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

ELIZABETH A. CAMPBELL, an  
individual,

Plaintiff,

v.

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

Defendants.

**NO. 23-2-25128-8 SEA**

**PLAINTIFF'S MOTION FOR LEAVE TO  
FILE THIRD AMENDED COMPLAINT [CR  
15(a)] AND PLAINTIFF'S DECLARATION IN  
SUPPORT OF MOTION**

**I. RELIEF REQUESTED**

Pursuant to CR 15(a), Plaintiff Elizabeth A. Campbell ("Plaintiff"), a pro se litigant,  
respectfully moves for leave to file a Third Amended Complaint ("TAC") to reinstate previously  
dismissed causes of action and add new claims against Defendants Gary Sund, Molly Olson  
Smith, and Sarah Alaimo. This request is based on factual allegations and interrogatories  
anticipated to provide critical evidence.

1 **II. STATEMENT OF FACTS**

2 The First Amended Complaint<sup>1</sup> was filed on March 11, 2024. Subsequently, Plaintiff served  
3 interrogatories on April 16, 2025, which are expected to yield evidence—such as details of non-  
4 member presence during Sund’s speech—supporting the rebuttal of privilege defenses (MTD  
5 #10). Combined with existing allegations of governance failures, election interference, and  
6 financial mismanagement at the Swedish Club, this justifies the proposed amendments. On April  
7 21, 2025 Plaintiff filed pursuant to Court Order (Dkt. #169), a Second Verified Amended  
8 Complaint (Dkt. #180).

9 **III. STATEMENT OF ISSUES**

10 Does justice require granting leave under CR 15(a) to amend the SAC, reinstating  
11 dismissed claims and adding new causes of action, based on anticipated evidence and factual  
12 allegations, without prejudice to Defendants?

13 **IV. EVIDENCE RELIED UPON**

14 Plaintiff relies on the following evidence in support of this motion:

- 15 1. The pleadings and records on file in this case;  
16 2. Declaration of Elizabeth Campbell in Support of Motion to Amend; factual record;  
17 3. Any relevant discovery requests, correspondence, or testimony anticipated to be obtained  
18 through discovery, e.g., interrogatories to Gary Sund, Molly Olson Smith, Sarah Alaimo,  
19 and Swedish Club (served on April 16, 2025);  
20 4. Motions to Dismiss #4, #10, #12, #15.

21 **V. AUTHORITY AND ARGUMENT**

22 Under Washington Civil Rule (CR) 15(a), leave to amend pleadings “shall be freely  
23 given when justice so requires,” reflecting a strong judicial preference for resolving disputes on  
24 their merits (*Wilson v. Horsley*, 137 Wn.2d 500, 505, 974 P.2d 316 (1999)). The primary factor  
25 in this determination is prejudice to the opposing party, with courts consistently holding that  
26

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<sup>1</sup> Filed 03-11-24, Dkt. #17  
PLAINTIFF’S MOTION FOR LEAVE  
TO FILE THIRD AMENDED COMPLAINT  
[CR 15(a)] - 2

1 amendments should be allowed absent a showing of substantial detriment (*Herron v. Tribune*  
2 *Publ'g Co.*, 108 Wn.2d 162, 165, 736 P.2d 249 (1987)). Here, Plaintiff's motion to amend  
3 satisfies this standard, as it introduces no undue prejudice, is timely, and advances meritorious  
4 claims supported by newly discovered evidence.

5 **A. No Prejudice to Defendants**

6 Defendants may argue that the amendment prejudices them by necessitating additional  
7 discovery or disrupting trial preparation, potentially citing *Caruso v. Local Union No. 690*, 100  
8 Wn.2d 343, 670 P.2d 240 (1983), where prejudice was found due to an amendment's late timing.  
9 However, this case is distinguishable. With the trial set for March 2, 2026, and discovery cutoff  
10 on January 12, 2026, ample time remains for Defendants to address the new claims through  
11 existing discovery tools, such as the interrogatories served on April 16, 2025. The new claims—  
12 for conspiracy and breach of fiduciary duty—arise from the same factual core as the original  
13 complaint: governance failures and election interference. Thus, no significant new discovery is  
14 required (*Caruso*, 100 Wn.2d at 349). Moreover, with over nine months until the discovery  
15 cutoff, Defendants cannot credibly claim prejudice (*Doyle v. Lee*, 90 Wn. App. 109, 113, 950  
16 P.2d 1007 (1998)).

