

SENT VIA EMAIL ONLY

Elizabeth A. Campbell, MPA
3826 24th Avenue West
Seattle, WA 98199
206-769-8459
neighborhoodwarrior@gmail.com

March 22, 2024

TO:

Martin K. Johansson

Molly Olson Smith

Gregory Albright

Ib Odderson

Kristine Leander

Shama Albright

Jane Isakson Lea Foundation

RE: Campbell v. Lucas et al King County Superior Court Case No. 23-2-25195-4 SEA
Request for Current Address and Contact Information

This is an important legal matter. In order to ensure that you are afforded a timely opportunity to defend yourselves in this matter it is important that you receive a copy of the case documents as soon as possible. Please note, according to the communications and notices I have received from your attorneys they have declined to accept service of process on your behalf, thus this communication with you. .

Several attempts have been made to serve the summons and complaint at your residences however it is my understanding that you either were not able to come to the door or otherwise unavailable. And two of you declined to accept service at the Swedish Club on Wednesday March 20, 2024.

To ensure that everything is being done in order to give you your copies of the case documents as soon as possible we're making sure we have your correct, current contact information by reaching out to others, see Mail Merge document.

I have attached a copy of my process service order that indicates the current information that is being used to serve you – please provide any corrections to that information that is in error.

I'd like to make a proposal that maybe you had not thought of, and that would be that either you or your attorney agree to accept service of process in the above entitled matter.

By agreeing to accept service you will avoid the possible stress evading service or the embarrassment of being publicly served, and it will save the court costs of serving the summons and complaints on you. You will keep all defenses or objections to the lawsuits, the court's jurisdiction, and the venue of the action.

SENT VIA EMAIL ONLY

For your convenience you or your attorney may email me at neighborhoodwarrior@gmail.com and let me know if you are amenable to an acceptance of service arrangement that would be completed on Monday, March 26th.

Please let me know what your choice is by 10:00 AM, Monday, March 25, 2024.

Thank you in advance for your time and consideration.

Sincerely,



Elizabeth A. Campbell
Plaintiff

Attachments

cc:

John Taylor Bender
jbender@correronin.com

Tia
tuy@correronin.com

Sheila
slarussa@correronin.com
Corr Cronin LLP

Michael Rhodes
mrhodes@mixsanders.com

Kenna Duckworth
kenna@mixsanders.com
Mix Sanders Thompson, PLLC

Elizabeth A. Campbell, MPA
3826 24th Avenue West
Seattle, WA 98199
206-769-8459
neighborhoodwarrior@gmail.com

March 22, 2024

«Name»
«Address»
«Address2»

MAIL MERGE DOCUMENT

RE: Campbell v. Lucas et al
King County Superior Court Case No. 23-2-25195-4 SEA

Request for Current Address and Contact Information for the Following Defendants:

«Name»

«Name»

This is an important legal matter. In order to ensure «Name» are afforded a timely opportunity to defend themselves in this matter it is important that they receive a copy of the case documents as soon as possible.

Several attempts have been made to serve the summons and complaint on them at their residence at «Address» «Address2», however they appeared to be either not able to come to the door or otherwise unavailable.

To ensure that everything is being done in order to give «Name» their copies of the case documents as soon as possible, and to be sure we have the most current residential and business address and contact information for them, I am respectfully requesting your assistance.

If the above address information for «Name» is not correct would you please provide me with the most recent residential address/business address and contact information that you have for them?

For your convenience you may either email the contact information to me at neighborhoodwarrior@gmail.com or call me at 206-769-8459.

Thank you in advance for your time and consideration it is very much appreciated.

Sincerely,



Elizabeth A. Campbell
Plaintiff

Superior Court of Washington, County of King

ELIZABETH A. CAMPBELL, an individual,
Plaintiff,

v.

