendant objects to this interrogatory on the grounds that it is vague as to what is meant by “events or statements referenced in the Letter.” This letter, which has not been produced to Defendants, does not appear to refer to any specific statements made by Defendant Miller or anyone else.

Defendant further objects to this interrogatory on the grounds that, as it relates to events referenced in this Letter, it seeks information duplicative of that sought by Interrogatories 5, 6, and 7.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

INTERROGATORY NO. 11.: Formation Date: State the date on which the governance and bylaws committee was officially formed by the Swedish Club's board of directors.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 as it does not relate to the parties' claims and defenses, and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 12.: Purpose and Objectives: Describe the purpose and objectives of the governance and bylaws committee as established by the Swedish Club's board of directors.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory seeks information that is outside the permissible scope of discovery pursuant to CR 26 as it does not relate to the parties' claims and defenses, and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 13.: Committee Membership: Identify each person who has served as a member of the Swedish Club's governance and bylaws committee from its formation to the present, including their full name, role on the committee, and the dates of their service.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this interrogatory as overbroad in time as it seeks information from inception to present, covering time periods after Plaintiff commenced this lawsuit. To that extent, this interrogatory is unduly burdensome.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 14.: Meeting List: List all meetings held by the governance and bylaws committee from its formation to the present, including the date, time, location, and attendees of each meeting. For each meeting identified provide a detailed summary of the topics discussed, any decisions made, and any actions taken or proposed.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this interrogatory as overbroad in time as it seeks information from inception to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects on the grounds this interrogatory is overbroad in scope and unduly burdensome as it asks Defendant to detail every meeting without any limitation to topics discussed and actions taken at any particular meeting.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B). For every meeting, it asks Defendant to detail 1) the topics discussed, 2) any decisions made, and 3) any actions taken or proposed.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 15.: Communications with Langdon Miller- You: Identify all communications, including but not limited to emails, letters, memoranda, and notes, between members of the governance and bylaws committee and You from July 1, 2024, to the present, that relate to the committee's activities, including but not limited to any proposed changes to the Swedish Club's bylaws, or member conduct standards.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant objects to this interrogatory on the grounds that it is overbroad and unduly burdensome as it asks Defendant to identify "all communications" including emails, letters, memoranda, and notes – implying that each individual email, letter, or other communication must be identified individually. It would impose unreasonable and undue burden on Defendant to identify and describe each communication without any limitation of topic or action taken.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 16.: Communications with Board Members: Identify all communications between members of the governance and bylaws committee and You and other members of the Swedish Club's board of directors from July 1, 2024, to the present, that relate to the committee's activities, proposed changes to the bylaws, or member conduct standards.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant objects to this interrogatory on the grounds that it is unduly burdensome as it asks Defendant to identify "all communications" including emails, letters, memoranda, and notes – implying that each individual email, letter, or other communication must be identified individually. It would impose unreasonable and undue burden on Defendant to identify and describe each communication without any limitation of topic or action taken.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 17.: Communications with Executive Director: Identify all communications between You, and/or members of the governance and bylaws committee and the executive director of the Swedish Club from July 1, 2024, to the present, that relate to the committee's activities, proposed changes to the bylaws, or member conduct standards.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this interrogatory as overbroad in time as it seeks information to present, covering time periods after Plaintiff commenced this lawsuit. Defendant objects to this interrogatory on the grounds that it is unduly burdensome as it asks Defendant to identify "all communications" including emails, letters, memoranda, and notes – implying that each individual email, letter, or other communication must be identified individually. It would impose unreasonable and undue burden on Defendant to identify and describe each communication without any limitation of topic or action taken.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 18.: Proposed Bylaw Amendments: Describe in detail any proposed amendments or changes to the Swedish Club's bylaws that have been discussed, drafted, or considered by the governance and bylaws committee.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant objects to this interrogatory on the ground it is overbroad in time and scope, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory contains no reasonable limitation on time or subject of the proposed amendment or changes thereto.