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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, 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

SUBPOENA IN A CIVIL CASE

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,

Defendants.

8 **TO: JULIE PHEASANT-ALBRIGHT**

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

11 A complete copy of:

- 12 1. All written communications with or regarding Elizabeth Campbell, including,
13 but not limited to, emails, text messages, letters, recordings, invoices, receipts,
14 contracts.
- 15 2. All written communications with others relating to Elizabeth Campbell,
16 including, but not limited to, emails, text messages, letters, and recordings. For
17 emails and texts and other documents, please use search terms "Elizabeth
18 Campbell," "Campbell," and "Swedish Club."
- 19 3. All recordings involving any Swedish Club/Swedish Cultural Center member
20 or members (past or present) in your possession.
- 21 4. All written communications with any other person or business entity relating to
22 <http://saveourswedishclub.org> (referenced on page 101 of Campbell's
23 Amended Complaint).
- 24 5. All written communications with board members or employees of the Swedish
Cultural Center/Swedish Club, including, but not limited to, emails, text
messages, letters, recordings, invoices, receipts, contracts.

This request includes any and all data in its electronic or hard copy form and is limited
to **July 15, 2019 to present.**

| | |
|---|--|
| <p style="text-align: center;">Place:</p> | <p style="text-align: center;">Date and Time</p> |
| <p style="text-align: center;"> mrhodes@mixsanders.com levda@mixsanders.com jennifer@mixsanders.com </p> | <p style="text-align: center;"> May 1, 2024 10:00 AM </p> |
| <p style="text-align: center;">Issuing Officer Signature, Title, Address, Phone No.</p> | <p style="text-align: center;">Date</p> |
| <p> <u>s/Michael K. Rhodes</u> Michael K. Rhodes, WSBA No. 41911 Kenna A. Duckworth, WSBA No. 54004 Attorneys for Lucas, Smith, Sund, Norgren, Albright, Emerson, Odderson, Salmon, Miller, Schee, Snyder, Lindstrom, Johansson, Faino, Alaimo, Swedish Cultural Center, and Swedish Club Foundation Mix Sanders Thompson, PLLC 1420 Fifth Avenue, Suite 2200 Seattle, WA 98101 206-521-5989 </p> | <p style="text-align: center;">April 10, 2024</p> |
| <p>Proof of Service</p> | |
| <p>Date Served:</p> <p>Place of Service: 3053 NW 65th Ave Apt 203 Seattle WA 98117</p> <p>Manner of Service: Process Server</p> <p>Served on:</p> <p>Served by:</p> <p>Title:</p> | |
| <p>Declaration of Server</p> | |
| <p>I declare under penalty of perjury under the laws of the State of Washington that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____, 2024 at Seattle, WA</p> <p style="text-align: center;">_____</p> <p style="text-align: center;">Process Server</p> | |

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

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

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

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

18 (i) fails to allow reasonable time for compliance;
19 (ii) fails to comply with RCW 5.56.010 or subsection (e)(2)
20 of this rule;

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

20 (iv) subjects a person to undue burden, provided
21 that, the court may condition denial of the motion upon a
22 requirement that the subpoenaing party advance the
23 reasonable cost of producing the books, papers, documents,
24 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) When information subject to a subpoena is
withheld on a claim that it is privileged or
subject to protection as trial preparation
materials, the claim shall be made expressly and
shall be 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.

1 **CERTIFICATE OF SERVICE**

2 I, Leyda Greenwood, certify that on April 10, 2024 I caused to be served a true and
3 correct copy of the foregoing SUBPOENA IN A CIVIL CASE 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

5 *Attorneys for Defs Hayes & Leander*

6 John Taylor Bender, WSBA #49658
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10 206-625-8600

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 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