SHARON LUCAS, an individual, MOLLY OLSON a/k/a MOLLY OLSON SMITH, an individual, TOENE HAYES, an individual, KRISTINE LEANDER, an individual, GARY SUND and VINDA SUND, individually, and the marital community thereof, ELIZABETH M. NORNGREN, an individual, LARS MATTHIESEN and YARA H. O. SILVA, individually, and the marital community thereof, VI RENO, an individual, SHAMA ALBRIGHT, an individual, GREGORY ALBRIGHT, an individual, MARY EMERSON, an individual, IB R. ODDERSON, and INGRID SALMON, individually, and the marital community thereof, LANGDON L. MILLER and MARTA K. SCHEE, individually, and the marital community thereof, NEIL SNYDER and LISA K. LINDSTROM, individually, and the marital community thereof, KRIS E. JOHANSSON, an individual, MARTIN K. JOHANSSON, an individual, ANNA FAINO and NICOLAUS FAINO, individually, and the marital community thereof, SARAH D. ALAIMO, and JOHN A. ALAIMO, individually, and the marital community thereof, SWEDISH CULTURAL CENTER d/b/a the SWEDISH CLUB, a Washington non-profit corporation, SWEDISH CLUB FOUNDATION, a Washington non-profit corporation, JANE ISAKSON LEA FOUNDATION, a Washington non-profit corporation, GREAT AMERICAN INSURANCE AGENCY INC., a foreign profit corporation, and LANE POWELL PC, a foreign profit corporation, PRIYA B. VIVIAN, and MATTHEW J. VIVIAN, individually, and the marital community thereof, and DOES 1-20, inclusive,
Defendants.

No. 23-2-25195-4 SEA

(Proposed)

Acceptance of Service

(Hon. Jason Holloway, Dept. 44)

Service Accepted (**Personal**)

1. I am (*name*): _____ . I accept service of the following documents (*check all that apply*):

<input checked="" type="checkbox"/> First Amended Complaint	
<input checked="" type="checkbox"/> Summons	

2. **Personal Jurisdiction** (*check one*):
 I **agree** this court has jurisdiction over me (or my client) for this case.
3. I (or the entity on whose behalf I am acting) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.
4. I also hereby acknowledge receipt of the Summons and a copy of the First Amended Complaint, upon this date, as though the same had been served upon defendant [Defendant] by the Sheriff or other person duly appointed or authorized by law to serve process.

Print name (if lawyer, also provide WSBA #)

Date

street address or P.O. box

city

state

zip

State of Washington

County of _____

I certify that I know or have satisfactory evidence that _____ (name of person) is the person who appeared before me, and said person acknowledged that (he/she) signed this instrument and acknowledged it to be (his/her) free and voluntary act for the uses and purposes mentioned in the instrument.

Dated: _____

(Seal or stamp) Signature

_____ Title

My appointment expires: _____

Service Accepted (LLC)

1. I am (*name*): _____ . I accept service of the following documents (*check all that apply*):

<input checked="" type="checkbox"/> First Amended Complaint	
<input checked="" type="checkbox"/> Summons	

2. **Personal Jurisdiction** (*check one*):
 I **agree** this court has jurisdiction over me (or my client) for this case.
3. I (or the entity on whose behalf I am acting) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.
4. I also hereby acknowledge receipt of the Summons and a copy of the First Amended Complaint, upon this date, as though the same had been served upon defendant [Defendant] by the Sheriff or other person duly appointed or authorized by law to serve process.

Sign here Print name (if lawyer, also provide WSBA #) Date

street address or P.O. box city state zip

State of Washington

County of _____

I certify that I know or have satisfactory evidence that _____ (name of person) is the person who appeared before me, and said person acknowledged that (he/she) signed this instrument, on oath stated that (he/she) was authorized to execute the instrument and acknowledged it as the Registered Agent of _____ (name of party on behalf of whom instrument was executed) to be the free and voluntary act of such party for the uses and purposes mentioned in the instrument.

Dated: _____

(Seal or stamp) Signature

Title

My appointment expires: _____

Service Request

LAST DAY Date/Time	Firm Name Elizabeth A. Campbell	Phone 206-697-4710 206-769-8459	Attorney Pro Se
	Address 3826 24th Ave N Seattle, WA 98199		Paralegal
	Case: Campbell vs Lucas et al		
	Cause No.: 23-2-25195-4 SEA King Co Superior Ct.	Client Matter Number	Date 03-22-24

Documents
Summons and First Amended Complaint

Signature Required On Documents
 Return Conformed Slip Only
 Return Conformed Copy
 Conform Original Do Not File

Other Instructions
Requesting additional service and skip tracing

See attached list of individuals, organization remaining to be served.	5. Johansson, 8. Smith, 10. Albright, 12. & 13 Leadner/Foundation 18. Matthiesen Silva, 21. Odderson, 22. Albright
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FILING	County	Superior Court	District Court (Indicate District)	Auditor	Appeals Court		Federal Court		Sea	Tac	State Supreme	Sec State
					I-Sea	II-Tac	Civil	Bnrprt				
	King	X										

