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

ELIZABETH A. CAMPBELL, an individual,
Plaintiff,
vs.
SHARON LUCAS, an individual, et al.,
Defendants.

No. 23-2-25195-4 SEA

**PLAINTIFF ELIZABETH A.
CAMPBELL’S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION
PROPOUNDED TO DEFENDANT
LANGDON MILLER**

TO: LANGDON MILLER, Defendant

In accordance with Washington Superior Court Rules 26 and 33, please answer each of the following interrogatories separately, fully, in writing and under oath. Each answer must be as complete and straightforward as the information reasonably available to you permits after reasonable inquiry, including the information possessed by your attorneys or agents. If an interrogatory cannot be answered completely, answer it to the extent possible.

The answers are to be signed by the person to whom they are addressed and must be served on all parties within thirty (30) days after the service of the interrogatories. NOTE: Answers must be compliant with the Civil Rules, Local Rules, and Washington State case law, including the duty set forth in CR 26(e).

DEFINITIONS

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

1. **“DOCUMENTS”** means all hard copy and electronic writings of every kind including, but not limited to, the original and any copy of all records, e-mails, letters, correspondence, appointment books, diaries, files, notes, statements, memoranda, or minutes of meetings,

1 photographs, video, conferences, telephone calls, receipts, written reports or opinions of
2 investigators or experts, status reports, financial statements, audit reports, tax returns, estimates,
3 inventories, contracts, agreements, articles of incorporation, bylaws, stock book, minute book,
4 deed, security agreement, mortgage, deed of trust, title or other insurance policy, report, record,
5 study, hand written note, map, drawing, working paper, chart, paper, draft, index, tape,
6 microfilm, data sheet, data processing card, computer printout, computer program, check, bank
7 statement, passbook, including information recorded and stored electronically, however
8 produced or reproduced, within your possession or subject to your control, of which you have
9 knowledge or to which you have or have had access, or of which any of your agents, attorneys,
10 accountants or consultants have had knowledge.

11 2. **“IDENTIFY”- Individuals.** When used in reference to an individual person, means to
12 state his or her name, including aliases or former names and **CONTACT INFORMATION** as
13 defined below.

14 3. **“IDENTIFY”- Entity.** When used with reference to an entity, such as a partnership
15 (either general or limited), joint venture, trust or corporation, to state the full legal name of such
16 entity, each name under which such entity does business, the entity’s telephone number and the
17 identity of the chief operating officer, manager, trustee, or other principal representative.

18 4. **“IDENTIFY”- Documents.** When used in reference to a document, means the date of
19 preparation of the document, its author, the sender, the recipient, the nature of the document,
20 e.g., letter, memo, tape, or other means of identification sufficient to identify the document, and
21 its present location and custodian. Provide the name, address, and telephone number of the
22 person with possession of the document.

23 5. **“IDENTIFY”- Claims/Lawsuits.** When used in reference to claims or lawsuits means the
24 **CONTACT INFORMATION** of parties and attorneys representing the parties, proceeding
number(s), jurisdiction, type of action, and disposition.

1 **“PERSON”** includes a natural person, company, firm, association, organization,
partnership, business, trust, limited liability company, corporation, or public entity.

2 **“YOU”** or **“YOUR”** means the party to whom these interrogatories are addressed, your
attorneys, agents, employees, officers, representatives, adjusters, investigators, and any other
“person” who is in possession of information on your behalf.

3 **“CONTACT INFORMATION”** means full legal name, nickname(s), current physical
address, addresses for the past 10 years (residential if a person; business if a company), dates at
each address, e-mail address(es), and current phone numbers (work, mobile, fax).

4 **“EMPLOYMENT HISTORY”** means the name of your employer or business, title, job
description including nature of work/duties and responsibilities, the dates of employment
including starting and ending rate of pay for each position, **CONTACT INFORMATION** for
your immediate supervisor, and reason for leaving if no longer in that position.

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1 Dated this 15th day of April, 2024

2 ELIZABETH A. CAMPBELL, MPA

3 

4 Elizabeth A. Campbell, MPA

5 Plaintiff Pro Se

6 3826 24th Ave W

7 Seattle, WA 98199

8 Tel/Text: 206-769-8459

9 Fax: 206-283-6300

10 neighborhoodwarrior@gmail.com

11 **INTERROGATORIES**

12 **INTERROGATORY NO. 1.:** Identify each **PERSON** (excluding your attorney) who
13 provided you with information which enabled you to respond to this Interrogatory.

14 **ANSWER:**

15 **INTERROGATORY NO. 2.:** With respect to the allegations contained within paragraphs
16 5.1 through 5.976 of Plaintiff's *First Amended Complaint*, please identify with specificity the
17 following:

- 18 a) All facts which refute such claims;
19 b) All facts which support such claims;
20 c) **CONTACT INFORMATION** for all **PERSONS** with knowledge of such claims; and
21 d) **IDENTIFY** all **DOCUMENTS** relied upon by **YOU** to support such claims.
22 e) **IDENTIFY** the custodian of each of those **DOCUMENTS**.

23 **ANSWER:**

24 **INTERROGATORY NO. 3.:** Please provide the **CONTACT INFORMATION** for any
PERSON, other than any attorneys, who investigated, was an eyewitness to, or has knowledge
of the facts and circumstances of the Plaintiff's claims or damages asserted in their *First
Amended Complaint*. For each such **PERSON**, please provide a brief description of the
PERSON'S knowledge and their relationship to the case.

1 **ANSWER:**

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4 **INTERROGATORY NO. 4.:** Please provide the **CONTACT INFORMATION** for any

5 **PERSON** who made any written and/or recorded statements relating to the Plaintiff's claims in

6 their *First Amended Complaint* and, for each statement, please **IDENTIFY** the form of the

7 statement (e.g., written, recorded, transcribed, etc.) and **CONTACT INFORMATION** for the

8 present custodian.

