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

<p>ELIZABETH A. CAMPBELL, an individual, Plaintiff, v. MICHAEL K. RHODES and JANE DOE RHODES, husband and wife, LEYDA GREENWOOD, JENNIFER KNAPP, MIX SANDERS THOMPSON, PLLC, a Washington professional limited liability corporation, and JOHN DOES 1-5 and JANE DOES 1-5, Defendants.</p>	<p>CASE NO. 24-2-11117-4 SEA COMPLAINT FOR DEFAMATION AND LIBEL <i>PER SE</i></p>
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COMPLAINT

Plaintiff, Elizabeth A. Campbell (“Ms. Campbell”) brings this action against defendants MICHAEL K. RHODES and JANE DOE RHODES, husband and wife, LEYDA GREENWOOD, JENNIFER KNAPP, MIX SANDERS THOMPSON, PLLC, a Washington professional limited liability corporation, and JOHN DOES 1-5 and JANE DOES 1-5,for damages and other relief as follows.

I. INTRODUCTION

1.1 On December 19, 2023 Plaintiff Ms. Campbell filed a lawsuit against the Swedish Club and others, hereinafter the “Swedish Club lawsuit,” against several of its officers, directors, and key employees related to Ms. Campbell’s claims of age and disability discrimination,

1 harassment, retaliation, wrongful termination, and associated intentional and negligent tort
2 claims, including assault and battery, against the Swedish Club defendants.

3 1.2 In March 2023 she amended her Swedish Club lawsuit pleadings. Since then, the
4 Swedish Club defendants and their nine lawyers have taken advantage of their apparently
5 unlimited litigation war chest, overwhelming numbers and support staff to inundate Ms.
6 Campbell with a wide range of motions and missives, seeking to derail her lawsuit.

7 1.3 Embedded in each of the now over 25 motions and oppositions documents filed
8 by Defendant Mr. Rhodes in the Swedish Club lawsuit are not just professionally unbecoming
9 fits of spleen, but instead are dozens of acid-tongue laced putdowns, Ms. Campbell, gross
10 misrepresentations about her, and including even taunting Ms. Campbell for being poor (she
11 lives at 102% of the federal poverty guideline and qualifies for public assistance). In that filing,
12 Mr. Rhodes was opposing Ms. Campbell's discovery efforts, Mr. Rhodes made it a point to sneer
13 that Ms. Campbell is not *that* poor.

14 1.4 Mr. Rhodes and the Swedish Club defendants herein have "misappropriate[d] a
15 judicial proceeding to achieve an improper and extrinsic end," immunity "neither preserves
16 'integrity of the judicial process,' nor 'further[s] the administration of justice.'" Scott, 22 Wn.
17 App. 2d at 267-68 (citations omitted).

18 1.5 In just short of two months time Mr. Rhodes' and his staff in their court filings on
19 behalf of their Swedish Club defendants have upped the prevalence and the nature of the name
20 calling and taunts against Ms. Campbell, going from "Frankenstein" to now outright drowning
21 Ms. Campbell in the court filings with pejorative statements and commentary about her, leveling
22 scurrilous accusations against her - Ms. Campbell the extortionist is included in their poison
23 arrow quiver.

24 1.6 The litigation privilege is just that: a privilege, not an absolute right, which does
25 not apply if—as here—it is abused.

1 1.7 The litigation privilege does not attach to sham or deficient court motions riddled
2 with ad hominem attacks, slurs, despicable name-calling, and manufactured “statements of fact”
3 about Ms. Campbell.

4 1.8 “Super Lawyer” and Rising Star Michael Rhodes WSBA #41911, and his
5 backroom cabal of paralegals, including defendants Knapp and Greenwood, have been cranking
6 out not just Mr. Rhodes’ defamatory statements for the Swedish Club defendants, but a reading
7 of the narratives in the flurry of motions and oppositions they have filed give every appearance
8 of many instances where writing styles emerge that are inconsistent with the idea that a
9 document was written by one author, Mr. Rhodes, the person who signed it, and that others are
10 involved in and in-fact using their creative and dramatic instincts to craft these documents.

11 1.9 In dime-store-novel-like fashion Rhodes’ 17 motions especially give every
12 appearance of being co-authored, with his support staff seizing their own piece of the stick-it-to-
13 Campbell pie and using their secretarial platform as an opportunity to be “super paralegals”, the
14 Super Lawyer’s handmaidens - coming up with their own fictitious narratives and invective
15 ridden constructs about who or what they think Ms. Campbell is, who or what the case that is
16 before the Court is about, and how or why they think Ms. Campbell should be their Ptomekin
17 villain.

18 1.10 The litigation privilege does not apply where lawyers (and their clients) and their
19 paralegals act in bad faith and in concert with one another, making up or repeating their make-
20 believe claims and statements. Their work product and resultant complaints, filings, or motions
21 as the case may be, must be the product of due diligence, based on an examination of evidence
22 and witnesses, on meaningful and thoughtful investigations, and made in good faith – not as
23 what has happened here - based instead on their rank vitriol and spite against Ms. Campbell,
24 based on their Swedish Club clients’ spite and vitriol, and on Rhodes’, Knapps’, and
25 Greenwoods’ all too apparent, personal predilection and preference to arrogantly rain scorn and
26 contempt on Ms. Campbell, and reap a dose of personal satisfaction, and of course win the praise

1 and acclaim from their Swedish Club clients, from their character assassinations of Ms.
2 Campbell.

3 1.11 Where the legitimacy of the judicial process is at issue, where reputations can be
4 destroyed because the kinds of charges that were overlooked for too long can now permanently
5 damn a person, guilty or not, if allowed to fester, the litigation privilege does not confer a right to
6 defraud the system of justice, and to hide behind it or leap over it to damn or damage another's
7 reputation – in this case Ms. Campbell's.

8 1.12 The Super Lawyer and his super-scrivener elves with their fairy tales have been
9 operating at full throttle in the underlying King County Superior Court Case No. 23-2-25195-4
10 SEA for the last two and a half months, cranking out a total of now over 500 pages of legal dreck
11 – the latest no less than 17 motions filed in one day against Campbell, comprising over 300
12 pages that Mr. Rhodes claims are CR 8 and CR 12(b)(6) motions – however, over half of which
13 are summary judgment motions, and a not so inconsequential platform for Mr. Rhodes and his
14 backroom keyboard warriors to churn out all manner of invective, incivilities, and inanities
15 against Ms. Campbell, cloaking it in the whole cloth of “motion practice”, when the majority of
16 their output is anything but that.

17 1.13 Ms. Campbell, both before and during the time since filing her lawsuit against the
18 Swedish Club has operated on the (sadly naïve) assumption that having been generous, albeit
19 foolish, having obeyed the law, having been a good Swedish Club member, having been a super
20 dedicated Swedish Club employee and generous friend to it, went willingly and with the utmost
21 cooperation and thoughtfulness through the Club's \$80,000, five months long investigation of
22 herself, that most employees would seek to avoid at all costs, and having believed that in all the
23 matters complained of in her lawsuit that the Swedish Club's board of directors literally forced
24 her to file, because they not only refused to redress her grievances but retaliated against her in
25 the bargain, that she had nothing to fear – she believed that the justice system would bring
26

1 resolution and vindication for the wrongs and harms she had suffered as a Swedish Club member
2 and employee. She was wrong.

3 1.14 Ms. Campbell will ultimately be vindicated in the courts. In the meantime,
4 however, Ms. Campbell is being publicly attacked with the imprimatur of a well-known law
5 firm, Mix Sanders Thompson PLLC, and by their rising star counsel, Michael Rhodes, using the
6 King County Superior Court in a way that goes directly to Ms. Campbell's sense of duty,
7 humanity, loyalty, and social and civil advocacy for the rights of those traditionally
8 disenfranchised, women, the disabled, and those of a certain age, Ms. Campbell's age. Of course
9 she must fight back.

