

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

**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, MOLLY OLSON SMITH, an individual, TOENE HAYES, an individual, KRISTINE LEANDER, an individual, GARY SUND and VINDA SUND, individually, and the marital community thereof, ELIZABETH M. NORGRN, LARS MATTHIESEN, and YARA H. O. SILVA, individually, and the marital community thereof, VI RENO, an individual, SHAMA ALBRIGHT, an individual, GREGORY ALBRIGHT, an individual, MARY EMERSON, an individual, IB R. ODDERSON, and INGRID SALMON, individually, and the marital community thereof, LANGDON L. MILLER and MARTA K. SCHEE, individually, and the marital community thereof, NEIL SNYDER and LISA K. LINDSTROM, individually, and the marital community thereof, KRIS E. JOHANSSON, an individual, MARTIN K. JOHANSSON, an individual, ANNA FAINO and NICOLAUS FAINO, individually, and the marital community thereof, SARAH D. ALAIMO, an individual, JOHN A. ALAIMO, an individual, and the marital community thereof, SWEDISH CULTURAL CENTER d/b/a the SWEDISH CLUB, a Washington non-profit corporation,

No. 23-2-25195-4 SEA

DEFENDANT SWEDISH CULTURAL CENTER'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION PROPOUNDED TO PLAINTIFF

1 SWEDISH CLUB FOUNDATION, a
2 Washington non-profit corporation, JANE
3 ISAKSON LEA FOUNDATION, a
4 Washington non-profit corporation, GREAT
5 AMERICAN INSURANCE AGENCY INC., a
6 foreign profit corporation, and LANE
7 POWELL PC, a foreign profit corporation,
8 PRIYA B. VIVIAN, an individual,
9 MATTHEW J. VIVIAN, an individual, and
10 the marital community thereof, and DOES 1-
11 20, inclusive,

12 Defendants.

13 TO: ELIZABETH A. CAMPBELL, Plaintiff

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

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

23 DEFINITIONS

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

1 knowledge or to which you have or have had access, or of which any of your agents, attorneys,
2 accountants or consultants have had knowledge.

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

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

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

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

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

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

23 8. **“HEALTH CARE PROVIDER”** means a person or facility who is licensed, certified,
24 registered, or otherwise authorized by the law to provide health care in the ordinary course of
business or practice of a profession. This includes, but is not limited to, care for physical,
mental, emotional, or behavioral issues, counseling or any substance abuse.

9. **“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).

10. **“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.

1 Dated this 1st day of April, 2024

2 MIX SANDERS THOMPSON, PLLC

3 s/Michael K. Rhodes
4 Michael K. Rhodes, WSBA No. 41911
5 Kenna A. Duckworth, WSBA No. 54004
6 Attorneys for Defendant Swedish Cultural Center
7 (“Swedish Club”)

8 **INTERROGATORIES**

9 **INTERROGATORY NO. 1.:** Please provide **CONTACT INFORMATION** for you and
10 anyone living with you for the last ten years.

11 **ANSWER:**

12 **INTERROGATORY NO. 2.:** Please state your birthdate and educational history beginning
13 with high school, including the name of each institution attended, any degrees and honors
14 received, and dates of attendance.

15 **ANSWER:**

16 **INTERROGATORY NO. 3.:** Please set forth your **EMPLOYMENT HISTORY** beginning
17 ten (10) years before the date of the **INCIDENT** through present.

18 **ANSWER:**

19 **INTERROGATORY NO. 4.:** With respect to the allegations contained within paragraphs
20 5.1 through 5.976 of Plaintiff’s Amended Complaint, please identify with specificity the
21 following:

- 22 a) All facts which support such claims;
- 23 b) **CONTACT INFORMATION** for all **PERSONS** with knowledge of such claim; and
- 24 c) All **DOCUMENTS** relied upon to support such claim.

ANSWER:

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

INTERROGATORY NO. 5.: Aside from Plaintiff’s **HEALTH CARE PROVIDERS** 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 your claims or damages asserted in your Amended Complaint. For each such **PERSON**, please provide a brief description of the **PERSON’S** knowledge and their relationship to the case.

ANSWER:

INTERROGATORY NO. 6.: Please provide the **CONTACT INFORMATION** for any **PERSON** who made any written and/or recorded statements relating to your claims in your Amended Complaint and, for each statement, please **IDENTIFY** the form of the statement (e.g., written, recorded, transcribed, etc.) and **CONTACT INFORMATION** for the present custodian.