9 **ANSWER:**

10 **INTERROGATORY NO. 5.:** Please provide the **CONTACT INFORMATION** for any

11 **PERSON** who made any written and/or recorded statements about or relating to the Plaintiff,

12 Elizabeth Campbell, and, for each statement, please **IDENTIFY** the form of the statement (e.g.,

13 written, recorded, transcribed, etc.) and **CONTACT INFORMATION** for the present

14 custodian.

15 **ANSWER:**

16 **INTERROGATORY NO. 6.:** 2. Did the Plaintiff, Elizabeth Campbell complain or give

17 notice to YOU to any other PERSON about the unlawful conduct or about the tortious conduct

18 alleged by the Plaintiff in the First Amended Complaint? If so, for each complaint or notice

19 given:

- 20 a. State the date of the complaint or notice given;
- 21 b. State the nature of the complaint or notice given;
- 22 c. State the name and **CONTACT INFORMATION** of each **PERSON** in addition to
- 23 **YOURSELF** to whom the complaint was made or notice was given to;
- 24 d. State the **CONTACT INFORMATION**, and any job title of each **PERSON** who
- participated in making decisions about how to conduct the investigation;
- e. state the **CONTACT INFORMATION**, and job title of each PERSON who was
- interviewed or who provided an oral or written statement as part of the investigation
- of the complaint or notice;
- f. state the nature and date of any action taken in response to the complaint or notice;
- g. state whether the Plaintiff was made aware of the actions taken by the Swedish Club,
- by the Swedish Club Board of Directors, or by YOU in response to complaint(s) or
- notice(s), and, if so, state how and when;

- 1 h. identify all **DOCUMENTS** relating to the complaint(s) or notice(s) made by the
2 Plaintiff, the investigation(s), and any action(s) taken in response to the complaint(s)
3 or notice(s); and state the and their **CONTACT INFORMATION** who has
4 knowledge of the Plaintiff's complaint(s) or notice(s), and/or of the Swedish Club's
5 or the Swedish Club Board of Director's, or **YOUR** response(s) to the complaint or
6 notice given.

7 **ANSWER:**

8 **INTERROGATORY NO. 7.: IDENTIFY** the date, time, type (e.g., letter, telephone call),
9 witnesses to or participants in, and the substance of each contact with a **PERSON** other than
10 Plaintiff made in connection with the Plaintiff's claims in the *First Amended Complaint*.

- 11 a. **IDENTIFY** each **DOCUMENT**, record, recording and **PERSON** furnishing
12 information with regard to your response to the immediately preceding
13 Interrogatory.

14 **ANSWER:**

15 **INTERROGATORY NO. 8.: IDENTIFY** each **PERSON**, including **YOURSELF**, with
16 whom you are aware that:

- 17 a. Witnessed the incident or the events occurring immediately before, during, or after the
18 incident the Plaintiff has complained of that occurred on the evening of April 20, 2022
19 during the annual members' meeting in the dining room of the Swedish Club;
20 b. And/or who heard any statement(s) made about the incident by any individual at the
21 scene.

22 **ANSWER:**

23 **INTERROGATORY NO. 9.: IDENTIFY** each employee, board member, or Swedish Club
24 member with personal knowledge of the April 20, 2022 incident.

- a. For each such individual, provide their **CONTACT INFORMATION**, and identify his
or her job/board member title and job or function which was being performed by that
individual at the time of the incident.

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INTERROGATORY NO. 10.: IDENTIFY each **PERSON**, including **YOURSELF**, that was interviewed concerning the April 20, 2022 incident? For each such **PERSON**, state:

- a. The date of the interview.
- b. Who conducted the interview.
- c. The substance of the interview.
- d. The holder of the interview related records.

Note: If the interview was recorded and/or transcribed, a reproduction of the recording and/or transcript will suffice.

- e. **IDENTIFY** any **DOCUMENTS** provided to the interviewee, provided to the interviewer by the interviewee, or otherwise present or used in the interview.
- f. **IDENTIFY** any **PERSON** that is the custodian of the **DOCUMENTS** identified in part “d.” above.

ANSWER:

INTERROGATORY NO. 11.: IDENTIFY each and every verbal or written report made by **YOU** or any **PERSON** concerning the April 20, 2022 incident; for each report:

- a. **IDENTIFY** the date the report was made;
- b. **IDENTIFY** who the report was given to and the date they received it;
- c. **IDENTIFY** the current custodian of the report and their **CONTACT INFORMATION**.

ANSWER:

INTERROGATORY NO. 12.: Please state, in **YOUR** own words, what **YOU** believe happened on the evening of Wednesday, April 20, 2022 incident during the Swedish Club’s annual members’ meeting in the dining room of the Swedish Club and include in **YOUR** Answer the basis upon which **YOU** have formed that belief; and **IDENTIFY** any **DOCUMENTS** you have created or relied upon to form that belief.

ANSWER:

1 **INTERROGATORY NO. 13.:** Identify each **PERSON**, including **YOURSELF**, with
whom **YOU** are aware that:

- 2 a. Witnessed the incident or the events occurring immediately before, during, or after the
incident the Plaintiff has complained of that occurred on the evening of March 1, 2023
3 during the board meeting in the library of the Swedish Club.
4 b. And/or who heard any statement(s) made about the incident by any individual at the
scene.

5 **ANSWER:**

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8 **INTERROGATORY NO. 14.:** Identify each **PERSON**, Swedish Club employee, board
member, or member with personal knowledge of the March 1, 2023 incident.

- 9 a. For each such individual, provide their **CONTACT INFORMATION** and identify his
or her job/board member title and job or function which was being performed by that
individual at the time of the incident.

10 **ANSWER:**

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13 **INTERROGATORY NO. 15.:** **IDENTIFY** each **PERSON**, including **YOURSELF**, that
was interviewed concerning the March 1, 2023 incident? For each such person, state:

- 14 a. The date of the interview.
15 b. Who conducted the interview.
16 c. The substance of the interview.
17 d. The holder of the interview related records.