10 1.15 This complaint, which asserts claims under state defamation and other laws, is
11 how Mr Rhodes and his paralegal pool will be held accountable for their vicious, ongoing
12 scheme of distortion, extortion, and defamation of Ms. Campbell, for their abuse of process.

13 **II. PARTIES**

14 2.1 Elizabeth Campbell is a single individual, residing at 3826 24th Ave W, Settle,
15 WA, King County, hereinafter referred to as "Ms. Campbell."

16 2.2 Mix Sanders, Thompson PLLC is a Washington professional limited liability
17 corporation, d/b/a as Mix Sanders Thompson PLLC, and Mix Law Firm PLLC whose business address is
18 1601 5th Ave STE 1800, Seattle, WA, 98101-3263, King County, hereinafter referred to as "Mix Sanders".

19 2.3 Michael K. Rhodes is an attorney licensed to practice law in the state of
20 Washington, is married, resides in Snohomish County at 6232 181st Pl SW, Lynnwood, WA
21 98037-7218, is a principal of Mix Sanders, and all of his relevant actions alleged herein were
22 made as a part owner and agent of Mix Sanders.

23 2.4 Jennifer Knapp is employed as a legal assistant at the defendant law firm, Mix
24 Sanders, and resides in the state of Washington.

25 2.5 Leyda Greenwood is employed as a paralegal at the defendant law firm, Mix
26 Sanders, and resides in the state of Washington.

1 2.6 On information and belief John Does 1-5 whose true names are not presently
2 known, are employees or agents of Mix Sanders, PLLC, all of their relevant actions alleged
3 herein were made as employees or agents of Mix Sanders, and they reside in the state of
4 Washington.

5 2.7 On information and belief Jane Does 1-5 whose true names are not presently
6 known, are employees or agents of Mix Sanders, PLLC, all of their relevant actions alleged
7 herein were made as employees or agents of Mix Sanders, and they reside in the state of
8 Washington.

9 **III. JURISDICTION AND VENUE**

10 3.1 This Court has personal jurisdiction over defendants, all of whom have conducted
11 business activities in and directed to Washington and are primary participants in tortious acts in
12 and directed to Washington state.

13 3.2 Venue is proper in this Court pursuant to RCW 4.12.010-.025 in that all or a
14 substantial part of the events or omissions that give rise to the claims pled herein occurred in
15 King County; Campbell seeks damages for personal injury or torts against the Plaintiff in King
16 County, and her causes of action arose in King County.

17 **IV. FACTUAL ALLEGATIONS**

18 4.1 On December 19, 2023 Ms. Campbell filed a lawsuit¹ against the Swedish Club
19 and related defendants, the Swedish Club board of directors, and several of the Swedish Club’s
20 employees based on over two years of discriminatory, retaliatory, hostile workplace, and several
21 torts committed against Ms. Campbell by the defendants, it is hereinafter referred to as the
22 “Swedish Club lawsuit.”

23 4.2 Mr. Rhodes is the attorney of record in the Swedish Club lawsuit for defendants
24 Swedish Club/Swedish Club Foundation, its directors Albright, Emerson, Faino, K. Johansson,
25 M. Johansson, Miller, Odderson, Smith, Snyder, Sund, and its employees Alaimo, Lucas, and
26 Norgren – hereinafter the Swedish Club defendants, or the unnamed co-defendants in this matter.

¹ King County Superior Court Case #23-2-25195-4 SEA.

1 4.3 Defendants Ms. Greenwood and Ms. Knapp provide paralegal and legal assistant
2 services respectively to Mr. Rhodes.

3 **PERJURED DECLARATIONS FILED BY RHODES**

4 4.4 Mr. Rhodes, Ms. Knapp, Ms. Greenwood, and John and Jane Does 1-5 with the
5 assistance of their Swedish Club defendants have produced and published not one but now two
6 perjured declarations to shore up their attempts to dismiss Ms. Campbell’s lawsuit against the
7 Swedish Club, as part of an all out effort on Mr. Rhodes and their parts to discredit Ms.
8 Campbell, to further harass her, and to cause damage to her reputation in the process.

9 **PERJURED DECLARATION NO. ! – CHRISTO YARANOFF**

10 4.5 On April 17, 2024 Mr. Rhodes filed the first perjured declaration in the Swedish
11 Club lawsuit, *Declaration of Christo Yaranoff*, to support Mr. Rhodes’ objection to Ms.
12 Campbell engaging in discovery during the course of the Swedish Club lawsuit, she was seeking
13 court approval for issuance of subpoena duces tecum to a third-party witness.

14 4.6 On April 19, 2024 Ms. Campbell wrote Mr. Rhodes and provided to him her
15 statements as well as evidence that Mr. Yaranoff was flat out lying in his declaration about his
16 association with Ms. Campbell while they were co-employees at the Swedish Club. Mr.
17 Yaranoff swore under penalty of perjury in his declaration that he had only one time “talked” to
18 Ms. Campbell – and only then she had spoken to him, that there had been no conversation
19 between them; that there had been no communications as employees between them.

20 4.7 Ms. Campbell’s letter to Mr. Rhodes included copies of work emails between Mr.
21 Yaranoff and Ms. Campbell, as well as detailed text and other dates and subject matter when
22 conversations between Ms. Campbell and Mr. Yaranoff had taken place at their workplace.

23 4.8 Ms. Campbell demanded that Mr. Rhodes correct the court record in the Swedish
24 Club lawsuit, that Mr. Rhodes must notify the Court of the falsity of the Yaranoff declaration,
25 and deliver an apology.

1 4.9 Mr. Rhodes “corrected” the record with a second declaration from Yaranoff,
2 doubling down on Mr. Yaranoff’s deceptions, claiming that Yaranoff hadn’t understood what a
3 conversation between two people was, but that it didn’t matter – any conversation he had had
4 with Ms. Campbell was of no consequence to Mr. Yaranoff, it was so trifling that he hadn’t
5 really lied, he didn’t consider talking, emailing, or otherwise engaging in work related
6 communications with Ms. Campbell as real communications.

7 PERJURED DECLARATION NO. 2 – ELIZABETH M. NORNGREN

8 4.10 Shortly thereafter on April 26th, as part of an eighth motion in Rhode’s the series
9 of 17 motions to dismiss he filed against Ms. Campbell to dismiss the Swedish Club Lawsuit,
10 Mr. Rhodes filed a second declaration that is facially perjured, this one from the current
11 executive director of the Swedish Club, Elizabeth Norgren.

12 4.11 Ms. Norgren’s April 25th declaration contained numerous false and libelous
13 statements, and was blatant perjury, especially in the context of how she knew it would likely be
14 used.

15 4.12 Ms. Norgren knowingly signed and passed along her April 25th false declaration
16 to Mr. Rhodes and others, aware that it would receive broader dissemination, and either would
17 likely be filed in a court proceeding, or she recklessly ignored that high likelihood

18 4.13 Among the multiples of perjured statements in her declaration, Ms. Norgren made
19 numerous mis-statements about Ms. Campbell, and Ms. Norgren’s especially claimed and
20 unequivocally stated that for the first six months of Ms. Norgren’s tenure as the club’s executive
21 director, between March 6, 2023 to mid-September 2023, that she had no idea that Ms. Campbell
22 was a person who existed, that she had zero to do with the employment related retaliation and
23 wrongful termination of Ms. Campbell, and that Ms. Norgren had zero to do with any
24 impairment of Ms. Campbell’s membership at the Swedish Club, or that Ms. Norgren had zero
25 knowledge of Ms. Campbell’s association with the Swedish Club.
26

1 4.14 The preposterousness of and unlikelihood of Ms. Norgren’s sworn statements, and
2 that in fact Ms. Norgren was lying was established by Ms. Campbell in her second letter to Mr.
3 Rhodes about perjured declarations he was filing in the Swedish Club court case.

