

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

EXHIBIT A

STATE OF WASHINGTON
KING COUNTY SUPERIOR COURT

ELIZABETH A. CAMPBELL, an individual, Plaintiff, v. SHARON LUCAS, et al, Defendants.	NO. 23-2-25195-4 sea SUBPOENA DUCES TECUM
--	--

TO: **CHRISTO D. YARANOFF**
509 4th ST Suite 16
Bremerton WA 98337-1401

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or tangible things at the place, date, and time specified below:

- 1) All written communications with Kristine Leander, including but not limited to, emails, text messages, letters, pictures, video and audio recordings.
- 2) All written communications with Anis Rahman, including but not limited to, emails, text messages, letters, pictures, video and audio recordings.
- 3) All written communications with Elizabeth Norgren, including but not limited to, emails, text messages, letters, pictures, video and audio recordings.
- 4) All written communications with Joel Cambern, including but not limited to, emails, text messages, letters, pictures, video and audio recordings.
- 5) All written communications with Sarah Alaimo, including but not limited to, emails, text messages, letters, pictures, video and audio recordings.
- 6) All written communications with any other person or business entity relating to the Swedish Club/Swedish Cultural Center/Swedish Club LLC.

- 7) All written communications with past, present, or future board members, with any former or present employees, with any former or present members of the Swedish Cultural Center/Swedish Club, including, but not limited to, emails, text messages, letters, video and audio recordings.
- 8) All reports, memos, of every produced by you or others during your employment with the Swedish Club regarding the financial performance and operations of the Swedish Cultural Center's/Swedish Club's kitchen, catering, and bar service departments; including but not limited COGS, pricing programs, profitability or breakeven, inventory, shrink, event attendance, number of covers sold, number of entrees sold; and any due diligence studies undertaken to establish the marketability of profitability of any of the foodservice/bar/catering services provided.
- 9) A copy of all of your timecards (NOT YOUR PAY INFORMATION) and any time claims for earned or unearned vacation, leave, or other time off.

THIS REQUEST INCLUDES ANY AND ALL DATA IN ITS ELECTRONIC OR HARD COPY FORM AND IS LIMITED TO JULY 15, 2019 TO PRESENT.

PLACE	DATE AND TIME
Ballard Library – Reserved Meeting Room 5614 22 nd Ave NW Seattle, WA 98107	May 3, 2024 2:00 PM

IMPORTANT: The following provisions of Wash. St. Civ. R. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your duties in responding to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF SUPERIOR COURT FOR COUNTY OF KING

Signature of Clerk or Deputy Clerk

Person Requesting Subpoena Duces Tecum:

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

1 **Washington State Civil Rule 45, Sections (c), and (d):**

2 **(c) Protection of Persons Subject to Subpoenas.**

3 (1) A party or an attorney responsible for the issuance and service of a subpoena shall take
4 reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The
5 court shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate
6 sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

7 (2)(A) A person commanded to produce and permit inspection and copying of designated books,
8 papers, documents or tangible things, or inspection of premises need not appear in person at the place of
9 production or inspection unless commanded to appear for deposition, hearing or trial.

10 (B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit
11 inspection and copying may, within 14 days after service of subpoena or before the time specified for
12 compliance if such time is less than 14 days after service, serve upon the party or attorney designated in
13 the subpoena written objection to inspection or copying of any or all of the designated materials or of the
14 premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy
15 the materials or inspect the premises except pursuant to an order of the court by which the subpoena was
16 issued. If objection has been made, the party serving the subpoena may, upon notice to the person
17 commanded to produce and all other parties, move at any time for an order to compel the production.
18 Such an order to compel production shall protect any person who is not a party or an officer of a party
19 from significant expense resulting from the inspection and copying commanded.

20 (3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the
21 subpoena if it:

22 (i) fails to allow reasonable time for compliance;

23 (ii) fails to comply with RCW 5.56.010 or subsection (e)(2) of this rule;

24 (iii) requires disclosure of privileged or other protected matter and no exception or waiver
25 applies; or

26 (iv) subjects a person to undue burden, provided that the court may condition denial of the motion
upon a requirement that the subpoenaing party advance the reasonable cost of producing the books,
papers, documents, or tangible things.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or
commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific
events or occurrences in dispute and resulting from the expert's study made not at the request of any party,
the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena
or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or
material that cannot be otherwise met without undue hardship and assures that the person to whom the
subpoena is addressed will be reasonably compensated, the court may order appearance or production
only upon specified conditions.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept
in the usual course of business or shall organize and label them to correspond with the categories in the
demand.

(2)(A) When information subject to a subpoena is withheld on a claim that it is privileged or

1 subject to protection as trial preparation materials, the claim shall be made expressly and shall be
2 supported by a description of the nature of the documents, communications, or things not produced that
is sufficient to enable the demanding party to contest the claim.

3 (B) If information produced in response to a subpoena is subject to a claim of privilege or of
4 protection as trial-preparation material, the person making the claim may notify any party that received
the information of the claim and the basis for it. After being notified, a party must promptly return,
5 sequester, or destroy the specified information and any copies it has; must not use or disclose the
information until the claim is resolved; must take reasonable steps to retrieve the information if the party
6 disclosed it before being notified; and may promptly present the information in camera to the court for a
determination of the claim. The person responding to the subpoena must preserve the information until
the claim is resolved.