Note: If the interview was recorded and/or transcribed, a reproduction of the recording and/or
transcript will suffice.

- 18 e. **IDENTIFY** any **DOCUMENTS** provided to the interviewee, provided to the
interviewer by the interviewee, or otherwise present or used in the interview.
19 f. **IDENTIFY** any **PERSON** that is the custodian of the **DOCUMENTS** identified in part
“d.” above.

20 **ANSWER:**

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23 **INTERROGATORY NO. 16.:** **IDENTIFY** each and every verbal or written report made
by **YOU** or any **PERSON** concerning the March 1, 2023 incident; for each report:

- 24 a. **IDENTIFY** the date the report was made;

- 1 b. **IDENTIFY** who the report was given to and the date they received it;
2 c. **IDENTIFY** the current custodian of the report and their **CONTACT**
3 **INFORMATION.** .

4 **ANSWER:**

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6 **INTERROGATORY NO. 17.:** Please state, in **YOUR** own words, what you believe
7 happened on the evening of Wednesday, March 1, 2023 incident during the Swedish Club's
8 board of directors' meeting in the library of the Swedish Club and include in **YOUR** Answer
9 the basis upon which you have formed that belief; and **IDENTIFY** any **DOCUMENTS** you
10 have created or relied upon to form that belief

11 **ANSWER:**

12 **INTERROGATORY NO. 18.:** **IDENTIFY** any warnings, whether verbal or written (such
13 as by a sign, or otherwise) which were given to the Plaintiff as a member or as an employee at
14 any time during the years 2021, 2022, and 2023, specifically, and/or in general, before either of
15 the incidents of April 20, 2022 and March 1, 2023 occurred. For each warning given:

- 16 a. **IDENTIFY** the **PERSON(S)** with knowledge of the warning(s);
17 b. If in writing, **IDENTIFY** the **PERSON(S)** who authored the **DOCUMENT**;
18 c. **IDENTIFY** the current custodian of the warning **DOCUMENT(S)** and any
19 **DOCUMENTS** related thereto.

20 **ANSWER:**

21 **INTERROGATORY NO. 19.:** **IDENTIFY** any warnings, whether verbal or written (such
22 as by a sign, or otherwise) which were given to any employee or member at any time during the
23 years 2021, 2022, and 2023, specifically, and/or in general, for each warning given:

- 24 a. **IDENTIFY** the **PERSON(S)** with knowledge of the warning(s);
b. If in writing, **IDENTIFY** the **PERSON(S)** who authored the **DOCUMENT**;
c. **IDENTIFY** the current custodian of the warning **DOCUMENT(S)** and any
DOCUMENTS related thereto.

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INTERROGATORY NO. 20.: Describe in detail any conversations **YOU** or any Swedish Club board member, member, employee, or agent/representative has had with the Plaintiff prior to or following the April 20, 2022 and March 1, 2023 incidents in question.

ANSWER:

INTERROGATORY NO. 21.: **IDENTIFY** any admission(s) or declaration(s) against interest which **YOU** contend was made by the Plaintiff following the April 20, 2022 and March 1, 2023 incidents in question.

INTERROGATORY NO. 22.: **IDENTIFY** each and every verbal or written statement made by **YOU** or any **PERSON** concerning Elizabeth Campbell, wherein the **PERSON** stated if Elizabeth Campbell were to return to the Swedish Club as a member or as an employee they would quit being an employee or resign as member, not return to the Swedish Club; for each statement

- a. **IDENTIFY** the date the statement was made;
- b. **IDENTIFY** who made the statement;
- c. **IDENTIFY** who received or heard the statement;
- d. If the statement was made in writing, **IDENTIFY** the current custodian of the statement **DOCUMENT** and their **CONTACT INFORMATION**. .

ANSWER:

INTERROGATORY NO. 23.: **IDENTIFY** each and every verbal or written statement made by **YOU** or any **PERSON** concerning Elizabeth Campbell regarding her work as a Swedish Club employee, her membership in the Swedish Club, or about Ms. Campbell's personal life, her relationships, her work or community history of activism, for each statement:

- a. **IDENTIFY** the date the statement was made;
- b. **IDENTIFY** who made the statement;
- c. **IDENTIFY** who received or heard the statement;

1 d. If the statement was made in writing, **IDENTIFY** the current custodian of the statement
2 **DOCUMENT** and their **CONTACT INFORMATION**. .

3 **ANSWER:**

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5 **INTERROGATORY NO. 24.: IDENTIFY** any notices that **YOU** or anyone else on the
6 Swedish Club’s board of directors or employed by the Swedish Club have given to any of the
7 Swedish Club’s insurers regarding the Plaintiff’s claims. For any claim made to an insurer:

- 8 a. **IDENTIFY** and describe each claim made under each liability insurance policy in the
9 years 2021, 2022, 2023, and 2024;
10 b. The date of claim, the claim number;
11 c. The subject of the claim, the status of the claim
12 d. The resolution of the claim; and
13 e. Any amounts paid under each policy.

14 **ANSWER:**

15 **INTERROGATORY NO. 25.: IDENTIFY** any insurance agreement(s) under which any
16 insurance business may be liable to satisfy part or all of any judgment which may be entered in
17 this action, or to indemnify or reimburse **YOU** or the Swedish Club for payments made to
18 satisfy an adverse judgment in this matter, including in **YOUR** answer the amount and limits of
19 any such liability insurance coverage.

20 **ANSWER:**

21 **INTERROGATORY NO. 26.: IDENTIFY** with specificity each and every source of funds
22 or funding that would have been used to pay each of the settlement offers made by the Swedish
23 Club to Elizabeth Campbell.