4 4.15 On April 29th Ms. Campbell supplied Mr. Rhodes with copies of communications
5 between Ms. Norgren and Ms. Campbell, as well as established that it would be astonishing that
6 Ms. Norgren had never heard a scintilla of information about Ms. Campbell as she claimed –
7 considering that 1) the Swedish Club was the subject of City of Seattle administrative proceeding
8 against the Club, that the City was prosecuting Ms. Campbell’s EEOC/City of Seattle
9 discrimination and retaliation complaints against the Swedish Club, that as early as April 2023
10 the City was mailing its paperwork directly to the Swedish Club’s building where Ms. Norgren
11 worked and was in charge; 2) that Ms. Norgren was also advised in April 2023 via Ms.
12 Campbell’s litigation hold letter to Ms. Norgren and to the Swedish Club’s board of directors
13 that a lawsuit was pending and that Ms. Norgren was to safeguard and not destroy any of the
14 Club’s records related to Ms. Campbell’s employment and membership case, the discrimination,
15 retaliation, and wrongful termination claims she was pursuing against the Swedish Club; 3) that
16 Ms. Norgren had sat in on multiples of board meetings where Ms. Campbell’s pending legal
17 actions against the Club had been discussed; 4) that Ms. Norgren had no knowledge that Ms.
18 Campbell had been fired during the first week of Ms. Norgren’s tenure at the Swedish Club; 5)
19 that Ms. Norgren had no idea that the Swedish Club was preparing for mediation with Ms.
20 Campbell that would have required her to produce documents or other evidence to support the
21 Swedish Club’s efforts to defend or against or attack Ms. Campbell’s claims.

22 4.16 Ms. Campbell’s second letter to Mr. Rhodes about Ms. Norgren’s perjured
23 testimony likewise demanded that the perjured declaration be rescinded, and that the Court be
24 notified that Mr. Rhodes had filed this second perjured declaration, that his client had lied.

25 4.17 Over two weeks have passed since Ms. Campbell delivered her April 29th letter to
26 Mr. Rhodes about the perjured declaration. Mr. Rhodes has not responded to the letter, has not

1 even explained away nothing like he did with Yaranoff’s perjured declaration, has not rescinded
2 Ms. Norgren’s perjured declaration, and certainly has failed to advise the Court that it was
3 misled by Mr. Rhodes’ filing.

4 4.18 Instead, Mr. Rhodes and Norgren have double down on their attacks against Ms.
5 Campbell, leveling despicable claim in successive motions to dismiss Ms. Norgren out of the
6 Swedish Club lawsuit, about how Ms. Campbell is “obsessed” with Ms. Norgren, that Ms.
7 Campbell’s fact and evidenced based allegations about Ms. Norgren in Ms. Campbell’s Swedish
8 Club lawsuit rise to the level of harassment and libel against Ms. Norgren.

9 4.19 The in and out of court record about Ms. Norgren is clear, she is what its been
10 said she is –along with the Swedish Club’s derelict board - responsible for the turmoil, hostile
11 environment, and for the devastating dollar losses the Club has experienced under Ms. Norgren’s
12 tenure as the Swedish Club executive director. Why she and the Swedish Club unnamed co-
13 defendants need to lie about it goes to the heart of this case and others – to attack Ms. Campbell
14 and thereby her claims against the Swedish Club.

15 **RHODES’ PENCHANT FOR AD HOMINEM ATTACKS AGAINST MS. CAMPBELL,**
16 **UNDISGUISED CONTEMPT NOT LEGAL ADVOCACY**

17 4.20 Unfortunately, ad hominem attacks are countenanced and given wide latitude to
18 proliferate in litigation under the guise that they are just part and parcel of an attorney being a
19 vigorous advocate for their client, but more often these attacks are appealingly egregious
20 incidents of misogyny, racial intolerance, and in this case sexism and ageism at its worse – Ms.
21 Campbell is a 71 year old widow with a now over 20 years diagnosed physical disability.

22 4.21 Mr. Rhodes and his paralegal pool have far surpassed the already exceedingly low
23 bar for low attorney behavior, thus taking their statements, allegations, and off topic commentary
24 well out of the realm of privileged communications.

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1 **RHODES’ INTENTIONAL MISCHARACTERIZATION OF MS. CAMPBELL AND**
2 **HER SWEDISH CLUB LAWSUIT**

3 4.22 Mr. Rhodes has gone to great lengths to smear and denigrate Ms. Campbell in all
4 of his court filings, but especially in his latest round of motions – 17 in all, filed in the Swedish
5 Club lawsuit case on April 26th. He has brooked no opportunity in each of the motions to add a
6 sneer here, add an insult there, to vent his disgust or contempt for Ms. Campbell wherever
7 possible in his motions.

8 4.23 It cannot even be rationally, reasonably, or even straight-faced argued that his
9 running commentary against Ms. Campbell adds an ounce of gravitas or legitimacy to any of his
10 and his Swedish Club defendants’ motions.

11 4.24 Beginning with Mr. Rhodes shocking mis-characterization of Ms. Campbell’s
12 Swedish Club lawsuit pleadings, Rhodes in drama queen or court jester style pokes fun at what
13 Ms. Campbell experienced as an employee and member, that she faithfully recounted in her
14 lawsuit, about how she was mistreated by the Swedish Club defendants for over a now four-year
15 period. Mr. Rhodes conception of Ms. Campbell’s lawsuit is at best it is either a horror film or
16 one for the Guinness Book of World Records:

- 17 • “‘This case is supported by analogous federal case law that summarily dismisses these
18 types of Frankenstein complaints.’” *Rhodes’ Motion #1, Page 2, Line 20*
- 19 • “‘No doubt, Campbell’s Amended Complaint is one of the longest ever written in the
20 United States.’” *Rhodes’ Motion #1, Page 2, Line 22*
- 21 • “‘On March 11, 2024, Campbell filed her historic 476-page Amended Complaint and
22 named the Swedish Club Foundation, among many others, as a defendant.’” *Rhodes’*
23 *Motion #5, Page 2, Line 16*
- 24 • “‘Campbell’s historically lengthy Amended Complaint.’” *Rhodes’ Motion #6, Page 3, Line 1*

25 **RHODES’ AND HIS PARALEGALS’ PREJUDICIAL, PERFORMATIVE MOTIONS,**
26 **A PLATFORM FOR THEIR PUT DOWNS OF AND CONTEMPT FOR**
 MS. CAMPBELL AND HER COMPLAINT

 4.25 The motions filed by Mr. Rhodes follow a pattern. After his initial put downs of
Ms. Campbell Mr. Rhodes and his backroom scribes are off to the races – crafting what they
must think others will digest as the gospel about Ms. Campbell – but it is really a
mischaracterization of her, – mirrored back to Mr. Rhodes and the scribes it is an apt

1 characterization of them and their work – notable for the fact that a large amount of it is to cheap
2 one liners and word salads:

- 3 • “Campbell doubled down on her lengthy style.” *Rhodes’ Motion #1, Page 2, Line 13*
- 4 • A complaint is not the place for such verbosity.” *Rhodes’ Motion #1, Page 3, Line 16*
- 5 • “Campbell listed an exhausting 85 causes of action.” *Rhodes’ Motion #1, Page 3, Line 11*
- 6 • “Campbell’s rambling and ruminations contribute to the length of the complaint and has
7 made it unintelligible by scattering and concealing in a morass of irrelevancies in
8 between the few allegations that matter.” *Rhodes’ Motion #1, Page 7, Line 2*
- 9 • “Defendants should not be required to defend against a 476-page Amended Complaint
10 that imposes unfair burdens on them...sprawling pleading requires ‘a laborious
11 deconstruction and reconstruction of a great web of scattered, vague, redundant, and
12 often irrelevant allegations.’” *Rhodes’ Motion #1, Page 7, Line 10*
- 13 • “Court can take judicial notice that Campbell concurrently filed another 58-page
14 complaint, including allegations against one of the Defendants in this case. That one,
15 which is similarly verbose, contains the same kinds of irrelevant, irreverent, and
16 head-scratching commentary as this case.” *Rhodes’ Motion #1, Page 7, Line 15*
- 17 • “Most of the conclusory allegations in this extremely long-winded complaint.” *Rhodes’
18 Motion #14, Page 5, Line 18*
- 19 • “Campbell provides a laundry list of complaints.” *Rhodes’ Motion #15, Page 9, Line 13*

20 **THE SCRIVENERS’ MISSPELLINGS AND GRAMMATICAL ERRORS**

21 4.26 It is notable that the 300 pages of Mr. Rhodes’ and the scriveners’ 17 motions
22 abound with misspellings and grammatical errors – notable that they brooked no time, effort, and
23 their Swedish Club defendants’ money in order to deliver hundreds of pages filled with zingers,
24 one liners, and scurrilous commentary about Ms. Campbell; while neglecting the form and
25 format of their missives:

- 26 • “For example, are all of these people/ to be liable for this clentities [sic] supposed to be
liable for this claim?” *Rhodes’ Motion #4, Page 3, Line 16*
- “Campbell’s claims are too incredibly [sic] to be believed.” *Rhodes’ Motion #8, Page 6,
Line 6*
- “In [sic] the Court should exercise its discretion to disregard Campbell’s evidence as ‘too
incredible to be believed.’” *Rhodes’ Motion #8 , Page 9, Line 6*
- “Campbell provides no evidence or law that board members should be [sic] for the acts of
third parties.” *Rhodes’ Motion #10, Page 3, Line 7*
- “It was a question, not a statement, and an objectively fair question since Campbell
admittedly was apologized [sic].” *Rhodes’ Motion #12, Page 3, Line 6*

- 1 • “Plaintiff’s [sic] cannot prove the following statements are false and not opinion.”
Rhodes’ Motion #12, Page 10, Line 12.
- 2 • Most of the conclusively [sic] allegations in this extremely long-winded complaint are
3 hearsay,” Motion #14 Page 5, Line 18-19
- 4 • “Pro se vexatious litigant Elizabeth Campbell’s 475 conspiratorial [sic] includes various
5 claims.” Rhodes’ Motion #15, Page 2, Line 9
- 6 • “Even less impressively, Campbell’s [sic] have no specific allegations against Alaimo in
7 them.” Rhodes’ Motion #15, Page 3 Line 17
- 8 • “It was a question, not a statement, and an objectively fair question since Campbell
9 admittedly was apologized [sic].” Rhodes’ Motion #12, Page 3, Line 6
- “In [sic] the Court should exercise its discretion to disregard Campbell’s evidence as ‘too
incredible to be believed.’” Motion #8, Page 9, Line 6.

**RHODES’ THREE WATCHWORDS, HIS SWEAR WORDS FOR MS. CAMPBELL –
PRO SE, VEXATIOUS, FRIVOLOUS**

11 4.27 Mr. Rhodes and the Mix Sanders scriveners missed no opportunity to lace their 17
12 motions with acid and opprobrium about Ms. Campbell, terms intended as they used them, to
13 describe and malign Ms. Campbell in pejorative terms – “pro se”, “vexatious”, and “frivolous”.
14 In their intent and vernacular they used them as they intended them, as swear words, liberally
15 used to literally tar and feather Ms. Campbell especially in the eyes of the Court. In sheer
16 numbers alone – “pro se” as a swear word term against Ms. Campbell was used over 31 times in
17 Rhodes’ 17 motions, “vexatious” was used by Rhodes in those same filings, *in addition to “pro*
18 *se,”* to malign Ms. Campbell over 34 times, and Rhodes’ other condemnatory descriptor of Ms.
19 Campbell, “frivolous,” was used by him over 16 times. All totaled – 81 instances where Ms.
20 Campbell’s name is besmirched, preceded, or linked to a slur against her.

21 4.28 A representative sample of the invective the Defendants have published to their
22 Swedish Club clients and in the Court record is as follows:

PRO SE and VEXATIOUS

- 24 • “DEFENDANTS’ MOTION TO DISMISS PLAINTIFF’S VEXATIOUS COMPLAINT
25 PURSUANT TO CR 8 AND JOINDER OF LANE POWELL’S MOTION TO
DISMISS” Rhodes’ Motion #1, 10 Pages
- 26 • “Vexatious litigant Elizabeth Campbell’s long-term strategy.” Rhodes’ Motion #3, Page 2,
Line 16

- 1 • “Dismissal is appropriate to deter this type of vexatious litigation.” *Rhodes’ Motion #x, Page 8, Line 20*
- 2 • “Pro se vexatious litigant Elizabeth Campbell filed a 476-page Amended Complaint.” *Rhodes’ Motion #4, Page 2, Line 9*
- 3 • “Pro se vexatious litigant Elizabeth Campbell sued everyone under the sun for breach of
- 4 contract.” *Rhodes’ Motion #6, Page 1, Line 9*
- 5 • “Pro se vexatious litigation [sic] Elizabeth Campbell ...brings a 476-page conspiratorial
- 6 Complaint.” *Rhodes’ Motion #7, Page 3, Line 4*
- 7 • “Pro se vexatious litigant Elizabeth Campbell is a threat to the Swedish Club,” *Rhodes’*
- 8 *Motion #8, Page 2, Line 9*
- 9 • “Pro se vexatious litigant Elizabeth Campbell’s 475 conspiratorial [sic] includes various
- 10 claims.” *Rhodes’ Motion #15, Page 2, Line 9*

9 FRIVOLOUS

10 4.29 Note: not to miss an opportunity, in order to double down and emphasize their
 11 contempt for Ms. Campbell, Rhodes and the scriveners even used the term “Frivolous” in the
 12 motion captions and the page captions – and emphasized it by underlining it:

- 13 • “Dismissal of Frivolous Claim for Paralegal Services/Fee Award(s)
- 14 • “Defendants were forced to file this motion to dismiss Campbell’s frivolous claim.” *Rhodes’ Motion #3, Page 4, Line 7*
- 15 Page captions are the same, “FRIVOLOUS” underlined:
- 16 • “DEFENDANTS’ MOTION TO DISMISS PLAINTIFF’S FRIVOLOUS
- 17 • CLAIM FOR PARALEGAL SERVICES/FEE AWARD(S)” *Rhodes’ Motion #3, 8 Pages*
- 18 • “Campbell’s claims against the SCF are frivolous.” *Rhodes’ Motion #5, Page 7, Line 9*
- 19 • “DEFENDANTS SUND, ALBRIGHT, EMERSON, ODDERSON, SMITH SNYDER,
- 20 JOHANSSON, FAINO, AND MILLER’S MOTION TO DISMISS PLAINIFF’S [SIC]
- 21 FRIVOLOUS NEGLIGENCE AND EMPLOYMENT CLAIMS” *Rhodes’ Motion #7, Page*
- 22 *Caption, 10 Pages*
- 23 • “DEFENDANT GARY SUND’S MOTION TO DISMISS CAMPBELL’S FRIVOLOUS
- 24 CLAIMS OF TORTIOUS INTERFERENCE WITH A CONTRACT, IIED, NIED,
- 25 INVASION OF PRIVACY, FALSE LIGHT, AND DEFAMATION“ *Rhodes’ Motion #9,*
- 26 *16 Pages*
- “DEFENDANT GARY SUND’S MOTION TO DISMISS CAMPBELL’S FRIVOLOUS
- CLAIMS OF TORTIOUS INTERFERENCE WITH A CONTRACT, IIED, NIED,
- INVASION OF PRIVACY, FALSE LIGHT, AND DEFAMATION” *Rhodes’ Motion #10,*
- 16 Pages*
- “DEFENDANT MOLLY OLSON SMITH’S MOTION TO DISMISS CAMPBELL’S
- FRIVOLOUS CLAIMS OF FALSE LIGHT, DEFAMATION, IIED, NIED, AND
- INTENTIONAL INTERFERENCE WITH A CONTRACTUAL RELATIONSHIP