ANSWER:

INTERROGATORY NO. 7.: **IDENTIFY** all photographs, motion pictures, videos, slides, drawings, diagrams, repair estimates, maps, or other graphic or electronic representations relating to the claims in your Amended Complaint or that will be used to support any of your damage claims (including, but not limited to, photographs of plaintiff before or after the occurrences). For each item, please provide **CONTACT INFORMATION** of the creator of the item, the date it was created, and what it depicts.

ANSWER:

1 **INTERROGATORY NO. 8.:** For any physical, mental or emotional injuries, disability, or
2 disfigurement **YOU** are claiming relating to the claims in your Amended Complaint, please:

- 3 a) Describe **YOUR** understanding of each injury, disability or disfigurement and
4 **IDENTIFY** each area of your body affected;
5 b) **IDENTIFY** the approximate date it returned to the pre-**OCCURRENCE** level;
6 and
7 c) For all continuing complaints, state whether the complaint is subsiding,
8 remaining the same, or becoming worse and include the frequency and duration
9 of the complaint.

10 **ANSWER:**

11 **INTERROGATORY NO. 9.:** Please provide **CONTACT INFORMATION** for each
12 **HEALTH CARE PROVIDER** or other **PERSON** you received treatment or services from
13 after June 3, 2020. For each, please **IDENTIFY** the type of treatment provided and duration.

14 **ANSWER:**

15
16
17 **INTERROGATORY NO. 10.:** Please **IDENTIFY** all prescription and nonprescription
18 medications and pharmaceutical substances you have used over the last seven (7) years. For
19 each such medication or substance listed, please provide **CONTACT INFORMATION** for the
20 **HEALTH CARE PROVIDER** prescribing the medication and facility providing medication.

21 **ANSWER:**

22
23 **INTERROGATORY NO. 11.:** Please provide **CONTACT INFORMATION** for any
24 **HEALTH CARE PROVIDER** who advised **YOU** that you may require future care or
additional treatment for any injuries or damages relating to the claims in your Amended

1 Complaint specifying the additional treatment(s) recommended and anticipated/estimated cost
and duration.

2 **ANSWER:**

3
4
5
6 **INTERROGATORY NO. 12.:** Please provide an itemized list of all economic damages **YOU**
7 are seeking in this lawsuit including **CONTACT INFORMATION** for each item and describe
8 in detail (including amount and method of calculation), without limitation, each type of
9 economic damage claimed. Specifically, this includes itemization of “Clerical or Secretarial
Tasks Costs,” “Paralegal Costs,” and “General Costs,” as identified in page 321 of your
Amended Complaint.

10 **ANSWER:**

11
12
13
14
15 **INTERROGATORY NO. 13.:** Do you attribute any loss of income (past or future) or earning
capacity to the claims in your Amended Complaint? If so, please provide the following:

- 16 a) The total income you claim to have lost to date and/or will lose in the future as a result of
the **INCIDENT(s)** and how these amounts are calculated;
- 17 b) **CONTACT INFORMATION** for every **PERSON** who would have paid you income but
for the **INCIDENT(s)** alleged in the complaint;
- 18 c) The date you last worked for compensation before the **INCIDENT(s)** and date you
returned to work following the **INCIDENT**;
- 19 d) Your annual income for each year beginning ten (10) years prior to the **INCIDENT(s)** until
the present including the sources of each; and
- 20 e) **CONTACT INFORMATION** for any **PERSON** (including CPAs) who assisted in filing
your Federal Income Tax Returns for the last ten (10) years.

21 **ANSWER:**

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

INTERROGATORY NO. 14.: Please provide **CONTACT INFORMATION** for each **HEALTH CARE PROVIDER**, including, but not limited to, any chiropractor, mental health professional, orthopedist, neurologist, massage therapist, pain management doctor, or physical therapist you treated with during the seven (7) years before June 3, 2020. For each, please **IDENTIFY** the reason for and date(s) of treatment(s).

ANSWER:

INTERROGATORY NO. 15.: As to **EACH** claim of liability against **EACH** defendant please **IDENTIFY** all facts and evidence that support or pertain to your allegations including any statute, ordinance, safety order, administrative rule, regulation, code, or other regulation **YOU** contend Defendant(s) violated.