24 **INTERROGATORY NO. 27.:** Describe in detail any conversation **YOU** or **PERSON** or
any Swedish Club board member, member, employee, or agent/representative has had wherein
the belief was discussed that settling with the Plaintiff in King County Superior Court Case No.
23-2-25195-4 SEA would bankrupt the Swedish Club, for each conversation:

1 **IDENTIFY** the time, date, and place the conversation took place;
2 **IDENTIFY** the name of who the participants in the conversation where;
3 **IDENTIFY** any **DOCUMENTS** used or circulated during those conversations that were used
4 to confirm or refute that belief.

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6 **INTERROGATORY NO. 28.:** **IDENTIFY** the date of each board meeting held by the
7 Swedish Club board of directors in each year, 2022, 2023, and 2024, and for each board
8 meeting:

- 9 a. **IDENTIFY** each meeting wherein the board went into executive session. For each
10 executive session the board held:
- 11 i. **IDENTIFY** whether the meeting was held online or in-person;
 - 12 ii. **IDENTIFY** each of the attendees in the meeting, provide their **CONTACT**
13 **INFORMATION**, and describe their role or capacity they were in while
14 attending the meeting;
 - 15 iii. **IDENTIFY** and describe each topic of discussion, board business, executive
16 session business undertaken;
 - 17 iv. **IDENTIFY** all of the **DOCUMENTS** received, gathered, or on hand or
18 considered during the session that were used inform meeting attendees or
19 related to the executive session and the topics or business discussed or acted
20 upon during that session;
 - 21 v. **IDENTIFY** and describe any discussion, motion, vote, or other action taken
22 by a director, directors, or any other person in attendance at the meeting;
 - 23 vi. **IDENTIFY EACH** holder of the above described **DOCUMENTS**, and of the
24 minutes, and the recordings for those executive sessions;

Note: If the executive session was recorded and/or transcribed, a reproduction of the recording and/or transcript will suffice.

ANSWER:

19 **INTERROGATORY NO. 29.:** **IDENTIFY** the date of each of the Swedish Club board of
20 directors' standing, finance committee meetings held in each of the years, 2022, 2023, and
21 2024, and for each finance committee meeting:

- 22 a. **IDENTIFY** whether the meeting was held online or in-person;
- 23 b. **IDENTIFY** each of the attendees in the meeting; and
 - 24 i. provide their **CONTACT INFORMATION**; and
 - ii. describe their role or the capacity they were in while attending the meeting;
- c. **IDENTIFY** and describe each topic of discussion, board business, finance committee
business undertaken;

- 1 d. **IDENTIFY** all of the **DOCUMENTS** received, gathered, or on hand or considered
2 during the session that were used inform meeting attendees or related to the finance
committee meeting session, and the topics or business discussed or acted upon during
3 that session;
4 e. **IDENTIFY** and describe any discussion, motion, vote, or other action taken by a
director, directors, or any other person in attendance at the finance committee
5 meeting;
6 f. **IDENTIFY EACH** holder of the above described **DOCUMENTS**, and of the
minutes taken or recordings made of those executive sessions;

Note: If the finance committee meeting was recorded and/or transcribed, a reproduction of the
recording and/or transcript will suffice.

ANSWER:

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10 **INTERROGATORY NO. 30.:** As to **EACH** claim of liability against **YOU** or **EACH**
defendant please **IDENTIFY** all facts and evidence that refute or pertain to the Plaintiff's
11 allegations including any statute, ordinance, safety order, administrative rule, regulation, code,
or other regulation the Plaintiff contends **YOU** or **EACH** Defendant(s) violated.

ANSWER:

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16 **INTERROGATORY NO. 31.:** Please state, in **YOUR** own words, what you know or
believe about the circumstances surrounding the retirement of the former Swedish Club
17 executive director, Kristine Leander, and regarding two payments of \$50,000 and \$20,000 that
are alleged to have been paid to her in or about the first quarter of 2023; include in **YOUR**
18 Answer the basis upon which you have formed that belief; and **IDENTIFY** any
DOCUMENTS you have created or relied upon to form that belief

ANSWER:

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22 **INTERROGATORY NO. 32.:** **IDENTIFY** all **DOCUMENTS** or tangible items not
23 previously and specifically identified in these answers to interrogatories, which are in **YOUR**
possession, custody or control, or in the possession, custody or control of **YOUR** attorneys,
24 representatives or investigators, or which relate to the allegations and claims in the Plaintiff's

1 *First Amended Complaint*, the Plaintiff's liability contentions, claimed damages, and/or any
2 other discoverable matter. (NOTE: THE PROPOUNDING PARTY WILL MOVE AT TRIAL
3 TO EXCLUDE AS EVIDENCE ANY DOCUMENT OR TANGIBLE THING WHICH IS
4 NOT IDENTIFIED IN ANSWERS TO THESE INTERROGATORIES.)

5 **ANSWER:**

6 **INTERROGATORY NO. 33.: IDENTIFY** each **PERSON YOU** intend to call to testify at
7 trial as a witness. For each such witness please provide **CONTACT INFORMATION** and a
8 summary of what the witness will testify about.

9 **ANSWER:**

10 **INTERROGATORY NO. 34.: IDENTIFY** your cell phone number(s) and cell service
11 provider(s) from June 3, 2020 to present.

12 **ANSWER:**

REQUESTS FOR PRODUCTION NO.s 1 TO 88

REQUEST FOR PRODUCTION NO. - 1) Produce all written **DOCUMENTS**, including but not limited to, text messages, letters, and emails, you have received from or exchanged with ANY defendant during the period of January 2020-Present .

RESPONSE:

REQUEST FOR PRODUCTION NO. - 2) Copies of all audio recordings, videos, and transcripts thereof, relating to the Swedish Club from January 2020-Present.

RESPONSE:

REQUEST FOR PRODUCTION NO. - 3) Copies of photos and videos relating to the Swedish Club from June 2019-Present, including but not limited to, photos/videos taken from the Swedish Club, with Swedish Club members, and relating to any of the allegations or claims in your Amended Complaint. This includes photos you took, and photos sent to you by others.