1 CLAIMS” Rhodes’ Motion #12, Page 1, Line 9

2 **THE RANK HYPOCRISY OF RHODES AND HIS EXORBITANT LEGAL BILL**

3 4.30 Not content to let an opportunity pass to thoroughly castigate Ms. Campbell, Mr.
4 Rhodes takes great exception to her prayer for relief in her Swedish Club lawsuit wherein she
5 asks the Court for her costs and expenses incurred over a two plus year time period related to
6 drafting and processing her Swedish Club lawsuit. Mr. Rhodes howls in outrage:

7 “If there was ever a case not to extend fee awards to pro se paralegals, this would be
8 the one.

9 “Paralegals are not authorized to practice law; Campbell is not an attorney; she does not
10 work at a law firm and is not supervised by an attorney⁶; this amended complaint is
11 historically long and judicially wasteful, and the extraordinary amount for ‘paralegal
12 services’ at this stage in litigation demonstrates her intent to abuse the system for her own
13 pecuniary gain.” Rhodes’ Motion #3, Page 5 Line 13

14 4.31 Utterly lost on Mr. Rhodes is the irony of an attorney who has represented his
15 Swedish Club defendants for at best maybe three months, but in the process has managed to gin
16 up and improperly multiply his portion of the litigation pie to the level that his clients who
17 realistically are only at the earliest stages of litigation, Ms. Campbell is informed and believes
18 and upon information and belief alleges that Mr. Rhodes has incurred in billings for Mix Sanders
19 likely eight to ten times the amount Ms. Campbell has asked for for her costs.

20 4.32 Mr. Rhodes screams and objects to the pittance Ms. Campbell asked for, that is
21 based on her solitary and hard work endeavors, while Mr. Rhodes is charging the Swedish Club
22 \$320,000 to \$400,000 in Mix Sanders billings to generate what amounts to a massive number of
23 billable hours?

24 **CRAZY WOMAN SYNDROME –**
25 **THE MISOGYNISTIC TROPES OF RHODES ABOUT MS. CAMPBELL**

26 4.33 “This woman be crazy!” He didn’t have to say it – Mr. Rhodes implication in the
17 motions he filed, is no matter the circumstance, women, or bitches, in this case, will always

1 blow things out of proportion, or their “ravings” are just that – as Mr. Rhodes states about Ms.
2 Campbell, insane, not to be believed, incredible, delusional.

3 4.34 Mr. Rhodes, and no doubt his scribes, latched on to this outdated ideology
4 behind the hysterical woman. The crudeness of their quotes are barely watered down, but their
5 implementation of the hysterical woman tropes are still there – they stated them, published them,
6 made sure they were part of the Court record in the Swedish Club lawsuit - Ms. Campbell is
7 devalued and deemed by Mr. Rhodes as something she is not, framed by the “hysterical woman”
8 smear.

9 4.35 A few of the Defendants’ statements about Ms. Campbell:

- 10 • “Many causes of action are simply unhinged.” *Rhodes’ Motion #4, Page 3, Line 16*
- 11 • “Elizabeth Campbell ...brings a 476-page conspiratorial Complaint.” *Rhodes’ Motion #7,*
12 *Page 3, Line 4*
- 13 • “Omitted from Campbell’s rambling Complaint, however, are any facts.” *Rhodes’ Motion*
14 *#7,*
- 15 • “Campbell’s evidence as “too incredible to be believed.” *Rhodes’ Motion 8, Page 9, Line 6*
- 16 • “Campbell’s claims are too incredibly [sic] to be believed.” *Rhodes’ Motion #8, Page 6, Line*
17 *6*
- 18 • “Even less impressively, Campbell’s [claims] have no specific allegations against Alaimo
19 *in them.” Rhodes’ Motion #15, Page 3 Line 17*
- 20 • “Even assuming, purely for the sake of argument, that Norgren Terminated Campbell, if
21 *that happened in real life.” Rhodes’ Motion #14 Page 5, Line 1*
- 22 • “Campbell then provides a feigned description of what happened.” *Rhodes’ Motion #17,*
23 *Page 2, Line 21*
- 24 • “Campbell claims she left the room at one point.” *Rhodes’ Motion #17, Page 2, Line 8*
- 25 • “Campbell’s self-serving narrative, reasonable (sane) minds cannot differ.” *Rhodes’ Motion*
26 *#x, Page 5, Line 10*
- “Many are simply ‘you too’ claims or claims otherwise unsupported by Campbell’s
allegations.” *Rhodes’ Motion #15, Page 2, line 10*

4.36 Not content to just publish the derogatory and defamatory treatments about Ms.
Campbell in court filings as “the hysterical woman”, Mr. Rhodes especially took the opportunity
at the March 2024 Swedish Club members’ meeting to unequivocally inform the over 60 guests
in attendance that night that the lawsuit Ms. Campbell filed against the Club was full of lies, that

1 it was false. This despite the fact – that Ms. Campbell’s Complaint was verified, and that over
2 300 of the facts she presented in her pleadings were entirely footnoted, carefully sourced, cited
3 sources that established those facts – the majority based on the Swedish Club’s own records!

4 4.37 On April 11, 2024 Ms. Campbell asked Mr. Rhodes for a phone call appointment,
5 part of what she hoped to discuss was Mr. Rhodes’ defamation of her to the Swedish Club
6 members and employees. Mr. Rhodes declined.

7 4.38 On April 16th Mr. Rhodes requested a call from Ms. Campbell, that he billed as,
8 “Swedish Club Request for Discovery Conference.”² During the call Mr. Rhodes and Ms.
9 Campbell spent more time discussing their respective and personal local history than anything
10 case related. However, Ms. Campbell did bring up the matter of his defaming her in front of the
11 Swedish Club audience the month before. Mr. Rhodes laughed and dismissed Ms. Campbell’s
12 concerns.

13 4.39 Coincidentally, in later filings Mr. Rhodes certified that he had a substantive
14 discussion with Ms. Campbell that day, claiming that the real purpose of his call, unbeknownst to
15 Ms. Campbell, was to discuss his mass of motions to dismiss, summary judgment motions he
16 was planning on filing.

17 **RHODES’ BAD FAITH**

18 4.40 Ms. Campbell has come to believe that Mr. Rhodes deals in bad faith when it
19 comes to the Swedish Club lawsuit and her legal rights therein; and maybe even when it comes
20 to his Swedish Club clients’ interests therein.