Service Complete **Trace & Serve**

West Side Lake Union

1. (1 copies) **Swedish Club** –
1920 Dexter Ave N., Seattle, 98109
2. (1 copies) **Swedish Club Foundation** –
1920 Dexter Ave N. Seattle, 98109

Queen Anne Hill Neighborhood

3. (2 copies) **Neil Snyder and Lisa K. Lindstrom** - their residential address is
321 Highland Drive, Seattle, WA 98109
4. (1 copies) **Toene Hayes** - Her residential address is
3641 13th Avenue West, Seattle, WA 98119

Downtown Seattle

5. (1 copies) **Martin K. Johansson** - his residential address is
2515 4th Ave, Unit 804, Seattle, WA 98121
6. (1 copies) **Lane Powell PC** (hereinafter “Lane Powell”) principal place of business located at 1420 5th Ave, Suite 4200, Seattle, WA 98101-2375. LPSL Corporate Services, Inc is its registered agent in Washington with its principal place of business located at 1420 5th Ave, Suite 4200, Seattle, WA 98101-2375

Capitol Hill Neighborhood

7. (1 copies) **Vi Reno** –her residential address is 1301 Spring St, Apt 4E, Seattle, WA 98104-1350, *her law office address is* 1420 5th Ave Ste 3000 Seattle, WA 98101-2393

8. (1 copies) **Molly Olson Smith** - aka “Molly Olson”. Her residential address is 745 Bellevue Avenue East, Apt 201, Seattle, WA 98102

Greenlake Neighborhood

9. (1 copies) **Sharon Lucas** - Her residential address is
5601 McKinley Place North, Seattle, WA 98103-5933

Wedgewood Neighborhood

10. (1 copies) **Gregory Albright** - his residential address is
8606 35th Ave NE #302, Seattle, WA 98115

Magnolia Neighborhood

11. (2 copies) **Langdon L. Miller and Marta K. Schee** - their residential address is
3057 Perkins Lane West, Seattle, WA 98199.

Ballard Neighborhood

12. (1 copies) **Kristine Leander**
5608 34th Avenue Northwest, Seattle, WA 98107-3335
13. (1 copies) **Jane Isakson Lea Foundation**
5608 34th Avenue Northwest, Seattle, WA 98107-3335

14. (2 copies) **Priya B. Vivian and Matthew J. Vivian** - their residential address is 6536 Sycamore Ave NW, Seattle, WA. 98117-4846

North Seattle Area

15. (1 copies) **Kris E. Johansson** - his residential address is
11043 1st Ave NW, Seattle, WA 98177-4824
16. (2 copies) **Anna V. Faino and Nicolaus S. Faino** - residential address is
14600 Corliss Ave N., Seattle, WA 98133-6718 Note: not positive about address

City of Edmonds

- 17. (1 copies) **Elizabeth M. Norgren** - her residential address is, 20415 81st Ave W., Edmonds WA 98026-6716
she also is the registered agent for the two Swedish Club defendants (above) and is the executive director – her work address and the two Swedish Club defendants’ addresses are the same, 1920 Dexter Ave N., Seattle, WA 98199:

- 18. (2 copies) **Lars Matthiesen and Yara H. O. Silva** - residential address is 1200 Highland Drive, Edmonds, WA 98020,
their work address is Highland Refrigeration at 4250 24th Ave W, Seattle, WA. 98199

City of Mukilteo

- 19. (1 copies) **Mary A. Emerson** - her residential address is 4786 Wilmington Way Mukilteo, WA 98275

Eastside Area

- 20. (2 copies) **Gary Sund and Vinda Sund** - their residential address is 14218 NE 74th St., Redmond, WA 98052-4141

- 21. (2 copies) **Ib R. Odderson and Ingrid M. Salmon** – their residential address is 9319 NE 135th Lane, Kirkland, WA 98034

City of Duvall

- 22. (1 copies) **Shama Albright** – her residential address is 14157 271st PI NE, Duvall, WA 98019

City of Kent

- 23. (2 copies) **Sarah D. (Cline) Alaimo and John A. Alaimo** - their residential address 10117 SE 227th St, Kent, WA 98031-2153
works at the Swedish Club 1920 Dexter Ave N. Seattle, WA. 98109

31 sets of documents

LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA

4.1 **Sharon Lucas** - Her residential address is 5601 McKinley Place North, Seattle, WA 98103-5933. Profile Report: [Sharon Lucas](#)