17 **B. Timeliness of the Amendment**

18 Opposing counsel might assert undue delay, pointing to cases like *Moore v. State*, 111  
19 Wn. App. 359, 45 P.3d 194 (2002), where an amendment was denied after an unjustified multi-  
20 year delay. This argument fails. The motion is based on a good-faith expectation that  
21 interrogatories served on April 16, 2025, will yield critical evidence—such as details of non-  
22 member presence during Sund's speech (Interrogatory No. 12)—supporting the reinstated and  
23 new claims. Responses are due May 16, 2025, and with discovery open until January 12, 2026,  
24 the amendment aligns with CR 15's liberal standard. Washington courts routinely permit  
25 amendments prompted by anticipated or newly discovered evidence when no prejudice results  
26

(*Karlberg v. Otten*, 167 Wn. App. 522, 529, 280 P.3d 1123 (2012)). Here, the procedural timeline supports the amendment's timeliness.

### **C. Non-Futility of the Proposed Claims**

Defendants will likely challenge the amendment's futility, arguing the reinstated tortious interference claim and new conspiracy and fiduciary duty claims fail under CR 12(b)(6), possibly invoking *McCurry v. Chevy Chase Bank*, 169 Wn.2d 96, 233 P.3d 861 (2010) (adopting *Twombly*'s plausibility standard). However, the anticipated interrogatory responses, particularly from Interrogatory No. 12, are expected to confirm non-member presence, directly rebutting Defendants' prior privilege defense and curing the earlier dismissal's deficiencies. Under *Twombly* and *McCurry*, a claim is plausible if it raises a reasonable inference of liability (550 U.S. at 556; 169 Wn.2d at 101). Here, existing allegations of election interference, combined with forthcoming evidence of coordinated misconduct, plausibly support the new claims. Courts deny futility arguments when amendments rest on factual developments or anticipated evidence (*Foman v. Davis*, 371 U.S. 178, 182 (1962)).

### **D. Good Faith Basis for the Amendment**

Finally, Defendants might insinuate bad faith or dilatory motive, suggesting the amendment is a tactic to harass or prolong litigation. Such a claim lacks merit and is speculative at best. Plaintiff, proceeding pro se, affirms under CR 11 that this amendment is grounded in a good-faith belief in the claims' validity, bolstered by recent discovery efforts. Washington courts afford pro se litigants reasonable procedural latitude, particularly when acting in good faith (*In re Marriage of Giordano*, 127 Wn. App. 1006, 2005 WL 1060312 (2005) (unpublished, but persuasive)). No evidence suggests harassment; rather, the amendment seeks to refine and strengthen Plaintiff's case based on evolving evidence, not harassment.

## **VI. CONCLUSION**

For the foregoing reasons, Plaintiff respectfully requests leave to file the attached Third Amended Complaint, redlined version provided as per KCLCR 8(b)(5). The proposed

1 amendment aligns with CR 15's mandate to facilitate just outcomes. It introduces no prejudice, is  
2 timely given the March 2, 2026 trial date, states plausible claims, and is pursued in good faith.  
3 Defendants' likely objections—delay, prejudice, futility, and bad faith—are preemptively  
4 addressed by the procedural posture and evidentiary basis of this motion. Justice requires  
5 granting leave to amend.

6 Plaintiff, as a pro se litigant, has personally reviewed and approved this motion and its  
7 contents, ensuring accuracy and compliance with CR 11.