RESPONSE:

REQUEST FOR PRODUCTION NO. - 4) Produce all written **DOCUMENTS**, including but not limited to, text messages, letters, and emails, you have received from or exchanged with ANY of the following individuals during the period of January 2020-Present relating to the Swedish Club:

Shama Albright	Wendy Clark	Carol Graves
Sarah Alaimo	Judy Cooper	Toene Hayes
Nicole Armour	Stina Cowan	Kiki Hedren
Mike Arst	Judith Dern	Petra Hilleberg
Maria Barrientos	Keita Doe	Jeff Hubner
Monica Beach	Mary-Katherine "Kathy"	Paul Jefferson
Brandon Benson	Doe	Kimberly Jacobson
Richard Billingham	Brenda Doe	Kris Johansson
Max Boyd	Erin Doherty	Martin Johansson
Joel Cambern	Mary Emerson	Chris Jones
Arista Catering	Diana Erickson	Carina Jonsson
RC Charles	Anna Faino	Malin Jonsson-Borgstrom
Karen Choyce	Joanne Foster	Eva Larson
Edith Christensen	Danny Francois	Christina Lea

1	Kristine Leander	Nina Pedersen	James Skrinde
	Ann-Margret Lightle	Chelsea Pederson	Molly Olson Smith
2	Emily Lim	Braden Penhoet	Neil Snyder
	Vivi-Anne Lindback	Judith Peterick	Sarah Sodt
3	Eileen Little	Tom Perricone	Lorelei Stevens
	Sharon Lucas	Julie Pheasant-Albright	Jan Sullivan
4	Stacey Martens	Erik Pihl	Gary Sund
	Lars Matthiesen	Anis Rahman	Ross Swanes
5	Penhoet McCann	Lori Ann Reinhall	Nathan Torgelson
	Kevin McGanney	Vi Reno	Katie Vail
6	Langdon Miller	Erik Ronning	Heather VanNuys
	Ken Needles	Christine Ross	Matthew Vivian
7	Jared O'Connell	Kirsten Roth	Priya Vivian
	Mark Olsen	Brian Runberg	Jenny Whitmer
8	City of Seattle	Marta Schee	Charles Willi
	Ib Odderson	Monica. Schilling	Jean Wirch
9	John Panzar	Eckhard Schipull	Christo Yaranoff
	Camille Parker	Yara Silva	Valerie Yerkes
10	Kate Patrick	Chris Sisco	Todd Yerks

RESPONSE:

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13 **REQUEST FOR PRODUCTION NO. 5)** All written communications. including, but not limited to, emails, text messages, letters, video and audio recordings:

- 14 a. With past, present, or future board members;
15 b. With any former or present employees; and
16 c. With any former or present members of the Swedish Cultural Center/Swedish Club,

RESPONSE:

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18 **REQUEST FOR PRODUCTION NO. 6)** Produce all **DOCUMENTS** relating to all applicants or applications for Swedish Club Board of Director membership since January 1, 2017-PRESENT.

RESPONSE:

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21 **REQUEST FOR PRODUCTION NO. 7)** Produce all **DOCUMENTS** relating to all applicants or applications for Swedish Club Executive Director between August 2022 to March 2023.

1 **RESPONSE:**

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4 **RE: PLAINTIFF’S CAUSES OF ACTION CLAIMS –**
5 **REQUESTS FOR PRODUCTION NO.s 8 to 50**

6 **REQUEST FOR PRODUCTION NO. 8)** Produce all **DOCUMENTS** relating to the
7 Plaintiff’s assault, batter, and false imprisonment claims against Sharon Lucas.

8 **RESPONSE:**

9 **REQUEST FOR PRODUCTION NO. 9)** Produce all **DOCUMENTS** relating to the
10 Plaintiff’s false light claims against Sharon Lucas, Molly Olson Smith, Kristine Leander, Gary
11 Sund, and Sarah Alaimo.

12 **RESPONSE:**

13 **REQUEST FOR PRODUCTION NO. 10)** Produce all **DOCUMENTS** relating to the
14 Plaintiff’s defamation claims against Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine
15 Leander, Gary Sund, and Sarah Alaimo.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 11)** Produce all **DOCUMENTS** relating to the
18 Plaintiff’s tortious interference with a contract claims against Sharon Lucas, Molly Olson
19 Smith, Toene Hayes, Kristine Leander, Gary Sund, Elizabeth Norgren, and Sarah Alaimo.

20 **RESPONSE:**

21 **REQUEST FOR PRODUCTION NO. 12)** Produce all **DOCUMENTS** relating to the
22 Plaintiff’s tortious interference of employment claims against: Sharon Lucas, Molly Olson
23 Smith, Toene Hayes, Kristine Leander, Gary Sund, Elizabeth Norgren, and Sarah Alaimo.

24 **RESPONSE:**

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REQUEST FOR PRODUCTION NO. 13) Produce all **DOCUMENTS** relating to the Plaintiff's IIED claims against: Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, and Elizabeth Norgren.

RESPONSE:

REQUEST FOR PRODUCTION NO. 14) Produce all **DOCUMENTS** relating to the Plaintiff's NIED claims against: Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, and Elizabeth Norgren.

RESPONSE:

REQUEST FOR PRODUCTION NO. 15) Produce all **DOCUMENTS** relating to the Plaintiff's Negligent Supervision of Sharon Lucas claims against Molly Olson Smith, Gary Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION NO. 16) Produce all **DOCUMENTS** relating to the Plaintiff's Negligent Supervision of Sarah Alaimo claims against Molly Olson Smith, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION NO. 17) Produce all **DOCUMENTS** relating to the Plaintiff's Negligent Supervision of Elizabeth Norgren claims against Molly Olson Smith, Gary Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB

1 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish
2 Club Foundation, Langdon Miller.