ANSWER:

1 **INTERROGATORY NO. 16.: IDENTIFY** all **DOCUMENTS** or tangible items not
2 previously and specifically identified in these answers to interrogatories, which are in **YOUR**
3 possession, custody or control, or the possession, custody or control of **YOUR** attorneys,
4 representatives or investigators, or which relate to the allegations and claims in your Amended
5 Complaint, your liability contentions, claimed damages, and/or any other discoverable matter.
(NOTE: THE PROPOUNDING PARTY WILL MOVE AT TRIAL TO EXCLUDE AS
6 EVIDENCE ANY DOCUMENT OR TANGIBLE THING WHICH IS NOT IDENTIFIED IN
7 ANSWERS TO THESE INTERROGATORIES.)

8 **ANSWER:**

9
10
11 **INTERROGATORY NO. 17.: IDENTIFY** each **PERSON YOU** intend to call to testify at
12 trial as a witness. For each such witness please provide **CONTACT INFORMATION** and a
summary of what the witness will testify about.

13 **ANSWER:**

14
15
16
17
18
19 **INTERROGATORY NO. 18.: IDENTIFY** each **PERSON YOU** intend to call as an expert
witness at the trial of this matter by providing the following:

- 20 a) The **CONTACT INFORMATION** and qualifications of each expert;
- 21 b) The substance of the facts and opinions to be testified to by each expert; and
- 22 c) A summary of the grounds for each opinion rendered by each expert.

23 **ANSWER:**

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

INTERROGATORY NO. 19.: IDENTIFY all checking and credit card account numbers and banks/credit unions/creditors that have documentation of any claims you are making in this lawsuit.

ANSWER:

INTERROGATORY NO. 20.: IDENTIFY your cell phone number and cell service provider from June 3, 2020 to present.

ANSWER:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION 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 2: Produce copy of Google Drive folder “SC Notices to Board.”

RESPONSE:

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

REQUEST FOR PRODUCTION 3: Produce copy of Google Drive folder “Swedish Club Business.”

RESPONSE:

REQUEST FOR PRODUCTION 4: Produce copy of Google Drive folder “Swedish Club Business, SC litigation.”

RESPONSE:

REQUEST FOR PRODUCTION 5: Copies of all audio recordings, videos, and transcripts thereof, relating to the Swedish Club from January 2020-Present.

RESPONSE:

REQUEST FOR PRODUCTION 6: 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 7: 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: Anis Rahman, Heather Van Nuys, Sullivan, Paul Jefferson, James Skrinde, Julie Pheasant-Albright, Malin Jonsson-Borgstrom, Vivi-Anne Lindback, Eckhard Shipull, Joel Cambern, Christo Yaranoff, Carina Jonsson, Christina Lea, Ann Margret, RC Charles, Wendy Clark, Emily Lim, Jeff Hubner, Jared O’Connell, Ken Needles, Danny Francois, Keita Doe, Jenny Whitmer, Christin Ross, “Arista Catering,” Ann Margaret Lightle, Judith Dern, Tom Perricone, Brian Runberg, Maria Barrientos, Edith Christensen, Chris Sisco, Mike Arst, Judy Cooper, Karen Choyce, Carol Graves, Chris Jones, Eileen Little, Penhoet McCann, Monica Schilling, Valerie Yerkes, Todd Yerks. Chelsea Pederson, City of Seattle, Katie Vail, Monica Beach, Nathan Torgelson, Sarah Sodt, Erin Doherty, Kiki Hendren, and Lorelei Stevens.

RESPONSE:

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

REQUEST FOR PRODUCTION 8: Produce all **DOCUMENTS** uploaded to INDEED.COM from January 1, 2017-PRESENT.

RESPONSE:

REQUEST FOR PRODUCTION 9: Produce all **DOCUMENTS** relating to all job applications with the Swedish Club or other individuals or entities since January 1, 2017-PRESENT.

RESPONSE:

REQUEST FOR PRODUCTION 10: Produce all **DOCUMENTS** relating to your assault, batter, and false imprisonment claims against Sharon Lucas.

RESPONSE:

REQUEST FOR PRODUCTION 11: Produce all **DOCUMENTS** relating to your false light claims against Sharon Lucas, Molly Olson Smith, Kristine Leander, Gary Sund, and Sarah Alaimo.

RESPONSE:

REQUEST FOR PRODUCTION 12: Produce all **DOCUMENTS** relating to your defamation claims against Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, and Sarah Alaimo.

RESPONSE:

REQUEST FOR PRODUCTION 13: Produce all **DOCUMENTS** relating to your tortious interference with a contract claims against Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, Elizabeth Norgren, and Sarah Alaimo.