4.2 **Molly Olson Smith** - Ms. Smith also goes by “Molly Olson”. Her residential address is 745 Bellevue Avenue East, Apt 201, Seattle, WA 98102. See Fairway attachment. Profile Report: [Molly Olson Smith](#) LinkedIn: [Molly Olson Smith](#)
See also Zoom meeting photos Pages 8-14



4.3 **Toene Hayes** - Her residential address is 3641 13th Avenue West, Seattle, WA 98119. Ms. Hayes is an abrupt, crabby person. Profile Report: [Toene Hayes](#)
See also Zoom meeting photos Pages 8-14



LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA

4.4 **Kristine Leander** - her residential address is 5608 34th Avenue Northwest, Seattle, WA 98107-3335. She is also the president of the Jane Isakson Lea Foundation – two sets of the documents needs to be served on her for herself, and for the “Jane Foundation.” Ms. Leander has two vehicles that are usually parked in front of her home; a small black pickup truck or a similarly colored, I believe, Subaru four door sedan or possibly an Outback type of vehicle. See also Zoom meeting photos Pages 8-14



Profile Report: [Kristine Leander](#) See also below – **Jane Isakson Lea Foundation**

4.5 **Gary Sund and Vinda Sund** - their residential address is 14218 NE 74th St., Redmond, WA 98052-4141. I believe that Mr. Sund is retired; it is my understanding that his wife, Vinda, is incapacitated or ailing – she may not be able to literally accept service, but I believe that she does reside at the above address. Profile Report: [Gary Sund](#) Profile Picture – See Zoom Meeting Sheets Pages 8-14

4.6 **Elizabeth M. Norgren** - her residential address is 20415 81st Ave W., Edmonds, WA 98026-6716, however – Ms. Norgren is employed as the executive director of the Swedish Club – she is the registered agent for the Swedish Cultural Center d.b.a. the Swedish Club, as well as the registered agent for the Swedish Club Foundation – both entities list their address as 1920 Dexter Ave North, Seattle, WA. 98109.



LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA

During business hours 10 AM to 5 PM M-F it is highly possible you would be able to serve defendants Ms. Norgren, the Swedish Club, and the Swedish Club Foundation at one time.

Ms. Norgren has an assigned, marked parking spot in the northwest corner of the parking lot directly next to the south side of the Swedish Club building, i.e. if there is a car parked in that space Ms. Norgren is likely present in the building.

Profile Report: [Elizabeth Norgren](#)

4.7 Lars Matthiesen and Yara H. O. Silva -



their residential address is 1200 Highland Drive, Edmonds, WA 98020; however, they often are at the business they own, Highland Refrigeration at 4250 24th Ave W, Seattle, WA. 98199.

Mr. Matthiesen arrives towards 9:00/9:30 AM and Ms. Silva arrives noon or later.

Mr. and Mrs. Silva drive 2020 Mercedes GLC vehicles -

Mr. Matthiesen's is grey/silver:



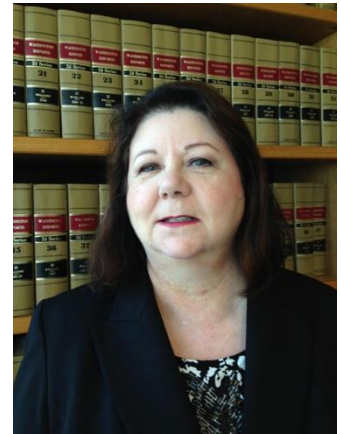
Ms. Silva's is dark gray:



LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA

If one or both vehicles are at the Highland Refrigeration office Mr. Matthiesen, Ms. Silva, or both may be at that address. Profile Reports: [Lars Matthiesen](#) [Yara Silva](#) LinkedIn: [Lars Matthiesen](#) [Yara Silva](#)

4.8 **J. Vi Reno** – is an attorney, her residential address is 1301 Spring St, Apt 4E, Seattle, WA 98104-1350, her law office address is 1420 5th Ave Ste 3000 Seattle, WA 98101-2393
Profile Report: [Vi Reno](#) See also Zoom meeting photos Pages 8-14



4.9 **Shama Albright** – her residential address is 14157 271st PI NE, Duvall, WA 98019. Ms. Albright has an engaging personality, shoulder length brown hair, and is a middle-aged version of her profile photo. Profile Report: [Shama Albright](#)
See also Zoom meeting photos on Pages 8-14



4.10 **Gregory Albright** - his residential address is 8606 35th Ave NE #302, Seattle, WA 98115. Profile Report: [Gregory Albright](#)