3 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 18)** Produce all **DOCUMENTS** relating to the
6 Plaintiff's Negligent Supervision of Kristine Leander claims against Molly Olson Smith, Gary
7 Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
8 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish
9 Club Foundation, Langdon Miller.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 19)** Produce all **DOCUMENTS** relating to the
12 Plaintiff's Negligent Retention of Sharon Lucas claims against Molly Olson Smith, Gary Sund,
13 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
14 Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club
15 Foundation, Langdon Miller.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 20)** Produce all **DOCUMENTS** relating to the
18 Plaintiff's Negligent Retention of Sarah Alaimo claims against Molly Olson Smith, Gary Sund,
19 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
20 Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club
21 Foundation, Langdon Miller.

22 **RESPONSE:**

23 **REQUEST FOR PRODUCTION NO. 21)** Produce all **DOCUMENTS** relating to the
24 Plaintiff's Negligent Retention of Elizabeth Norgren claims against Molly Olson Smith, Gary
Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB

1 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish
Club Foundation, Langdon Miller.

2 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 22)** Produce all **DOCUMENTS** relating to the
6 Plaintiff's Negligent Retention of Kristine Leander claims against Molly Olson Smith, Gary
7 Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
Club Foundation, Langdon Miller.

8 **RESPONSE:**

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11 **REQUEST FOR PRODUCTION NO. 23)** Produce all **DOCUMENTS** relating to the
12 Plaintiff's Negligent Hiring of Sarah Alaimo claims against Molly Olson Smith, Gary Sund,
13 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
14 Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation,
15 Langdon Miller.

16 **RESPONSE:**

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18 **REQUEST FOR PRODUCTION NO. 24)** Produce all **DOCUMENTS** relating to the
19 Plaintiff's Negligent Hiring of Elizabeth Norgren claims against Molly Olson Smith, Sarah
20 Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
21 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish
22 Club Foundation, Langdon Miller.

23 **RESPONSE:**

24 **REQUEST FOR PRODUCTION NO. 25)** Produce all **DOCUMENTS** relating to the
Plaintiff's Wage Theft – SMC 14.20 claims against Molly Olson Smith, Sarah Alaimo, Gary
Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil

1 Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club
2 Foundation, Langdon Miller.

3 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 26)** Produce all **DOCUMENTS** relating to the
6 Plaintiff's WLAD- National Origin Based Discrimination claims against Molly Olson Smith,
7 Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil
8 Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon
9 Miller.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 27)** Produce all **DOCUMENTS** relating to the
12 Plaintiff's WLAD – Disability Based Discrimination claims against Molly Olson Smith, Sarah
13 Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
14 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish
15 Club Foundation, Langdon Miller.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 28)** Produce all **DOCUMENTS** relating to the
18 Plaintiff's WLAD – Age Discrimination claims against Molly Olson Smith, Sarah Alaimo, Gary
19 Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil
20 Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club
21 Foundation, Langdon Miller.

22 **RESPONSE:**

23 **REQUEST FOR PRODUCTION NO. 29)** Produce all **DOCUMENTS** relating to the
24 Plaintiff's WLAD – Gender Discrimination claims against Molly Olson Smith, Sarah Alaimo,
Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil

1 Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club
2 Foundation, Langdon Miller.

3 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 30)** Produce all **DOCUMENTS** relating to the
6 Plaintiff's WLAD – Retaliation claims against Molly Olson Smith, Sarah Alaimo, Gary Sund,
7 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
8 Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation,
9 Langdon Miller.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 31)** Produce all **DOCUMENTS** relating to the
12 Plaintiff's Retaliation SMC 14.20 claims against Molly Olson Smith, Sarah Alaimo, Gary Sund,
13 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
14 Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation,
15 Langdon Miller.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 32)** Produce all **DOCUMENTS** relating to the
18 Plaintiff's WLAD – Hostile Work Environment claims against Molly Olson Smith, Kristine
19 Leander, Elizabeth Norgren, Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory
20 Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna
21 Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

22 **RESPONSE:**

23 **REQUEST FOR PRODUCTION NO. 33)** Produce all **DOCUMENTS** relating to the
24 Plaintiff's Hostile Work Environment Title VII Civil Rights claims against Molly Olson Smith,
Kristine Leander, Elizabeth Norgren, Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright,

1 Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin
2 Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

3 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 34)** Produce all **DOCUMENTS** relating to the
6 Plaintiff's Hostile Work Environment 42 USC claims against Molly Olson Smith, Kristine
7 Leander, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
8 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club
9 Foundation, Langdon Miller.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 35)** Produce all **DOCUMENTS** relating to the
12 Plaintiff's Invasion of Privacy – Publicity Given to Private Acts claims against Kristine
13 Leander, Gary Sund, and Sarah Alaimo.

14 **RESPONSE:**

15 **REQUEST FOR PRODUCTION NO. 36)** Produce all **DOCUMENTS** relating to the
16 Plaintiff's RCW 49.60.030(3) Freedom From Discrimination claims against Molly Olson Smith,
17 Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
18 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club
19 Foundation, Langdon Miller.

20 **RESPONSE:**

21 **REQUEST FOR PRODUCTION NO. 37)** Produce all **DOCUMENTS** relating to the
22 Plaintiff's RCW 49.12.020 and WAC 296-126-092 claims against Molly Olson Smith, Sarah
23 Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
24 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club
Foundation, Langdon Miller.

1 **RESPONSE:**

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4 **REQUEST FOR PRODUCTION NO. 38)** Produce all **DOCUMENTS** relating to the
5 Plaintiff's RCW 49.46.090 and 49.46.130 claims against Molly Olson Smith, Gary Sund, Sarah
6 Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil
7 Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon
8 Miller.