21 **FURTHER MISOGYNY BY RHODES - DISMISSES VIOLENCE AGAINST AND** 22 **ABUSE OF WOMEN AS TRIVIALITIES, FODDER TO ASSERT HIS MALE** 23 **PRIVILEGE**

24 4.41 In the Swedish Club lawsuit Ms. Campbell made claims for assault, battery, and
25 damages related to some very ugly and aggressive behavior against Ms. Campbell by one of the
26 Swedish Club’s employees, and by its board vice president. The incidents were traumatic to Ms.

² Rhodes, Michael. “Swedish Club Request for Discovery Conference.” Email. April 11, 2024.

1 Campbell. The same person that is busy calling Ms. Campbell “crazy” above, has no problem
2 dismissing and recasting the very disturbing behaviors that were directed against Ms. Campbell
3 as of no moment – Mr. Rhodes reduced it to the always trite put down of women who have been
4 mistreated – the old “boys will be boys”, Ms. Campbell should just suck it up:

- 5 • “Any alleged conduct by Olson was within the normal bounds of society.” *Rhodes’ Motion #12, Page 7, Line 3*
- 6 • “STATEMENT OF ISSUES 1. Should the Court dismiss the above-mentioned claims
7 against Lucas...when reasonable minds cannot differ that Campbell is not entitled to
8 relief?” *Rhodes’ Motion #17, Page 2, Line 18*

8 **PEDANTRY OF RHODES**

9 4.42 There is no cause of action for pedantry but there should be one. A lack of
10 imagination and self awareness are certainly not illegal or actionable, but this representative and
11 exhausting list of the misuses by Mr. Rhodes of the “reasonable minds” axiom is particularly
12 odious. As used by Mr. Rhodes, his “reasonable minds cannot differ” jingle, this is just him
13 saying over and over – “I am so adroit and discerning that you cannot not possibly disagree with
14 my estimation and take on Ms. Campbell, about the falsity of her facts and allegations and the
15 worthlessness of her claims in her Swedish Club lawsuit.” Really.

16 4.43 Rather than a thoughtful treatise on the finer points of law we are ad infinitum
17 treated to the banal fodder and utterances of a Super Lawyer:

- 18 • “Reasonable minds cannot differ...” *Rhodes’ Motion #5, Page 6, Line 12*
- 19 • “Reasonable minds cannot differ...” *Rhodes’ Motion #5, Page 7, Line 7*
- 20 • “Reasonable minds cannot differ...” *Rhodes’ Motion #6, Page 5, Line 5*
- 21 • “reasonable minds cannot differ...” *Rhodes’ Motion #7, Page 10, Line 5*
- 22 • “Reasonable minds would agree...Norgren did nothing to contribute to a hostile work
23 environment for Campbell.” *Rhodes’ Motion #8, Page 9, Line 4*
- 24 • “Reasonable minds would agree that Norgren did nothing.” *Rhodes’ Motion #8, Page 11,
25 Line 4*
- 26 • “Reasonable minds cannot differ that Sund’s statements were opinions and political
speech.” *Rhodes’ Motion #9, Page 3, Line 2*
- “Reasonable minds cannot differ that Norgren did not commit the tort of outrage.”
Rhodes’ Motion #14, Page 5, Line 13

- 1 • “Reasonable minds cannot differ...” *Rhodes’ Motion #14, Page 5, Line 18*
- 2 • “Reasonable minds cannot differ...” *Rhodes’ Motion #14, Page 10, Line 4*
- 3 • “Reasonable minds cannot differ...” *Rhodes’ Motion #14, Page 11, Line 1*
- 4 • “Reasonable minds cannot differ...” *Rhodes’ Motion #15, Page 8, Line 8*
- 5 • “STATEMENT OF ISSUES 1. Should the Court dismiss the above-mentioned claims against Lucas...when reasonable minds cannot differ that Campbell is not entitled to relief?” *Rhodes’ Motion #17, Page 2, Line 18*
- 6 • “Campbell’s self-serving narrative, reasonable (sane) minds cannot differ.” *Rhodes’ Motion #x, Page 5, Line 10*
- 7 • “Reasonable minds cannot differ.” *Rhodes’ Motion #17, Page 7, Line 15*

8 **RHODES’ 17 SWEDISH CLUB MOTIONS - FOR AN IMPROPER PURPOSE:**

9 4.44 In the underlying Swedish Club lawsuit Mr. Rhodes has filed 17 motions and
 10 hundreds of pages of the above type of commentary, over half of which are not as he claims,
 11 “CR 8 and CR 12(b)(6) motions to dismiss. Half are motions for summary judgment, based on
 12 Mr. Rhodes’ false claims that there are no material facts in dispute between the parties.

13 4.45 However, upon closer examination there is another disturbing purpose Mr.
 14 Rhodes is also putting those motions towards - at least a third of the motions were filed for an
 15 improper purpose – to impugn and punish Ms. Campbell, and to rehabilitate the un-
 16 rehabilitatable reputation of Swedish Club executive director, Elizabeth Norgren:

- 17 • “This case is supported by analogous federal case law that summarily dismisses these types of Frankenstein complaints.”³
- 18 • “Dismissal is appropriate to deter this type of vexatious litigation.”⁴
- 19 • “Despite having nothing to do with Campbell, Norgren is now on the receiving end of vicious attacks and libel, in her Complaint and elsewhere. It needs to stop now!”⁵
- 20 • “This brief [motion] seeks to clear up the record and dismiss claims against Norgren to prevent further harassment.”⁶
- 21 • “Norgren seeks dismissal of Campbell’s claims against her to prevent Campbell’s continued harassment of her.”⁷

24 _____
 25 ³ Rhodes’ Motion #1, Page 2, Line 20

26 ⁴ Rhode’s Motion #1, Page 8, Line 20

⁵ Rhode’s Motion # 8, Page 2, Line 19.

⁶ Rhodes Motion #9, Page x, Line x

⁷ Rhodes’ Motion #8, Page 5, Line 18

- “The proposed scope of Campbell’s lawsuit is an abuse of the court system.”⁸

**DEFAMATION *PER SE* OF MS. CAMPBELL: RHODES’ AND HIS SCRIVENERS’
ACCUSATIONS OF EXTORTION AGAINST MS. CAMPBELL**

4.46 In addition to branding Ms. Campbell crazy and a liar, Mr. Rhodes and his workers crafted an even more appalling narrative about Ms. Campbell – that over the course of several years she dreamed up, schemed, and carried out an extortionate scheme against the Swedish Club and the Swedish Club lawsuit defendants:

4.47 Rhodes’ Extortion Reference #1

“This is the first of multiple motions to dismiss – which will demonstrate that many of Campbell’s claims fail to state a claim and appear calculated to shakedown or otherwise harass the entities/persons named as Defendants.”⁹

4.48 Rhodes’ Extortion Reference #2

“Vexatious litigant Elizabeth Campbell’s long-term strategy:

- 1) infiltrate Swedish Club in 2020,
- 2) self-narrate perceived grievances,
- 3) obtain paralegal certificate in 2021,
- 4) prepare one of the longest Amended Complaints in US history,
- 5) demand money for paralegal services (so far \$41,514.33¹).”¹⁰

4.49 Rhodes’ Extortion Reference #3

“The moving defendants request dismissal of Campbell’s claim...to avoid shakedowns like this one.”¹¹

4.50 Rhodes’ Extortion Reference #4

“Campbell’s Bold Set Up And Attempted Shakedown

“In the dystopian summer of 2020, Campbell negotiated an agreement to volunteer at the Swedish Club, in exchange for membership.

“The following year, she allegedly obtained an ‘Advanced Paralegal Certificate’ from Edmonds College.