4.11 **Mary A. Emerson** - her residential address is 4786 Wilmington Way Mukilteo, WA 98275. She is a pleasant person. Profile Report: [Mary Emerson](#)

See also Zoom meeting photos on Pages 8-14



LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA

4.12 **Ib R. Odderson and Ingrid M. Salmon** - their residential address is 9319 NE 135th Lane, Kirkland, WA 98034. Both are pleasant people. Profile Report: [Ib Odderson](#)
See also Zoom meeting photos on Pages 8-14

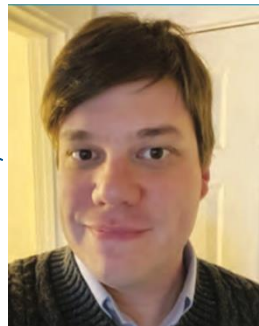
4.13 **Langdon L. Miller and Marta K. Schee** - their residential address is 3057 Perkins Lane West, Seattle, WA 98199. Profile Report: [Langdon Miller](#)

See also for Langdon Miller Zoom meeting photos on Pages 8-14

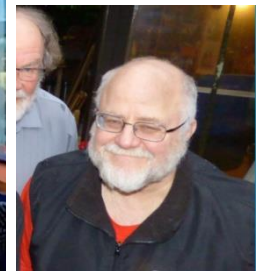


4.14 **Neil Snyder and Lisa K. Lindstrom** - their residential address is 321 Highland Drive, Seattle, WA 98109. Profile Reports: [Neal Snyder](#) Lisa Lindstrom. LinkedIn: Neil Snyder

See also for Neil Zoom meeting pictures Pages 8-14



4.15 **Kris E. Johansson** - his residential address is 11043 1st Ave NW, Seattle, WA 98177-4824. Reports: [Kris Johansson](#)



LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA

Kris Johansson continued: See also Zoom meeting photos Pages 8-14

4.16 **Martin K. Johansson** - his residential address is 2515 4th Ave, Unit 804, Seattle, WA 98121; Associated person at 4th Avenue address Betsy (Wohlers) Groat. Both residents are employed by the Seattle Symphony at 200 University Street, Seattle, WA. 98101, Mr. Johansson as a development communications manager. Profile Report: Martin K. Johansson [Betsy Groat](#)
LinkedIn: [Martin K. Johansson](#) [Betsy Groat](#)



4.17 **Anna V. Faino and Nicolaus S. Faino** - Their residential address is 14600 Corliss Ave N., Seattle, WA 98133-6718. Ms. Faino is employed by Seattle Children's Hospital. Profile Report: [Anna V. Faino](#)
LinkedIn: [Anna Faino](#)



Mr. Faino is employed by Esi 700 South Industrial Way, Seattle. LinkedIn:
<https://www.linkedin.com/in/nicolaus-faino/>



LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
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4.18 **Sarah D. (Cline) Alaimo and John A. Alaimo** -
their residential address is 10117 SE 227th St, Kent, WA 98031-2153
Ms. Alaimo works at the Swedish Club 1920 Dexter Ave N. Seattle,
WA. 98109. Profile Reports: [Saran D. Alaimo \(Cline\)](#) LinkedIn:
[Sarah Alaimo](#) Website: [Sarah Alaimo](#)

John Alaimo, Alaimo Consulting, LLC 10117
SE 227th St. Kent



4.19 **Swedish Cultural Center** d/b/a
the **Swedish Club** - its principal place of business is located at 1920 Dexter Avenue North, Seattle,
Washington 98109. **Elizabeth Norgren, see above** is its registered agent and resides at 20415 81st Ave
W, Edmonds, WA 98026-6716.

4.20 **Swedish Club Foundation** its principal place of business is located at 1920 Dexter
Avenue North, Seattle, Washington 98109. **Elizabeth Norgren, see above**, is the SCF's registered
agent and resides at 20415 81st Ave W, Edmonds, WA 98026-6716.

4.21 **Jane Isakson Lea Foundation** d/b/a the Jane Foundation, its principal place of
business located at 5608 34th Avenue North West. **Kristine Leander, see above** is its registered agent
and resides at 5608 34th Avenue Northwest, Seattle, 98107.