9 **RESPONSE:**

10 **REQUEST FOR PRODUCTION NO. 39)** Produce all **DOCUMENTS** relating to the
11 Plaintiff's Consumer Protection Act and WLAD unfair/deceptive act claims against Molly
12 Olson Smith, Elizabeth Norgren, Gary Sund, Sarah Alaimo, Vinda Sund, Shama Albright,
13 Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin
14 Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION NO. 40)** Produce all **DOCUMENTS** relating to the
17 Plaintiff's WLAD Public Accommodation RCW 49.60.215 claims against Molly Olson Smith,
18 Gary Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB
19 Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club
20 Foundation, Langdon Miller.

21 **RESPONSE:**

22 **REQUEST FOR PRODUCTION NO. 41)** Produce all **DOCUMENTS** relating to the
23 Plaintiff's SMC 12 Public Accommodation claims against Molly Olson Smith, Gary Sund,
24 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation,
Langdon Miller.

1 **RESPONSE:**

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4 **REQUEST FOR PRODUCTION NO. 42)** Produce all **DOCUMENTS** relating to the
5 Plaintiff’s breach of contract – courtesy sign claims against Molly Olson Smith, Elizabeth
6 Norgren, Gary Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary
7 Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club,
8 Swedish Club Foundation, Langdon Miller.

9 **RESPONSE:**

10 **REQUEST FOR PRODUCTION NO. 43)** Produce all **DOCUMENTS** relating to the
11 Plaintiff’s breach of contract claims against Molly Olson Smith, Elizabeth Norgren, Gary Sund,
12 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
13 Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation,
14 Langdon Miller.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION NO. 44)** Produce all **DOCUMENTS** relating to the
17 Plaintiff’s aiding and abetting claim against Sarah Alaimo

18 **RESPONSE:**

19 **REQUEST FOR PRODUCTION NO. 45)** Produce all **DOCUMENTS** relating to the
20 Plaintiff’s vicarious liability – Sarah Alaimo claims against Molly Olson Smith, Gary Sund,
21 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
22 Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 46)** Produce all **DOCUMENTS** relating to the
2 Plaintiff's vicarious liability – Sharon Lucas claims against Molly Olson Smith, Gary Sund,
3 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
4 Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation,
5 Langdon Miller.

6 **RESPONSE:**

7 **REQUEST FOR PRODUCTION NO. 47)** Produce all **DOCUMENTS** relating to the
8 Plaintiff's vicarious liability – Kristine Leander claims against Molly Olson Smith, Gary Sund,
9 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
10 Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation,
11 Langdon Miller.

12 **RESPONSE:**

13 **REQUEST FOR PRODUCTION NO. 48)** Produce all **DOCUMENTS** relating to the
14 Plaintiff's vicarious liability – Elizabeth Norgren claims against Molly Olson Smith, Gary Sund,
15 Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,
16 Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation,
17 Langdon Miller.

18 **RESPONSE:**

19 **REQUEST FOR PRODUCTION NO. 49)** Produce all **DOCUMENTS** relating to the
20 Plaintiff's premises liability claims against the Swedish Club and Swedish Club Foundation.

21 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 50)** Produce all **DOCUMENTS** relating to the
2 Plaintiff's discrimination and retaliation – under Seattle Fair Employment Practices Ordinance,
3 Seattle Muni Code 14.04 claims against the Swedish Club and Swedish Club Foundation.

4 **RESPONSE:**

5
6 **REQUEST FOR PRODUCTION NO. 51)** Produce **YOUR** current curriculum vitae or
7 resume.

8 **RESPONSE:**

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10 **REQUEST FOR PRODUCTION NO. 52)** Produce all reports, fee schedules, agreements
11 with, and a current curriculum vitae or resume for each **PERSON YOU** expect to call as an
12 expert witness at trial.

13 **RESPONSE:**

14
15 **REQUEST FOR PRODUCTION NO. 53)** Produce all **DOCUMENTS** sent to or received
16 from any expert witness **YOU** expect to call as an expert witness at trial pertaining to this
17 lawsuit. This includes any fee agreements, emails, and text messages.

18 **RESPONSE:**

19 **REQUEST FOR PRODUCTION NO. 54)** If your answer to **INTERROGATORY NO. 2**
20 above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
21 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

22 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 55)** If your answer to **INTERROGATORY NO. 6**
2 above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
3 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

4 **RESPONSE:**

5 **REQUEST FOR PRODUCTION NO. 56)** If your answer to **INTERROGATORY NO. 7**
6 above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
7 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

8 **RESPONSE:**

9 **REQUEST FOR PRODUCTION NO. 57)** If your answer to **INTERROGATORY**
10 **NO. 10** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
11 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

12 **RESPONSE:**

13 **REQUEST FOR PRODUCTION NO. 58)** If your answer to **INTERROGATORY**
14 **NO. 11** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
15 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 59)** If your answer to **INTERROGATORY**
18 **NO. 12** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
19 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

20 **RESPONSE:**

21 **REQUEST FOR PRODUCTION NO. 60)** If your answer to **INTERROGATORY**
22 **NO. 15** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
23 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

24 **RESPONSE:**

REQUEST FOR PRODUCTION NO. 61) If your answer to **INTERROGATORY**

1 **NO. 16** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
2 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

3 **RESPONSE:**

4 **REQUEST FOR PRODUCTION NO. 62)** If your answer to **INTERROGATORY**
5 **NO. 17** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
6 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

7 **RESPONSE:**

8 **REQUEST FOR PRODUCTION NO. 63)** If your answer to **INTERROGATORY**
9 **NO. 18** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
10 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

11 **RESPONSE:**

12 **REQUEST FOR PRODUCTION NO. 64)** If your answer to **INTERROGATORY**
13 **NO. 19** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
14 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION NO. 65)** If your answer to **INTERROGATORY**
17 **NO. 22** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
18 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

19 **RESPONSE:**

20 **REQUEST FOR PRODUCTION NO. 66)** If your answer to **INTERROGATORY**
21 **NO. 23** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
22 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