RESPONSE:

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

REQUEST FOR PRODUCTION 14: Produce all **DOCUMENTS** relating to your tortious interference of employment claims against: Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, Elizabeth Norgren, and Sarah Alaimo.

RESPONSE:

REQUEST FOR PRODUCTION 15: Produce all **DOCUMENTS** relating to your IIED claims against: Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, and Elizabeth Norgren.

RESPONSE:

REQUEST FOR PRODUCTION 16: Produce all **DOCUMENTS** relating to your NIED claims against: Sharon Lucas, Molly Olson Smith, Toene Hayes, Kristine Leander, Gary Sund, and Elizabeth Norgren.

RESPONSE:

REQUEST FOR PRODUCTION 17: Produce all **DOCUMENTS** relating to your 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 18: Produce all **DOCUMENTS** relating to your 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:

1 **REQUEST FOR PRODUCTION 19:** Produce all **DOCUMENTS** relating to your Negligent
Supervision of Elizabeth Norgren claims against Molly Olson Smith, Gary Sund, Sarah Alaimo,
2 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation,
3 Langdon Miller.

4 **RESPONSE:**

5
6 **REQUEST FOR PRODUCTION 20:** Produce all **DOCUMENTS** relating to your Negligent
Supervision of Kristine Leander claims against Molly Olson Smith, Gary Sund, Sarah Alaimo,
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,
Langdon Miller.

9 **RESPONSE:**

10
11
12 **REQUEST FOR PRODUCTION 21:** Produce all **DOCUMENTS** relating to your Negligent
Retention of Sharon Lucas claims against Molly Olson Smith, Gary Sund, Sarah Alaimo, Vinda
13 Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris
Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon
14 Miller.

15 **RESPONSE:**

16
17 **REQUEST FOR PRODUCTION 22:** Produce all **DOCUMENTS** relating to your Negligent
Retention of Sarah Alaimo claims against Molly Olson Smith, Gary Sund, Sarah Alaimo, Vinda
18 Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris
Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon
19 Miller.

20 **RESPONSE:**

21
22 **REQUEST FOR PRODUCTION 23:** Produce all **DOCUMENTS** relating to your Negligent
Retention of Elizabeth Norgren claims against Molly Olson Smith, Gary Sund, Sarah Alaimo,
23 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
24

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

2 **RESPONSE:**

3
4
5 **REQUEST FOR PRODUCTION 24:** Produce all **DOCUMENTS** relating to your Negligent
Retention of Kristine Leander claims against Molly Olson Smith, Gary Sund, Sarah Alaimo,
6 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation,
7 Langdon Miller.

8 **RESPONSE:**

9
10 **REQUEST FOR PRODUCTION 25:** Produce all **DOCUMENTS** relating to your Negligent
Hiring of Sarah Alaimo claims against Molly Olson Smith, Gary Sund, Vinda Sund, Shama
11 Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin
Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

12 **RESPONSE:**

13
14
15 **REQUEST FOR PRODUCTION 26:** Produce all **DOCUMENTS** relating to your Negligent
Hiring of Elizabeth Norgren claims against Molly Olson Smith, Sarah Alaimo, Gary Sund,
16 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
Kris Johansson, Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation,
17 Langdon Miller.

18 **RESPONSE:**

19
20
21 **REQUEST FOR PRODUCTION 27:** Produce all **DOCUMENTS** relating to your Wage
Theft – SMC 14.20 claims against Molly Olson Smith, Sarah Alaimo, Gary Sund, Vinda Sund,
22 Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson,
Martin Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

23 **RESPONSE:**

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

REQUEST FOR PRODUCTION 28: Produce all **DOCUMENTS** relating to your WLAD-National Origin Based Discrimination claims against Molly Olson Smith, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 29: Produce all **DOCUMENTS** relating to your WLAD – Disability Based Discrimination claims against Molly Olson Smith, Sarah Alaimo, 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 30: Produce all **DOCUMENTS** relating to your WLAD – Age Discrimination claims against Molly Olson Smith, Sarah Alaimo, 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 31: Produce all **DOCUMENTS** relating to your WLAD – Gender Discrimination claims against Molly Olson Smith, Sarah Alaimo, 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 32: Produce all **DOCUMENTS** relating to your WLAD – Retaliation claims against Molly Olson Smith, Sarah Alaimo, Gary Sund, Vinda Sund, Shama

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

3 **RESPONSE:**

4
5 **REQUEST FOR PRODUCTION 33:** Produce all **DOCUMENTS** relating to your Retaliation
6 SMC 14.20 claims against Molly Olson Smith, Sarah Alaimo, Gary Sund, Vinda Sund, Shama
7 Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin
8 Johansson, Anna Faino, Swedish Club, Swedish Club Foundation, Langdon Miller.