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 19.: Proposed Member Conduct Standards: Describe in detail any member conduct standards, codes of conduct, or similar policies that have been discussed, drafted, or considered by the governance and bylaws committee.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant objects to this interrogatory on the ground it is overbroad in time and scope, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory contains no reasonable limitation on time or subject of the proposed amendment or changes thereto.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 20.: Experts and Legal Advisors: Identify all experts, consultants, or legal advisors who have provided advice, consultation, or services to the governance and bylaws committee regarding the reform of the Swedish Club's governance, bylaws, or member conduct standards. For each individual identified state the dates on which advice or services were provided and the general topics addressed, without disclosing privileged information.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Defendant objects to this interrogatory on the ground it is overbroad in time and scope, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory contains no reasonable limitation on time or subject matter in question.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 21.: Discussions on Membership Terminations: Has the governance and bylaws committee discussed or considered the termination of any member's membership, including but not limited to the termination of Elizabeth A. Campbell's membership on March 9, 2023 or any other member's membership? If so, describe in detail the nature of those discussions and any conclusions reached.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Defendant objects to this interrogatory on the ground it is overbroad in time and scope, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory contains no reasonable limitation on time or particular reasons for considering termination of a member's membership besides Plaintiff's.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 22.: Reasons for Committee Formation: What prompted the formation of the governance and bylaws committee? Please describe the reasons and circumstances that led to its establishment.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant objects that this interrogatory is duplicative of Interrogatory No. 12. This interrogatory is also is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B). It seeks descriptions of the 1) reasons for the formation of the committee; and 2) the circumstances that led to its establishment.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 23.: Retroactive Justifications: Has the governance and bylaws committee proposed or discussed any changes to the bylaws or policies that would retroactively justify or validate past actions taken by the Swedish Club, its board, or its officers, including but not limited to the termination of members' memberships? If so, describe those proposed changes and the discussions surrounding them.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects on the grounds this interrogatory is overbroad in time and scope and, to that extent, is not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory contains no reasonable limitation on time or subject of the retroactive action, if any, besides the topic of termination of memberships.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 24.: Member Input: Has the governance and bylaws committee sought or received any input, feedback, or comments from Swedish Club members regarding proposed changes to the bylaws or member conduct standards? If so, describe how this input was solicited and summarize the feedback received.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates its objections to Interrogatory No. 23 *mutatis mutandis*.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 25.: Proposed Termination Procedures: Has the governance and bylaws committee discussed or proposed any procedures for terminating a member's membership, including notice requirements, due processes, or appeal mechanisms? If so, describe those proposed procedures in detail.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates its objections to Interrogatory No. 23 *mutatis mutandis*.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 26.: Legal Opinions on Compliance: Has the governance and bylaws committee obtained any legal opinions or reviews regarding the compliance of proposed bylaw changes or member conduct standards with applicable laws, including but not limited to RCW 24.03A? If so, describe the findings of such reviews, without disclosing privileged information.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further incorporates its objections to Interrogatory No. 20 *mutatis mutandis*. Defendant objects to this interrogatory on the grounds that it seeks information protected by the attorney-client privilege and work product doctrine.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 27.: Identify Former Leader: Identify the "former leader" referred to in the Board President's Letter dated February 2025, who is alleged to have made multiple false allegations about the Swedish Club, its leadership, and certain members and employees.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 and is not reasonably calculated to lead to the discovery of admissible evidence. The identity of a person identified in a letter dated circa February 2025 is not reasonably related to the pending claims or defenses thereto.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 28.: Board Member History: List all individuals who served on the Swedish Club’s board of directors from January 1, 2022, to the present, including their terms of service. For each individual who is no longer serving on the board, state the date they left the board and the reason for their departure (e.g., term expired, resigned, removed).