4.22 Defendant **Lane Powell PC** (hereinafter "Lane Powell") is registered with the
Washington Secretary of State as a Foreign Profit Corporation (Oregon), with its principal place of
business located at 1420 5th Ave, Suite 4200, Seattle, WA 98101-2375. LPSL Corporate Services, Inc is
its registered agent in Washington with its principal place of business located at 1420 5th Ave, Suite 4200,
Seattle, WA 98101-2375.

4.23 Defendant **Great American Insurance Agency Inc.** (hereinafter "Great American") is
registered with the Washington Secretary of State as a Foreign Profit Corporation (Ohio), with its
principal place of business located at 301 E. 4th St.. Cincinnati, OH 45202. United Agent Group Inc. is

LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
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its registered agent in Washington with its principal place of business located at 707 W. Main Ave., Suite B1, Spokane, WA. 99201-0631.

4.24 **Priya B. Vivian and Matthew J. Vivian** - their residential address is 6536 Sycamore Ave NW, Seattle, WA. 98117-4846. [Ms. Vivian works at Lane Powell PC](#) at 1420 5th Ave, Suite 4200, Seattle, WA. 98101. [Mr. Vivian works at Van Ness Feldman LLP](#) at 1191 Second Avenue Suite 1800 Seattle, WA 98101



Swedish Club Zoom meeting screenshots that include pictures of defendants, Alaimo, Albright, Emerson, Faino, Hayes, K. Johansson, M. Johansson, Leander, Miller, Odderson, Olson-Smith, Reno, Snyder, and Sund:

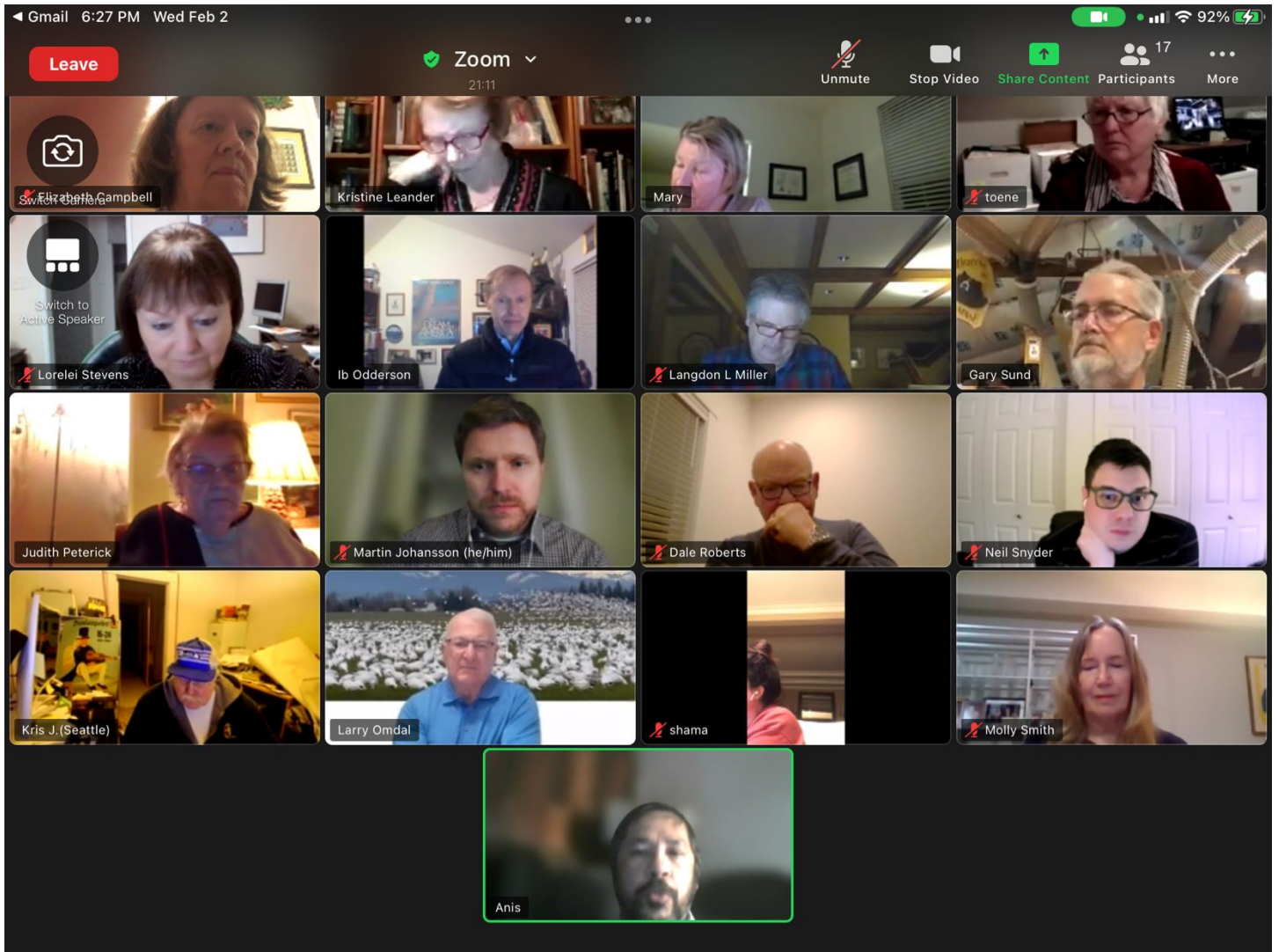
LIST OF DEFENDANTS TO BE SERVED in CAMPBELL V. LUCAS ET AL
KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA



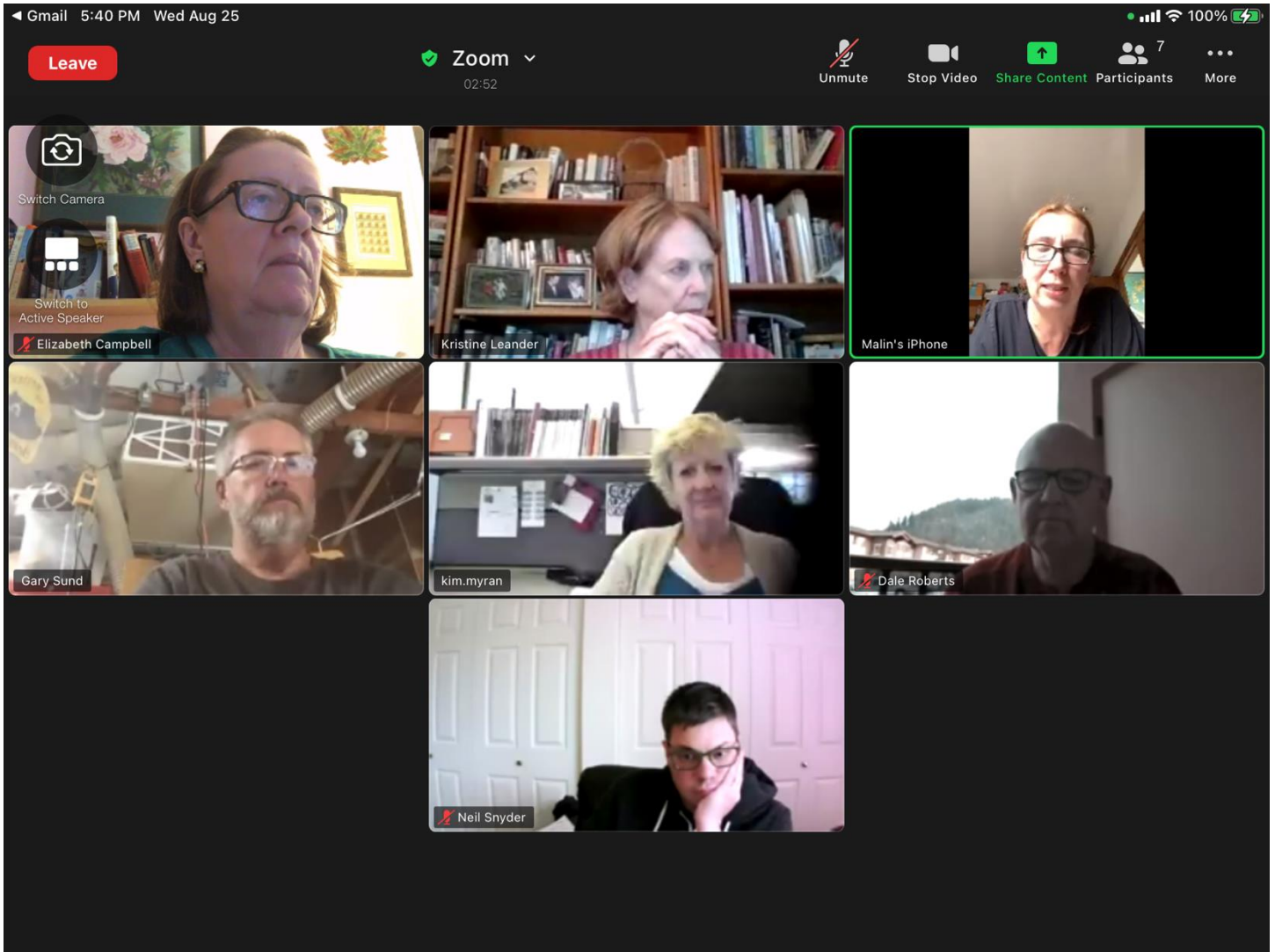
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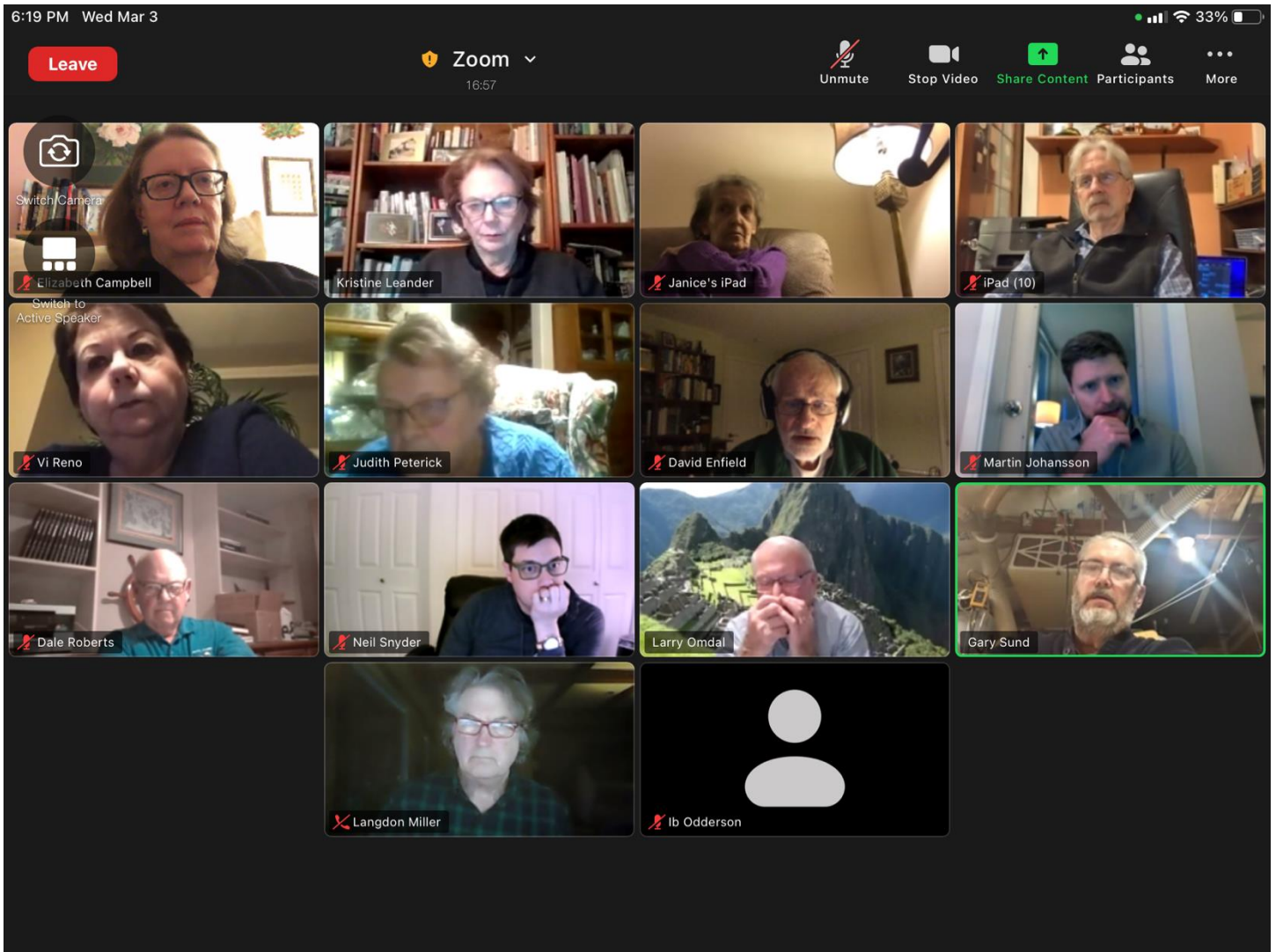
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KING COUNTY SUPERIOR COURT CASE 23-2-25195-4 SEA



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