9 **RESPONSE:**

10 **REQUEST FOR PRODUCTION 34:** Produce all **DOCUMENTS** relating to your WLAD –
11 Hostile Work Environment claims against Molly Olson Smith, Kristine Leander, Elizabeth
12 Norgren, Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary
13 Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino, Swedish
14 Club, Swedish Club Foundation, Langdon Miller.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION 35:** Produce all **DOCUMENTS** relating to your Hostile
17 Work Environment Title VII Civil Rights claims against Molly Olson Smith, Kristine Leander,
18 Elizabeth Norgren, Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright,
19 Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Anna Faino,
20 Swedish Club, Swedish Club Foundation, Langdon Miller.

21 **RESPONSE:**

22 **REQUEST FOR PRODUCTION 36:** Produce all **DOCUMENTS** relating to your Hostile
23 Work Environment 42 USC claims against Molly Olson Smith, Kristine Leander, Gary Sund,
24 Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder,
Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

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

REQUEST FOR PRODUCTION 37: Produce all **DOCUMENTS** relating to your Invasion of Privacy – Publicity Given to Private Acts claims against Kristine Leander, Gary Sund, and Sarah Alaimo.

RESPONSE:

REQUEST FOR PRODUCTION 38: Produce all **DOCUMENTS** relating to your RCW 49.60.030(3) Freedom From Discrimination claims against Molly Olson Smith, Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 39: Produce all **DOCUMENTS** relating to your RCW 49.12.020 and WAC 296-126-092 claims against Molly Olson Smith, Sarah Alaimo, Gary Sund, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 40: Produce all **DOCUMENTS** relating to your RCW 49.46.090 and 49.46.130 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, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 41: Produce all **DOCUMENTS** relating to your CPA and WLAD unfair/deceptive act claims against Molly Olson Smith, Elizabeth Norgren, Gary Sund, Sarah Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson,

DEFENDANTS' INTERROGATORIES TO PLAINTIFF – 18

Mix Sanders Thompson, PLLC
1601 Fifth Ave, Suite 1800
Seattle, WA 98101
Tel: 206-678-1000
Fax: 888-521-5980

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

2 **RESPONSE:**

3
4
5 **REQUEST FOR PRODUCTION 42:** Produce all **DOCUMENTS** relating to your WLAD
6 Public Accommodation RCW 49.60.215 claims against Molly Olson Smith, Gary Sund, Sarah
7 Alaimo, Vinda Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil
Miller.

8 **RESPONSE:**

9
10 **REQUEST FOR PRODUCTION 43:** Produce all **DOCUMENTS** relating to your SMC 12
11 Public Accommodation claims against Molly Olson Smith, Gary Sund, Sarah Alaimo, Vinda
12 Sund, Shama Albright, Gregory Albright, Mary Emerson, IB Odderson, Neil Snyder, Kris
Johansson, Martin Johansson, Swedish Club, Swedish Club Foundation, Langdon Miller.

13 **RESPONSE:**

14
15 **REQUEST FOR PRODUCTION 44:** Produce all **DOCUMENTS** relating to your breach of
16 contract – courtesy sign claims against Molly Olson Smith, Elizabeth Norgren, Gary Sund,
17 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.

18 **RESPONSE:**

19
20
21 **REQUEST FOR PRODUCTION 45:** Produce all **DOCUMENTS** relating to your breach of
22 contract claims against Molly Olson Smith, Elizabeth Norgren, Gary Sund, 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.

23 **RESPONSE:**

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

REQUEST FOR PRODUCTION 46: Produce all **DOCUMENTS** relating to your aiding and abetting claim against Sarah Alaimo

RESPONSE:

REQUEST FOR PRODUCTION 47: Produce all **DOCUMENTS** relating to your vicarious liability – 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, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 48: Produce all **DOCUMENTS** relating to your vicarious liability – 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, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 49: Produce all **DOCUMENTS** relating to your vicarious liability – Kristine Leander 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, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

REQUEST FOR PRODUCTION 50: Produce all **DOCUMENTS** relating to your vicarious liability – Elizabeth Norgren 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, Swedish Club, Swedish Club Foundation, Langdon Miller.

RESPONSE:

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

REQUEST FOR PRODUCTION 51: Produce all **DOCUMENTS** relating to your premises liability claims against the Swedish Club and Swedish Club Foundation.