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests. Defendant further incorporates its objections to Interrogatory No. 13 *mutatis mutandis*. Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

INTERROGATORY NO. 29.: Former Complaints: Identify any former members or leaders, or employees (past or present) of the Swedish Club who have filed lawsuits, formal complaints, or made public statements against the club, its leadership, or its employees from January 1, 2022, to the present.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests. Defendant objects to this interrogatory on the ground it is overbroad in time and scope, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory contains no reasonable limitation on time or subject of the complaint or “statement”. It would impose unreasonable and undue burden on Defendant to investigate and detail any “public statement” made about the club on any topic.

Defendant further objects that this interrogatory contains discrete subparts which must be counted separately for purposes of determining the number of interrogatories and compliance with the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B).

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 30.: Defendant Status: Is the "former leader" referred to in the Board President's Letter dated February 2025 one of the defendants in this lawsuit? If yes, please identify which defendant.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates its objections to Interrogatory No. 27 *mutatis mutandis*.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 31.: Lawsuit Role: Describe your role in the Swedish Club's defense of this lawsuit, including any meetings you attended where the lawsuit was discussed, the dates of those meetings, and the other attendees.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this interrogatory on the grounds that it invades

the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Defendant further objects that Plaintiff's interrogatories have exceeded the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B) and therefore this interrogatory need not be answered.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

INTERROGATORY NO. 32.: Lawsuit Influence on Committee: Did the filing of the lawsuit by Elizabeth A. Campbell influence the decision to form the governance and bylaws committee or the scope of its work? If so, please explain how.

ANSWER: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects that this interrogatory is duplicative of Interrogatory No. 22.

Defendant further objects that Plaintiff's interrogatories have exceeded the limitation on the number of interrogatories which party may propound pursuant to LCR 26(b)(2)(B) and therefore this interrogatory need not be answered.

Without waiving any objections, Defendant answers as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

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REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1) Documents Related to the Letter: All documents, communications, or drafts related to the creation, sending, or receipt of the Letter, including envelopes, notes, or correspondence discussing its contents or purpose; from December 1, 2024 to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. The contents of an anonymous letter are not reasonably related to Plaintiff's claims in this matter.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 2) Communications by Kristine Leander: All documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander that mention Plaintiff, Plaintiff's employment, or Plaintiff's membership at the Swedish Club from August 15, 2020 to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose an

unreasonable burden on Defendant to search for and provide documents authored by Leander, when such documents are equally available from a more appropriate source.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 3) Gossip Evidence: All documents reflecting statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club employees or members, or third parties, as referenced in the Letter, including dates and recipients; from August 15, 2020 to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose an unreasonable burden on Defendant to search for and provide documents authored by Leander, when such documents are equally available from a more appropriate source.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 4) Public Argument Records: All documents, reports, or communications held, received, or transmitted by You related to the "clamorous and public argument" between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of December

17, 2021, including witness statements, incident logs, or correspondence about the incident; from December 17, 2021 to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this request as overbroad in time as it requests documents to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to the extent this request invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 5) Employment Termination Records: All documents related to Plaintiff's termination from employment at the Swedish Club, including personnel files, performance reviews, disciplinary records, emails, meeting notes or communications involving Kristine Leander or other Defendants, Swedish Club employees, board members, or third parties; from March 1, 2021 to present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this request as overbroad in time as it requests documents to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose an unreasonable burden on Defendant to search for and provide requested documents when such documents are available from a more appropriate source.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 6) Membership Exclusion Records: All documents related to Plaintiff's exclusion from the Swedish Club as a member, including membership records, board minutes, board directors'/executive directors' emails between each other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff's membership, or Kristine Leander, or communications involving Kristine Leander or other Defendants, Swedish Club employees, board members, or third parties; from August 15, 2020 to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose an unreasonable burden on Defendant to search for and provide requested documents when such documents are available from a more appropriate source.

Defendant further objects to this request as overbroad in time as it requests documents to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this request on the grounds that it is vague as to what is meant by "Plaintiff's exclusion." This could be interpreted to mean formal expulsion or informal exclusion such as being socially ostracized. Accordingly, this request does not describe the requested documents with reasonable particularity as required by CR 34.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 7) Scheme Documentation: All documents evidencing any plan, agreement, or “scheme” by Kristine Leander or other Defendants to terminate Plaintiff’s employment or revoke Plaintiff’s membership, as alleged in the Letter, including internal communications or directives; from December 1, 2021 to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests.

Defendant further objects to this request as overbroad in time as it requests documents to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this request on the grounds that it is vague as to the terms “plan, agreement, or ‘scheme’”. These terms are not defined and could be interpreted in a number of different ways, requiring Defendant to speculate as to what documents this request is actually seeks. Accordingly, this request does not describe the requested documents with reasonable particularity as required by CR 34.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 8) Defendant Communications: All communications between Defendants from October 1, 2020 to the present discussing Plaintiff, the Letter, or the claims in this lawsuit.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests.

Defendant further objects on the grounds that this request is overbroad in scope and unduly burdensome as it seeks “all communication” between *all* Defendants discussing Plaintiff, the Letter, or the claims in this lawsuit – essentially, relating to the entirety of these proceedings. The vast majority of these communications are not within Defendant’s possession, custody, or control.