“Now in 2024, Campbell seeks to shake down the Swedish Club with a historically lengthy and

⁸ Rhodes’ Motion #8, Page 5, Line 20

⁹ Rhode’s Motion #1, Page 3, Line 20

¹⁰ Rhodes’ Motion #3, Page 2, Line 12

¹¹ Rhodes’ Motion #3, Page 2, Line 16

1 tedious complaint (476 pages) that demands her *pro se* paralegal fees/services.”¹²

2 **4.51 Rhodes’ Extortion Reference #5**

3 “This amended complaint is historically long and judicially wasteful, and the extraordinary
4 amount for ‘paralegal services’ at this stage in litigation demonstrates her intent to abuse the
5 system for her own pecuniary gain.”¹³

6 **4.52 Rhodes’ Extortion Reference #6**

7 “Pro se vexatious litigant Elizabeth Campbell is a threat to the Swedish Club...and all who are
8 wrapped into her sprawling lawsuits.”¹⁴

9 4.53 It is no accident, by definition the use of the word “shakedown” was leveled and
10 used by Mr. Rhodes and as the defendant scriveners intended it, as a scurrilous and defamatory
11 pronouncement by them against Ms. Campbell.

12 4.54 The dictionary definition of “Shakedown” or “Shake-down” is:

13 “:extortion, as by blackmail or threats of violence.”¹⁵

14 “:an act or instance of shaking someone down, especially EXTORTION”¹⁶

15 “:A shakedown is an illegal or deceitful attempt to get money from someone, for example by
16 swindling or blackmailing them.”¹⁷

17 4.55 According to the lowest charge of “extortion” in Washington state,

18 “RCW 9A.56.110 Extortion—Definition. "Extortion" means knowingly to obtain or attempt to
19 obtain by threat property or services of the owner, and specifically includes sexual favors”; and

20 “RCW 9A.56.130 Extortion in the second degree. (1) A person is guilty of extortion in the
21 second degree if he or she commits extortion by means of a wrongful threat as defined in

22 RCW 9A.04.110(28) (d) through (j). (2) In any prosecution under this section based on a threat
23 to accuse any person of a crime or cause criminal charges to be instituted against any person, it is
24 a defense that the actor reasonably believed the threatened criminal charge to be true and that his

25 ¹² Rhodes Motion #3, Page 3, Line 10

26 ¹³ Rhodes’ Motion #3, Page 5 Line 13

¹⁴ Rhodes’ Motion #8, Page 2, Line 9

¹⁵ <https://www.dictionary.com/browse/shakedown>

¹⁶ <https://www.merriam-webster.com/dictionary/shakedown>

¹⁷ <https://www.collinsdictionary.com/us/dictionary/english/shakedown#:~:text=A%20shakedown%20is%20an%20illegal,by%20swindling%20or%20blackmailing%20them.>

1 or her sole purpose was to compel or induce the person threatened to take reasonable action to
2 make good the wrong which was the subject of such threatened criminal charge. (3) Extortion in
3 the second degree is a class C felony.” and, “RCW 9A.20.021 Maximum sentences for crimes
4 committed July 1, 1984, and after. (1) Felony. Unless a different maximum sentence for a
5 classified felony is specifically established by a statute of this state, no person convicted of a
6 classified felony shall be punished by confinement or fine exceeding the following: (c) For a
7 class C felony, by confinement in a state correctional institution for five years, or by a fine in an
8 amount fixed by the court of ten thousand dollars, or by both such confinement and fine.”

9 4.56 Mr. Rhodes’ and the scriveners’ commentary, false accusations, scurrilous
10 statements in the Swedish Club’s motions that Ms. Campbell is an extortionist are hardly the
11 sniggling, smug, and clever legal adversarial advocacy statements protected by privilege, that
12 they will no doubt claim their work to be.

13 **WORDS, AND DEEDS, HAVE CONSEQUENCES.**

14 4.57 The Swedish Club lawsuit defendants, Mr. Rhodes’, and the scriveners’ seventeen
15 motions with the insults, the derogatory and dismissive references made about Ms. Campbell,
16 along with their complete fictions including that Ms. Campbell is a liar, crazy, that she should be
17 punished, and is an extortioner, are a fraud filed with the King County Superior Court.

18 4.58 All of Mr. Rhodes’ and his scriveners’ acts and written output that they published
19 has been intentional and designed to humiliate Ms. Campbell and intimidate her into
20 withdrawing her legal, proper, and valid Swedish Club lawsuit, and to forego her claims against
21 the Swedish Club, its key employees, and its board of directors for the intentional and negligent
22 wrongs they have carried out against Ms. Campbell.

23 4.59 A false accusation of criminal wrongdoing generally amounts to defamation, and
24 may also give rise to claims for mental and emotional distress. False accusations may be subject
25 to the litigation privilege if made in the course of litigation brought and prosecuted in good faith,
26

1 or in statements made about judicial proceedings. But there is nothing magical about packaging
2 lies in a court filing.

3 4.60 Statements “are absolutely privileged if they are pertinent or material to the
4 redress or relief sought, whether or not the statements are legally sufficient to obtain that relief.”
5 *McNeal v. Allen*, 95 Wn.2d 265, 267, 621 P.2d 1285 (1980). But statements having “ ‘no
6 connection whatever’ ” with the litigation are not privileged. *Demopolis v. Peoples Nat. Bank of*
7 *Wash.*, 59 Wn. App. 105, 110, 796 P.2d 426 (1990) (quoting RESTATEMENT (SECOND) OF
8 TORTS, § 586, comment c (AM. LAW INST. (1977))). Thus, not every passing statement made
9 in court avoids liability.

10 4.61 Furthermore, a “sham pleading”—a sham complaint, or answer, or other
11 statement about litigation—does not protect the lies it contains from being actionable. Under the
12 sham pleading doctrine, a defamation claim may lie based on claims made in litigation, for
13 example, “where the underlying lawsuit was a sham action brought solely to defame the
14 defendant.” *Flomenhaft v. Finkelstein*, 127 A.D.3d 634, 638 (1st Dep’t 2015); see *Williams v.*
15 *Williams*, 23 N.Y.2d 592, 596 (1969).

16 4.62 A defamation claim based on the sham pleading doctrine is actionable against
17 both the defendants in the underlying Swedish Club lawsuit *and* their attorneys. See, e.g.,
18 *Flomenhaft*, 127 A.D.3d at 634, 639; *Halperin v. Salvan*, 117 A.D.2d 546 (1st Dep’t 1986).
19 Emphasis added.....

20 **V. CAUSES OF ACTION**
21 **1. CAUSE OF ACTION - DEFAMATION PER SE**
22 *Against All Defendants*

23 5.1 Ms. Campbell incorporates all of the above allegations as if they were fully stated
24 here.

25 5.2 Michael Rhodes has publicly accused Ms. Campbell of lying, committing perjury
26 in her complaint, and being an extortioner, knowing that those accusations were false, and did so

1 with the intent to cause Ms. Campbell severe reputational, social and professional, and economic
2 harm.

3 5.3 Aware of Mr. Rhodes', Mix Sanders', the scriveners', John and Jane Does 1 to 5's
4 lies also wrote and published their false constructs and slurs against Ms. Campbell in court
5 filings that promoted Ms. Rhodes' lies, their lies, that Ms. Campbell had lied, *and* that Ms.
6 Campbell had been engaged in a criminal, extortion scheme against the Swedish Club over
7 several years even.

8 5.4 These continued lies and slurs by Mr. Rhodes and his helpers, "the scriveners",
9 Ms. Greenwood and Ms. Knapp, that Ms. Campbell was a liar, a crazy woman, and an
10 extortioner were written, spoken, and intended to cause Ms. Campbell reputational, social and
11 professional, and economic harm.