23 **RESPONSE:**

24 **REQUEST FOR PRODUCTION NO. 67)** If your answer to **INTERROGATORY**

1 **NO. 27** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
2 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

3 **RESPONSE:**

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5 **REQUEST FOR PRODUCTION NO. 68)** If your answer to **INTERROGATORY**
6 **NO. 28** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
7 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

8 **RESPONSE:**

9 **REQUEST FOR PRODUCTION NO. 69)** If your answer to **INTERROGATORY**
10 **NO. 29** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
11 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

12 **RESPONSE:**

13 **REQUEST FOR PRODUCTION NO. 70)** If your answer to **INTERROGATORY**
14 **NO. 31** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
15 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 71)** If your answer to **INTERROGATORY**
18 **NO. 32** above **IDENTIFIED DOCUMENTS** or references **DOCUMENTS** please produce all
19 **DOCUMENTS** consistent with **Definition 1. "DOCUMENTS"**.

20 **RESPONSE:**

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22 **REQUEST FOR PRODUCTION NO. 72)** Please produce a copy of any diary or journal
23 entries that discusses the allegations or claims in this lawsuit.

24 **RESPONSE:**

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REQUEST FOR PRODUCTION NO. 73) Please produce a copy of any statements YOU made to anyone that discusses the allegations or claims in this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 74) Produce all **DOCUMENTS** and other tangible items identified in answers to interrogatories and/or which support your answers to interrogatories and/or your allegations in this case; and/or all other **DOCUMENTS** or tangible items which pertain to a discoverable matter in this case.

RESPONSE:

REQUEST FOR PRODUCTION NO. 75) Please produce all written communications, including text messages, letters, emails, with any current or past members of the Swedish Club, from June 3, 2020-Present.

RESPONSE:

REQUEST FOR PRODUCTION NO. 76) Please produce copies of any saved voicemails and any related transcriptions relating to the Plaintiff's claims in this lawsuit.

RESPONSE:

REQUEST FOR PRODUCTION NO. 77) Please produce copies of all calendars (including electronic calendars on Microsoft Outlook, Google, or any other electronic or web-based program and electronic calendars maintained on a tablet device or smart phone) that you maintained for personal use or business use, between June 3, 2019 to Present.

RESPONSE:

1 **REQUEST FOR PRODUCTION NO. 78)** Please produce a complete copy of your
2 Facebook data and provide all documentation from June 3, 2019 to Present. If you are
3 withholding any information for privacy reasons, please produce a privilege log and identify
4 with specificity what is being withheld. (Facebook – Settings – “Download a copy of your
5 Facebook data). Also, please produce a complete copy of your Instagram data and provide all
6 post-INCIDENT documentation ([https://www.cnet.com/how-to/how-to-download-all-your-
7 instagram-data/](https://www.cnet.com/how-to/how-to-download-all-your-instagram-data/)).

8 **RESPONSE:**

9 **REQUEST FOR PRODUCTION NO. 79)** Please produce a complete copy of your
10 Instagram data and provide all documentation from June 3, 2019 to Present. If you are
11 withholding any information for privacy reasons, please produce a privilege log and identify
12 with specificity what is being withheld. <https://help.instagram.com/181231772500920>.

13 **RESPONSE:**

14 **REQUEST FOR PRODUCTION NO. 80)** Please produce copies of all calendars
15 (including electronic calendars on Microsoft Outlook, Google, or any other electronic or web-
16 based program and electronic calendars maintained on a tablet device or smart phone) that
17 you maintained for personal use or business use, between June 3, 2019 to Present.

18 **RESPONSE:**

19 **REQUEST FOR PRODUCTION NO. 81)** Please produce copies of all text messages,
20 cell phone call detail, and cell phone photos from March 1, 2023.

21 **RESPONSE:**

22 **REQUEST FOR PRODUCTION NO. 82)** Please produce all of your Apple Photo
23 Memories between June 3, 2019 to Present.

24 **RESPONSE:**

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REQUEST FOR PRODUCTION NO. 83) Please produce all written communications you have received from others about the websites: saveourswedishclub.org and swedishclub411.com.

RESPONSE:

REQUEST FOR PRODUCTION NO. 84) Please produce your contract and all communications with any investigations or background check providers relating to this case.

RESPONSE:

REQUEST FOR PRODUCTION NO. 85) Please produce all documents you have submitted to or received from the EEOC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 86) Please produce all documents you have submitted to or received from the Washington State Human Rights Commission

RESPONSE:

REQUEST FOR PRODUCTION NO. 87) Please produce all documents you have submitted to or received from the Seattle Office of Civil Rights.

RESPONSE:

REQUEST FOR PRODUCTION NO. 88) Please produce copies of any personal research and reports regarding the Plaintiff or any Defendants in this lawsuit.

RESPONSE:

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DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that:

- a) I am the Defendant in this action and am authorized to make the foregoing answers.
- b) I have made a reasonable inquiry of all available sources of information such that Plaintiff may rely on these answers as the truthful and complete answers made on behalf of this answering Defendant.
- c) I have read the foregoing answers, know the contents thereof, and believe them to be true and correct.

Dated this _____ day of _____, 2024 at _____, Washington.

Name DEFENDANT

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CERTIFICATE OF SERVICE

I, Elizabeth A. Campbell, certify that on April 16, 2024 I caused to be served a true and correct copy of the foregoing INTERROGATORIES TO DEFENDANT LANGDON MILLER via the method indicated below and addressed to the following:

Rachel Tallon Reynolds, WSBA #38750
Chuqiao Wang, WSBA #57196
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- Legal Messenger
- U.S. Mail
- E-mail
- KCLGR 30 electronic service

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED April 16, 2024, at Seattle, Washington.



Elizabeth A. Campbell, MPA
Plaintiff Pro Se
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Seattle, WA 98199
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Fax: 206-283-6300
neighborhoodwarrior@gmail.com