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8 **STATE OF WASHINGTON**  
9 **KING COUNTY SUPERIOR COURT**

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ELIZABETH A. CAMPBELL, an individual,  Plaintiff,  v.  SHARON LUCAS, et al  Defendants.	NO. 23-2-25195-4 sea  SUBPOENA DUCES TECUM
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16 **TO: JOEL CAMBERN**  
17 **2615 163<sup>RD</sup> PI SE**  
18 **Mill Creek, WA 98012**

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

- 21
- 22 1. All written communications with or regarding Elizabeth Norgren, including, but  
23 not limited to, emails, text messages, letters, pictures, video and audio  
24 recordings.
  - 25 2. All written communications with others relating to Elizabeth Campbell,  
26 including, but not limited to, emails, text messages, letters, pictures, and video  
and audio recordings. For emails and texts and other documents, please use  
search terms "Elizabeth Campbell," "Campbell," and "Swedish Club."
  3. All recordings involving any Swedish Club/Swedish Cultural Center member  
or members (past or present) in your possession.
  4. All written communications with any other person or business entity relating to  
the Swedish Club/Swedish Cultural Center.

- 1 5. All written communications with past, present, or future board members, with  
2 any former or present employees, with any former or present members of the  
3 Swedish Cultural Center/Swedish Club, including, but not limited to, emails,  
text messages, letters, video and audio recordings.

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

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

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9 **IMPORTANT:** The following provisions of Wash. St. Civ. R. 45 are attached – Rule 45(c),  
10 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.

11 Date: \_\_\_\_\_

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13 CLERK OF SUPERIOR COURT FOR COUNTY OF KING

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15 \_\_\_\_\_  
16 Signature of Clerk or Deputy Clerk

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18  
19 Person Requesting Subpoena Duces Tecum:

20 Elizabeth A. Campbell, MPA  
21 3826 24<sup>th</sup> Ave W.  
22 Seattle, WA 98199  
23 206-769-8459  
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.