Defendant further objects to this request as overbroad in time as it requests documents to present, covering time periods after Plaintiff commenced this lawsuit. Defendant further objects to this request on the grounds that it invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 9.: Formation Documents: All documents related to the formation of the governance and bylaws committee, including but not limited to board meeting minutes, resolutions, emails, and memoranda discussing or approving its establishment.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as overbroad in time to the extent it cover time periods after Plaintiff commenced this lawsuit.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 10.: Meeting Records: All meeting minutes, agendas, notes, and recordings from meetings of the governance and bylaws committee from its formation to the present.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as overbroad in time to the extent it cover time periods after Plaintiff commenced this lawsuit.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 11.: Communications with Langdon Miller/You: All communications, including emails, letters, memoranda, and notes, between members of the governance and bylaws committee and You from July 1, 2024, to the present, that relate to the committee's activities, proposed changes to the bylaws, or member conduct standards.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects that this request covers time periods after Plaintiff commenced this lawsuit. It seeks documents created after Plaintiff commenced this litigation.

Defendant further objects to the extent this request invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 12.: Communications with Board Members: All communications between members of the governance and bylaws committee and Yourself, or other members of the Swedish Club's board of directors from July 1, 2024, to the present, that relate to the committee's activities, proposed changes to the bylaws, or member conduct standards.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects that this request covers time periods after Plaintiff commenced this lawsuit. It seeks documents created after Plaintiff commenced this litigation.

Defendant further objects to this request on the grounds that it seeks, in part, information duplicative of that sought by RFP No. 11. Defendant further objects that, insofar as it seeks communications between members of the governance and bylaws committee and other members of the Swedish Club board of directors, this request seeks documents which are not within Defendant Miller's possession, custody, or control.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 13.: Communications with Executive Director: All communications between You, members of the governance and bylaws committee and the

executive director of the Swedish Club from July 1, 2024, to the present, that relate to the committee's activities, proposed changes to the bylaws, or member conduct standards.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects that this request covers time periods after Plaintiff commenced this lawsuit. It seeks documents created after Plaintiff commenced this litigation

Defendant objects to this request on the grounds that it seeks, in part, information duplicative of that sought by RFP No. 11. Defendant further objects that, insofar as it seeks communications between members of the governance and bylaws committee and executive director, this request seeks documents which are not within Defendant Miller's possession, custody, or control.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 14.: Communications with Members: All communications between members of the governance and bylaws committee and Yourself, and members of the Swedish Club from July 1, 2024, to the present, that relate to the committee's activities, proposed changes to the bylaws, or member conduct standards.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses

and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects that this request covers time periods after Plaintiff commenced this lawsuit. It seeks documents created after Plaintiff commenced this litigation

Defendant further objects to this request on the grounds that it seeks, in part, information duplicative of that sought by RFP No. 11. Defendant further objects that, insofar as it seeks communications between members of the governance and bylaws committee and members of the Swedish Club, this request seeks documents which are not within Defendant Miller's possession, custody, or control.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 15.: Draft Bylaws: All draft versions of the Swedish Club's bylaws or proposed amendments to the bylaws that have been created, circulated, or discussed by the governance and bylaws committee.

RESPONSE: Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request on the grounds that it seeks documents that are not within his possession, custody or control. It would impose an unreasonable burden on Defendant to search for and provide requested documents when such documents are available from a more appropriate source, and have little or no probative value to the pending claims.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 16.: Draft Conduct Standards: All documents related to member conduct standards, codes of conduct, or similar policies that have been created, proposed, or discussed by the governance and bylaws committee.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose an unreasonable burden on Defendant to search for and provide requested documents when such documents are available from a more appropriate source, and have little or no probative value to the pending claims.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 17.: Expert Advice Documents: All communications, reports, and documents related to any advice, consultation, or services provided by experts, consultants, or legal advisors to the governance and bylaws committee regarding the reform of the Swedish Club's governance, bylaws, or member conduct standards, excluding privileged attorney-client communications.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose an unreasonable burden on Defendant to search for and provide requested documents when such documents are available from a more appropriate source, and have little or no probative value to the pending claims.