RESPONSE:

REQUEST FOR PRODUCTION 52: Produce all **DOCUMENTS** relating to your discrimination and retaliation – under Seattle Fair Employment Practices Ordinance, Seattle Muni Code 14.04 claims against the Swedish Club and Swedish Club Foundation.

RESPONSE:

REQUEST FOR PRODUCTION 53: Produce all reports, fee schedules, agreements with, and a current curriculum vitae or resume for each **PERSON YOU** expect to call as an expert witness at trial.

RESPONSE:

REQUEST FOR PRODUCTION 54: Produce all **DOCUMENTS** sent to or received from any expert witness **YOU** expect to call as an expert witness at trial pertaining to this lawsuit. This includes any fee agreements, emails, and text messages.

RESPONSE:

REQUEST FOR PRODUCTION 55: Produce all medical, billing and imaging (CT scans, X-rays, MRIs, EKGs, EEGs, etc.) records for any **HEALTH CARE PROVIDER** identified in response to the foregoing Interrogatories.

RESPONSE:

1 **REQUEST FOR PRODUCTION 56:** Produce all documents in your possession relating to
your claimed disability.

2 **RESPONSE:**

3
4
5 **REQUEST FOR PRODUCTION 57:** Produce your Ancestry.Com research and genealogical
history, including a copy of your public family tree that you allegedly shared with Kristine
6 Leander on July 23, 2020.

7 **RESPONSE:**

8
9 **REQUEST FOR PRODUCTION 58:** Produce all bills, invoices, receipts, checks, bank/credit
card statements, and/or other **DOCUMENTS** reflecting amounts that **YOU** contend are
10 recoverable by **YOU** in this matter.

11 **RESPONSE:**

12
13 **REQUEST FOR PRODUCTION 59:** Produce copies of any **DOCUMENTS** on which **YOU**
intend to rely to support any claims of past or future loss of wages or income, impairment of
14 earning capacity, or any “non-medical” economic damages.

15 **RESPONSE:**

16
17 **REQUEST FOR PRODUCTION 60:** Produce copies of any **DOCUMENTS** that show your
attempt to mitigate (avoid or reduce) your damages.

18 **RESPONSE:**

19
20
21 **REQUEST FOR PRODUCTION 61:** Produce copies of all documents showing openings in
comparable job positions that you applied for from 2021-Present.

22 **RESPONSE:**

1 **REQUEST FOR PRODUCTION 62:** Produce copies of all documents relating to jobs you
applied for from 2021-Present.

2 **RESPONSE:**

3
4 **REQUEST FOR PRODUCTION 63:** Please produce a copy of any diary or journal entries
5 that discusses the allegations or claims in this lawsuit.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION 64:** Please produce any Declarations of Service for the
9 Summons and Complaint on any Defendant.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION 65:** Produce all **DOCUMENTS** and other tangible items
12 identified in answers to interrogatories and/or which support your answers to interrogatories
13 and/or your allegations in this case; and/or all other **DOCUMENTS** or tangible items which
pertain to a discoverable matter in this case.

14 **RESPONSE:**

15
16 **REQUEST FOR PRODUCTION 66:** Please produce an itemized list of all medical expenses
17 **YOU** are seeking in this lawsuit from June 1, 2020 to present. For each such expense, include
the **CONTACT INFORMATION** for the **PERSON** who paid the expense and **IDENTIFY** the
18 amount they are seeking for reimbursement.

19 **RESPONSE:**

20
21 **REQUEST FOR PRODUCTION 67:** Please produce an itemized list of all expenses **YOU** are
22 seeking in this lawsuit from June 1, 2020 to present. For each such expense, include the
CONTACT INFORMATION for the **PERSON** who paid the expense and **IDENTIFY** the
amount they are seeking for reimbursement.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION 68:** Please produce an itemized list of all “Clerical or
2 Secretarial Tasks Costs” identified in page 321 of your Complaint.

3 **RESPONSE:**

4 **REQUEST FOR PRODUCTION 69:** Please produce an itemized list of all “Paralegal Costs”
5 identified in page 321 of your Complaint.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION 70:** Please produce an itemized list of all “General Costs”
9 identified in page 321 of your Complaint.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION 71:** Please produce the native document for your chart
12 “Register Elizabeth Campbell Wage and Hour Claims.” Also please send any documents
13 showing that you provided that charge to any Defendants.