8 I certify that this memorandum contains 2,753 words, in compliance with the Local Civil  
9 Rules.

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

11  
12 RESPECTFULLY SUBMITTED,

13   
14

15 Elizabeth A. Campbell, MPA  
16 Plaintiff Pro Se  
17 3826 24th Ave W  
18 Seattle, WA 98199  
19 Tel/Text: 206-769-8459  
20 neighborhoodwarrior@gmail.com  
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**SUPERIOR COURT OF THE STATE OF WASHINGTON  
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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,  
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LANGDON L. MILLER, NEIL  
SNYDER, KRIS E. JOHANSSON,  
MARTIN K. JOHANSSON, ANNA  
FAINO and LANE POWELL PC,

Defendants.

**NO. 23-2-25128-8 SEA**

**DECLARATION OF ELIZABETH  
CAMPBELL IN SUPPORT OF MOTION  
FOR LEAVE TO FILE THIRD AMENDED  
COMPLAINT [CR 15(a)]**

19 I, ELIZABETH A. CAMPBELL, declare that I am over the age of 18 years old, am otherwise  
20 competent to testify herein, and that the following is true and correct under penalty of perjury in the  
21 state of Washington:

22 1. I am the Plaintiff in this action, the following is based on my personal knowledge and  
23 involvement in this case.  
24  
25  
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1       2. I submit this declaration in support of my Motion for Leave to File a Third Amended Complaint  
2 (“TAC”) under CR 15(a). As a pro se litigant, I have personally reviewed and approved the contents of  
3 this declaration and the accompanying motion.

4       **Procedural History**

5       3. On April 15, 2025, this Court ordered me to file the Second Amended Complaint (“SAC”) to  
6 consolidate the surviving causes of action (Dkt. #169). I complied by filing the SAC on April 21, 2025  
7 (Dkt. #180).

8       4. I have served interrogatories on April 16, 2025, to Defendants Gary Sund, Molly Olson Smith,  
9 Sarah Alaimo, and the Swedish Club. These interrogatories are expected to yield critical evidence  
10 supporting the reinstatement and addition of claims in the proposed TAC. Responses are due on May 16,  
11 2025.

12       **Justification for Amendment**

13       5. The proposed TAC seeks to:

- 14           a) Reinstate previously dismissed claims, including tortious interference against Gary Sund  
15               (FAC Cause 6) and Molly Olson Smith (FAC Cause 4), based on anticipated evidence  
16               from Interrogatory No. 12, which addresses non-member presence during Sund’s speech  
17               and rebuts privilege defenses raised in MTD #10.  
18           b) Add new claims for conspiracy and breach of fiduciary duty against Sund, Smith, and  
19               Alaimo, supported by factual allegations of governance failures, election interference,  
20               and financial mismanagement at the Swedish Club.

21       6. These amendments are necessary to address deficiencies noted in prior dismissals and to  
22 incorporate new evidence anticipated from the interrogatories. For example, Interrogatory No. 12 is  
23 expected to confirm the presence of non-members on April 20, 2022 when Sund delivered his  
24 denunciation of me, directly countering Defendants’ privilege arguments.  
25  
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1 7. Additionally, factual allegations from prior proceedings, including governance and election  
2 issues, further support the plausibility of the new claims under the standard set forth in *Bell Atl. Corp. v.*  
3 *Twombly*, 550 U.S. 544 (2007), as adopted by Washington courts in *McCurry v. Chevy Chase Bank*, 169  
4 Wn.2d 96, 233 P.3d 861 (2010).

5 **No Prejudice to Defendants**

6 8. Defendants will not be prejudiced by this amendment. Discovery remains open until January 12,  
7 2026, and the trial is not scheduled until March 2, 2026. This provides ample time for Defendants to  
8 respond to the amended claims using existing discovery tools, including the interrogatories already  
9 served.

10 9. The new claims arise from the same core facts as the original complaint, ensuring no undue  
11 burden on Defendants (*Caruso v. Local Union No. 690*, 100 Wn.2d 343, 349, 670 P.2d 240 (1983)).