12 5.5 Mr. Rhodes', Mix Sanders, Thompson PLLC's pleadings filed on behalf of their
13 clients, Swedish Club lawsuit defendants were in whole or in part shams – platforms that Mr.
14 Rhodes and Mix Sanders used to file pleadings they had written that had no basis in fact and
15 included in them defamatory and libelous statements about Ms. Campbell, that were made (i)
16 without any good faith basis, (ii) without conducting anything akin to a remotely adequate
17 investigation (if any investigation was done at all), (iii) in direct defiance and conscious
18 disregard of contemporaneous documentary evidence, (iv) in bad faith and with malice, and (v)
19 with the sole purpose of causing Ms. Campbell severe reputational, social and professional, and
20 economic harm; and to intimidate her into withdrawing her lawsuit against the Swedish Club and
21 its co-defendants.

22 5.6 Mr. Rhodes, Mix Sanders PLLC, filed their 17 motions/complaints on behalf of
23 the Swedish Club defendants and in coordination with their employees or agents not because
24 they had a good faith basis to reasonably believe that their clients had any passably legitimate
25 claims for redress against Ms. Campbell's Swedish Club lawsuit, but because they wanted to
26 publicize and disseminate lurid, scandalous and calumnious accusations about Ms. Campbell and

1 intimidate her into withdrawing her Swedish Club lawsuit, and cause her as much pain in the
2 process as possible.

3 5.7 With each public statement, with each court filed pleading, Mr. Rhodes, Mix
4 Sanders, Ms. Knapp, Ms. Greenwood, and John Does 1 and 2 communicated the substance of
5 their filings to others, not just their Swedish Club defendant clients. On information and belief,
6 John and Jane Does 1-5 actively encouraged and supported these actions.

7 5.8 Defendants are in no way entitled to any protections, immunities, or privileges
8 with respect to the allegations in their Swedish Club lawsuit motions because those filings were
9 made for the purpose of attempting to cloak the allegations against Ms. Campbell in them with
10 the appearance of such protections, immunities, or privileges.

11 5.9 In addition, the allegations in the motions were not in any way made in
12 furtherance of any bona fide litigation objective, they were intended to smear Ms. Campbell in
13 the Court's eyes, in the eyes of others, to gratify the arrogant impulses and interests of Mr.
14 Rhodes, Mix Sanders, Ms. Greenwood, Ms. Knapp, and John and Jane Does 1-5, and in the
15 process glorify Mr. Rhodes and Mix Sanders in the eyes of the Swedish Club defendants.

16 5.10 The personal statements and allegations in the Mr. Rhodes'/Mix Sanders' motions
17 are intended to be and are written in an especially defamatory and libelous manner, but purported
18 to be fact concerning Ms. Campbell. However as has been shown above, the representations of
19 Ms. Campbell therein were and are utterly false, as conclusively shown by contemporaneous
20 documentary evidence that Mr. Rhodes and Mix Sanders never even meaningfully attempted to
21 obtain, much less rebut – they, and their perjured declaration wrote and stood/stand by what they
22 wrote about Ms. Campbell.

23 5.11 The allegations in the Mix Sanders' motions about Ms. Campbell being an
24 extortioner, engaging in criminal acts, amounts to defamation and libel per se under the law as
25 they are direct attacks on Ms. Campbell's social and professional and personal reputation, and
26 thus damages are presumed.

1 5.12 The allegations in the complaints amount to defamation and libel per se under the
2 law as they allege that Ms. Campbell committed serious crimes, including harassment, extortion,
3 and perjury, and thus damages are presumed.

4 5.13 The defamatory statements in Defendants’ pleadings include, but are not limited
5 to, that Ms. Campbell:

- 6 • “This is the first of multiple motions to dismiss – which will demonstrate that many of
7 Campbell’s claims fail to state a claim and appear calculated to shakedown or otherwise
8 harass the entities/persons named as Defendants.”¹⁸
- 9 • “Omitted from Campbell’s rambling Complaint, however, are any facts.” *Rhodes’ Motion*
10 #7,
- 11 • “Campbell’s claims are too incredibly [sic] to be believed.” *Rhodes’ Motion #8, Page 6, Line*
12 6
- 13 • “Even assuming, purely for the sake of argument, that Norgren Terminated Campbell, if
14 that happened in real life.” *Rhodes’ Motion #14 Page 5, Line 1*
- 15 • “Campbell then provides a feigned description of what happened.” *Rhodes’ Motion #17,*
16 *Page 2, Line 21*
- 17 • “Now in 2024, Campbell seeks to shake down the Swedish Club with a historically
18 lengthy and tedious complaint (476 pages) that demands her pro se paralegal
19 fees/services.”¹⁹

20 5.14 Defendant Rhodes’ in-person statements to the Swedish Club members and in
21 Rhodes’ and Mix Sanders’ court filings also amount to defamation and libel per se under the law
22 as they allege that Ms. Campbell committed serious crimes, including perjury and extortion, and
23 thus damages are presumed. These allegations include, but are not limited to, Mr. Rhodes’
24 statements in person and in his motions that Ms. Campbell’s verified complaint complains
25 mostly if not all false statements.

26 5.15 Mr. Rhodes’ allegations against Ms. Campbell in public and in the pleadings were
published without privilege or authorization to a third party.

 5.16 In making and publishing those defamatory and libelous allegations, and
repeating those lies to the Swedish Club members and the public, the Defendants wrongfully and

¹⁸ Rhode’s Motion #1, Page 3, Line 20

¹⁹ Rhodes Motion #3, Page 3, Line 10

1 willfully intended by such publication to injure Ms. Campbell's personal, social, employment,
2 and business reputation.

3 5.17 At the time Defendants uttered and caused to be published the defamatory and
4 libelous matter set out above, Defendants acted with actual malice because they knew the
5 allegations in the pleadings were false or, in the alternative, they failed to take any reasonable
6 steps to ascertain the accuracy of the allegations and instead published them with reckless or
7 grossly negligent disregard for whether they were true or not.

8 5.18 As a direct result of the foregoing defamatory and libelous statements, in
9 Defendants' sham pleadings and to the Swedish Club members, Ms. Campbell has suffered
10 injury to her personal and work, and social reputations.

11 5.19 Ms. Campbell has suffered damages as a proximate result of Defendants' conduct
12 as alleged herein in an amount which is now unknown, but which will be proved at the time of
13 trial.

14 5.20 In addition, because of the wanton, willful, and malicious nature of the foregoing
15 wrongful conduct, Ms. Campbell is also entitled to recover punitive damages.


16 **VI. RELIEF REQUESTED**

17 WHEREFORE, Plaintiff Elizabeth A. Campbell hereby requests judgment against
18 Defendants Michael K. Rhodes, Jennifer Knapp, Leyda Greenwood, Mix Sanders Thompson
19 PLLC, and John and Jane Does 1 to 5 as follows:

- 20 a) Enter judgment on the claims in Ms. Campbell's favor;
- 21 b) Award Ms. Campbell damages, in an amount to be determined at trial, plus prejudgment
22 interest, to compensate Ms. Campbell for all monetary and/or economic damages;
- 23 c) Award Ms. Campbell damages for any and all other monetary and/or non-monetary
24 losses suffered by her, including, but not limited to, loss of income, reputational harm and
25 harm to social and professional reputation, in an amount to be determined at trial, plus
26 prejudgment interest;

- 1 d) Award punitive damages for the Defendants' gross wanton, malicious, and outrageous
2 misconduct in an amount to be determined at trial;
3 e) Award Ms. Campbell treble damages;
4 f) Award attorneys' fees, costs, and disbursements incurred as a result of this action; and
5 g) Award such other, further, and different relief as the Court may deem just and
6 proper.

7 DATED this 15th Day of May, 2024
8

9 
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