14 **RESPONSE:**

15 **REQUEST FOR PRODUCTION 72:** Please produce all written communications, including
16 text messages, letters, emails, with any current or past members of the Swedish Club, from June
17 3, 2020-Present.

18 **RESPONSE:**

19 **REQUEST FOR PRODUCTION 73:** Please produce copies of any saved voicemails and any
20 related transcriptions relating to your claims in this lawsuit.

21 **RESPONSE:**

22
23 **REQUEST FOR PRODUCTION 74:** Please produce copies of all calendars (including
24 electronic calendars on Microsoft Outlook, Google, or any other electronic or web-based

1 program and electronic calendars maintained on a tablet device or smart phone) that you
2 maintained for personal use or business use, between June 3, 2019 to Present.

3 **RESPONSE:**

4 **REQUEST FOR PRODUCTION 75:** Please produce copies of any ADA accommodation
5 request and written denial.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION NO. 76:** Please produce a complete copy of your Apple
9 Health Date relating to physical activity from June 3, 2019 to
10 Present. (<http://www.idownloadblog.com/2015/06/10/how-to-export-import-health-data/>).

11 **RESPONSE:**

12
13 **REQUEST FOR PRODUCTION NO. 77:** Please produce a complete copy of your
14 Facebook data and provide all documentation from June 3, 2019 to Present. If you are
15 withholding any information for privacy reasons, please produce a privilege log and identify
16 with specificity what is being withheld. (Facebook – Settings – “Download a copy of your
17 Facebook data). Also, please produce a complete copy of your Instagram data and provide all
18 post-INCIDENT documentation ([https://www.cnet.com/how-to/how-to-download-all-your-
19 instagram-data/](https://www.cnet.com/how-to/how-to-download-all-your-instagram-data/)).

20 **RESPONSE:**

21 **REQUEST FOR PRODUCTION NO. 78:** Please produce a complete copy of your
22 Instagram data and provide all documentation from June 3, 2019 to Present. If you are
23 withholding any information for privacy reasons, please produce a privilege log and identify
24 with specificity what is being withheld. <https://help.instagram.com/181231772500920>.

RESPONSE:

1 **REQUEST FOR PRODUCTION NO. 79:** Please produce copies of all calendars (including
2 electronic calendars on Microsoft Outlook, Google, or any other electronic or web-based
3 program and electronic calendars maintained on a tablet device or smart phone) that you
4 maintained for personal use or business use, between June 3, 2019 to Present.

5 **RESPONSE:**

6 **REQUEST FOR PRODUCTION NO. 80:** Please produce copies of all photographs and
7 videos (including metadata) showing you engaged in any exercise, recreational activities, or
8 on vacation, from June 3, 2019 - Present. Your search should include any phones and laptops
9 you've had since the accident, your social media pages, and any other location you store
10 photographs. At a minimum, your searches should include "exercise," "recreation," "and
11 "vacation."

12 **RESPO**

13 **NSE:**

14 **REQUEST FOR PRODUCTION NO. 81:** Please produce a copy of your transcript from
15 Edmonds College.

16 **RESPONSE:**

17 **REQUEST FOR PRODUCTION NO. 82:** Please produce copies of all documents in your
18 possession relating to obtaining your paralegal certificate from Edmonds College.

19 **RESPONSE:**

20 **REQUEST FOR PRODUCTION NO. 83:** Please produce copies of all text messages, cell
21 phone call detail, and cell phone photos from March 1, 2023.

22 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 84:** Please all financial transaction logs showing you
checking and credit card activity from June 3, 2020-Present.

2 **RESPONSE:**

3
4
5 **REQUEST FOR PRODUCTION NO. 85:** Please produce all of your Apple Photo
Memories between June 3, 2019 to Present.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION NO. 86:** Please produce all written communications you
9 have received from others from your website swedishclub411.com.

10 **RESPONSE:**

11
12 **REQUEST FOR PRODUCTION NO. 87:** Please produce your contract and all
communications with any process servers relating to this case.

13 **RESPONSE:**

14
15 **REQUEST FOR PRODUCTION NO. 88:** Please produce invoices and receipts from all
16 expenses relating to your Amended Complaint, its allegations and claims.

17 **RESPONSE:**

18
19 **REQUEST FOR PRODUCTION NO. 89:** Please produce any contracts (other than attorney
20 ones) that you have entered into with others relating to funding your websites.