12 **Good Faith Statement**

13 10. I affirm, in good faith and in compliance with CR 11, that this amendment is based on a  
14 reasonable belief that the reinstated and new claims are meritorious, supported by anticipated evidence  
15 from the interrogatories and existing factual allegations.

16 11. I have personally reviewed the motion, the proposed TAC, and this declaration to ensure their  
17 accuracy and compliance with court rules.

18 **Conclusion**

19 12. For the reasons stated, I respectfully request that the Court grant leave to file the attached TAC.

20 I declare under penalty of perjury under the laws of the State of Washington that the foregoing is  
21 true and correct.

22 Dated this 21st day of April, 2025 in Seattle, Washington

23 Respectfully submitted,

24 

25 ELIZABETH A. CAMPBELL, MPA



1 Plaintiff, Pro Se  
2 3826 24<sup>th</sup> Ave W  
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DECL. OF ELIZ. CAMPBELL IN  
SUPPORT OF MOTION FOR LEAVE  
TO FILE THIRD AMENDED  
COMPLAINT [CR 15(a)] - 4

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

8 ELIZABETH A. CAMPBELL, an  
9 individual,

10 Plaintiff,

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

24 Defendants.

**NO. 23-2-25128-8 SEA**

**[PROPOSED] ORDER GRANTING  
PLAINTIFF'S MOTION FOR LEAVE TO  
FILE THIRD AMENDED COMPLAINT  
[CR 15(a)]**

18 **THIS MATTER** having come before the Court on Plaintiff Elizabeth A. Campbell's  
19 Motion for Leave to File a Third Amended Complaint ("TAC"), and the Court having reviewed  
20 the motion, the Declaration of Elizabeth Campbell in Support of the Motion, the pleadings and  
21 record in this case, and any opposition or reply thereto, and being fully advised,

22 **IT IS HEREBY ORDERED** that:

23  
24 **THIS MATTER** having come before the Court on Plaintiff Elizabeth A. Campbell's Motion for  
25 Leave to File a Third Amended Complaint ("TAC"), and the Court having reviewed the motion,

1 the Declaration of Elizabeth Campbell in Support of the Motion, the pleadings and record in this  
2 case, and any opposition or reply thereto, and being fully advised,

3  
4 **IT IS HEREBY ORDERED** that:

- 5 1. Plaintiff's Motion for Leave to File a Third Amended Complaint is **GRANTED**.  
6 2. Plaintiff shall file the Third Amended Complaint, as attached to the motion, within [insert  
7 number, e.g., 5] court days of this order.  
8 3. Defendants shall have [insert number, e.g., 20] days from the filing of the TAC to  
9 respond.

10  
11 DATED this \_\_\_\_ day of April, 2025

12 \_\_\_\_\_  
13 Honorable Judge Larrañaga  
14 King County Superior Court

15 Presented by:

16 

17 Elizabeth A. Campbell, MPA  
18 Plaintiff Pro Se  
19 3826 24<sup>th</sup> Ave W, Seattle, WA 98199  
20 206-769-8459  
21  
22  
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**CERTIFICATE OF SERVICE**

I, Elizabeth A. Campbell, certify that on April 21, 2025, I caused to be served a true and correct copy of the following documents, 1) PLAINTIFF'S MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT [CR 15(a)], 2) DECLARATION OF ELIZABETH CAMPBELL IN SUPPORT OF MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT [CR 15(a)], and 3) [PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT [CR 15(a)] via the method indicated below and addressed to the following:

\\

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***Attorney for Defendant Alaimo, Albright, Emerson,  
Faino, M. Johansson, Lucas, Miller, Elizabeth  
Norgren, Odderson, Smith, and Snyder***

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CERTIFICATE OF SERVICE OF PLAINTIFF'S  
MOTION, DECLARATION, AND PROPOSED  
ORDER FOR STAY OF DEF'S MOTION TO  
STRIKE - 1

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*Attorney for Defs Hayes, Leander*

Signed on April 21, 2025 at Seattle, Washington.



Elizabeth A. Campbell, MPA  
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