Defendant further objects to the extent this request invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 18.: Termination Discussions Documents: All documents related to any discussions or considerations by the governance and bylaws committee regarding the termination of members' memberships, including but not limited to the termination of Elizabeth A. Campbell's or any other member's membership.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request is overbroad in time and scope and, to that extent, is not reasonably calculated to lead to the discovery of admissible evidence. The request is not limited in time to subject matter, besides Plaintiff's termination. Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 19.: Formation Reasons Documents: All documents related to the decision to form the governance and bylaws committee, including but not limited to board meeting minutes, emails, and memoranda discussing the need for such a committee.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant further objects to this request on the grounds that it invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 20.: Retroactive Changes Documents: All documents related to any proposed changes to the bylaws or policies that address or relate to past actions taken by the Swedish Club, its board, or its officers, particularly concerning membership terminations.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests.

Defendant further objects that this request seeks information that is outside the permissible scope of discovery pursuant to CR 26 because it does not pertain to the parties' claims or defenses

and is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request on the grounds that it seeks documents and communications that are not within his possession, custody or control. It would impose unreasonable and undue burden on Defendant to search for and produce communications pertaining to the time after Plaintiff commenced this lawsuit.

Defendant further objects to this request on the grounds that it invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 21.: Member Input Documents: All documents related to any input, feedback, or comments received from Swedish Club members regarding proposed changes to the bylaws or member conduct standards, including but not limited to surveys, emails, letters, and meeting notes.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates his objections to Request No. 20 *mutatis mutandis*.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 22.: Termination Procedures Documents: All documents related to any discussions or proposals by the governance and bylaws committee regarding procedures for terminating a member's membership.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates his objections to Request No. 20 *mutatis mutandis*.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 23.: Other Relevant Documents: Any and all other documents not already produced in response to the above requests that relate to the activities of the governance and bylaws committee.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates his objections to Request No. 20 *mutatis mutandis*.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 24.: False Allegations Documents: Produce all documents, including but not limited to emails, letters, memoranda, and notes, that relate to the false allegations made by the "former leader" as mentioned in the Board President's Letter dated February 2025.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates his objections to Request No. 20 *mutatis mutandis*.

Defendant objects to this request on the grounds that it is vague as to what is meant by "false allegations" and "former leader." This requires Defendant to perform a subjective

assessment of what allegations by the unidentified “former leader” Plaintiff considers false, leading to future disputes over compliance.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 25.: Meeting Minutes on Allegations: Produce all minutes, agendas, recordings, and notes from meetings of the Swedish Club’s board of directors, governance committee, or any other committees, from January 1, 2024, to the present, where discussions took place regarding false allegations made by former members or leaders, or regarding the content of the Board President’s Letter dated February 2025.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff’s discovery requests. Defendant further incorporates his objections to Request No. 20 *mutatis mutandis*.

Defendant further objects to this request on the grounds that it is vague as to what is meant by “false allegations” and “former members or leaders.” This requires Defendant to perform a subjective assessment of what allegations by the unidentified “former leader” Plaintiff considers false, leading to future disputes over compliance.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff’s discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 26.: Communications on Lawsuit: All documents related to communications between Langdon Miller and other members of the Swedish Club’s board of directors regarding the lawsuit filed by Elizabeth A. Campbell, excluding privileged attorney-client communications.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further incorporates his objections to Request No. 20 *mutatis mutandis*. While it excludes attorney-client privileged communications, Defendant further objects to this request on the grounds that it invades the work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

REQUEST FOR PRODUCTION NO. 27.: Committee Formation Documents: All documents related to the decision to form the governance and bylaws committee, including any references to the lawsuit filed by Elizabeth A. Campbell.

RESPONSE: Defendant incorporates its objections in its answer to Interrogatory No. 1 regarding the nature and scope of Plaintiff's discovery requests. Defendant further objects to this request on the grounds that it invades the attorney-client privilege, work product doctrine, common interest privilege, or other applicable protection from discovery. Such documents will not be provided.

Defendant further objects to this request on the grounds that it is duplicative of documents sought by RFP No. 23, 20, and 19.

Without waiving any objections, Defendant responds as follows. Defendant agrees to meet and confer with Plaintiff to determine a reasonable scope for Plaintiff's discovery requests, if possible.

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Dated May 19, 2025

O'HAGAN MEYER PLLC

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