21 **RESPONSE:**

22 **REQUEST FOR PRODUCTION NO. 90:** Please produce all documents relating to Nordic
23 Heritage Foods, including business documents, invoices, receipts, photographs, emails,
written communications with others, and proof of expenses, revenue, and profit.

24 **RESPONSE:**

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

REQUEST FOR PRODUCTION NO. 91: Please produce all documents you have prepared as a paralegal under the formal supervision of an attorney.

RESPONSE:

REQUEST FOR PRODUCTION NO. 92: Please produce all documents you have submitted and received by EEOC.

RESPONSE:

REQUEST FOR PRODUCTION NO. 93: Please produce all documents you have submitted and received by the Washington State Human Rights Commission

RESPONSE:

REQUEST FOR PRODUCTION NO. 94: Please produce all documents you have submitted and received by the Seattle Office of Civil Rights.

RESPONSE:

REQUEST FOR PRODUCTION NO. 95: Please produce all documents showing you had Kitchen Management Experience when you applied for jobs at the Swedish Club.

RESPONSE:

REQUEST FOR PRODUCTION NO. 96: Please produce all documents showing damages relating to your March 1, 2023 claims against Sharon Lucas.

RESPONSE:

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

REQUEST FOR PRODUCTION NO. 97: Please produce current CV, and any CVs you have shared with anyone else since June 3, 2022.

RESPONSE:

REQUEST FOR PRODUCTION NO. 98: Please produce copies of all current paid memberships and subscriptions.

RESPONSE:

REQUEST FOR PRODUCTION NO. 99: Please produce copies of invoices, receipts, and correspondence with others relating to Swedish411.org.

RESPONSE:

REQUEST FOR PRODUCTION NO. 100: Please produce copies of any personal research and reports regarding any Defendants in this lawsuit.

RESPONSE:

DECLARATION OF RESPONDING PARTY

I declare under the penalty of perjury under the laws of the State of Washington that I am the Plaintiff in this action and am authorized to make the foregoing answers. I declare that 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.

ELIZABETH A. CAMPBELL, Pro se Plaintiff

1 **CERTIFICATE OF SERVICE**

2 I, Leyda Greenwood, certify that on April 1, 2024 I caused to be served a true and correct
3 copy of the foregoing INTERROGATORIES TO PLAINTIFF via the method indicated below
4 and addressed to the following:

5 *Plaintiff Pro Se*
6 Elizabeth A. Campbell
7 3826 24th Ave W
8 Seattle, WA 98199
9 206-769-8459
10 neighborhoodwarrior@gmail.com
11 Legal Messenger
12 U.S. Mail
13 E-mail
14 KCLGR 30 electronic service

Attorneys for Defs Hayes & Leander
John Taylor Bender, WSBA #49658
Corr Cronin LLP
1015 Second Ave, Fl 10
Seattle, WA 98104
206-625-8600
jbender@corrchronin.com
tuy@corrchronin.com
slarussa@corrchronin.com
 Legal Messenger
 U.S. Mail
 E-mail
 KCLGR 30 electronic service

12 *Attorneys for Defs Lane Powell & Vivian*
13 Rachel Tallon Reynolds, WSBA #38750
14 Chuqiao Wang, WSBA #57196
15 Wilson, Elser, Moskowitz, Edelman &
16 Dicker, LLP
17 520 Pike St, Ste 1515
18 Seattle, WA 98101
19 206-709-5900
20 Rachel.t.reynolds@wilsonelser.com
21 Chuqiao.wang@wilsonelser.com
22 Liz.pina@wilsonelser.com
23 Legal Messenger
24 U.S. Mail
 E-mail
 KCLGR 30 electronic service

Def Vi Reno Pro Se
Vi Jean Reno, WSBA #9385
Law Offices of Vi Jean Reno
1420 Fifth Ave, Ste 3000
Seattle, WA 98101
206-622-4100
vjreno@renolawsea.com
 Legal Messenger
 U.S. Mail
 E-mail
 KCLGR 30 electronic service

Attorney for Defs Lane Powell & Vivian
Charles C. Huber, WSBA #18941
Lane Powell PC
1420 Fifth Ave, Ste 4200
PO Box 91302
Seattle, WA 98111
206-223-7000
huberc@lanepowell.com
 Legal Messenger
 U.S. Mail
 E-mail
 KCLGR 30 electronic service

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

3 s/Leyda Greenwood
4 Mix Sanders Thompson, PLLC
5 1601 5th Ave, Suite 1800
6 Seattle, WA 98101
7 Tel: 206-678-1000
8 Fax: 888-521-5980

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24