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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.

LARS CHRISTIAN MATTHIESEN,
SHARON LUCAS, TOENE HAYES,
KRISTINE LEANDER, SARAH D.
ALAIMO, SWEDISH CULTURAL CENTER
d/b/a the SWEDISH CLUB, GARY SUND,
SHAMA ALBRIGHT, MOLLY OLSON
SMITH, MARY EMERSON, IB R.
ODDERSON, LANGDON L. MILLER, NEIL
SNYDER, KRIS E. JOHANSSON, MARTIN
K. JOHANSSON, ANNA FAINO and LANE
POWELL PC,

Defendants.

No. 23-2-25128-8 SEA

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

TO: Defendant Ib Odderson:

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) Supplemental Responses. Include all responsive information available. For documents, produce in electronic format if possible, per CR

PLAINTIFF’S INTERROGATORIES
AND RFPS TO DEFENDANT Ib Odderson – 1

Elizabeth A. Campbell, MPA
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Seattle, WA 98199
206-769-8459
neighborhoodwarrior@gmail.com

1 34(b)(2)(E). Objections must state specific grounds (CR 33(b)(4), 34(b)(2)(C)). If claiming
2 privilege, provide a privilege log (CR 26(b)(5)).

3 **DEFINITIONS**

4
5 Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

6 1. **“DATE” – Date/Time Period.** Unless a specific date or time period is expressly stated in
7 an interrogatory, the time period covered by the interrogatory shall, by default, be from January
8 1, 2017, to the present date of April 16, 2025

9 2. **“DOCUMENTS”** means all hard copy and electronic writings of every kind including,
10 but not limited to, the original and any copy of all records, e-mails, letters, correspondence,
11 appointment books, diaries, files, notes, statements, memoranda, or minutes of meetings,
12 photographs, video, conferences, telephone calls, receipts, written reports or opinions of
13 investigators or experts, status reports, financial statements, audit reports, tax returns, estimates,
14 inventories, contracts, agreements, articles of incorporation, bylaws, stock book, minute book,
15 deed, security agreement, mortgage, deed of trust, title or other insurance policy, report, record,
16 study, hand written note, map, drawing, working paper, chart, paper, draft, index, tape,
17 microfilm, data sheet, data processing card, computer printout, computer program, check, bank
18 statement, passbook, including information recorded and stored electronically, however
19 produced or reproduced, within your possession or subject to your control, of which you have
20 knowledge or to which you have or have had access, or of which any of your agents, attorneys,
21 accountants or consultants have had knowledge.

22 3. **“DEFENDANT GROUP(S)”** means the groups of defendants and the defense counsel(s)
23 that represent them:

24 **Group 1:** Kristine Leander (former Executive Director) and Toene Hayes (former staff
25 accountant), represented by Karen Kalzer.

26 **Group 2:** The Swedish Club, Langdon Miller (current board president), Kris Johansson (board
27 member), Sharon Lucas (member/volunteer), and Gary Sund (former board president),
28 represented by Brad Bigos and Alex Lopez.

Group 3: Elizabeth Norgren (former Executive Director), Sarah Alaimo (former HR Director),
Shama Albright (former board president), Mary Emerson (former board secretary), Anna Faino
(former board vice president), Martin Johansson (former membership chair), Ib Odderson
(former board member), Molly Olson Smith (former board vice president), and Neil Snyder
(former board member), represented by Megan Starks and Sarah Tatischeff.

Group 4: Lars Matthiesen (club member), represented by Nicholas Larson and Miguel Mendez-
Pintado.

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

5. **“IDENTIFY”– Entity.** When used with reference to an entity, such as a partnership
(either general or limited), joint venture, trust or corporation, to state the full legal name of such

1 entity, each name under which such entity does business, the entity's telephone number and the
2 identity of the chief operating officer, manager, trustee, or other principal representative, and
3 their **CONTACT INFORMATION** as defined below.

4 6. **"IDENTIFY"- Documents.** When used in reference to a document, means the date of
5 preparation of the document, its author, the sender, the recipient, the nature of the document,
6 e.g., letter, memo, tape, or other means of identification sufficient to identify the document, and
7 its present location and custodian. Provide the name, address, and telephone number of the
8 person with possession of the document.

9 7. **"IDENTIFY"- Claims/Lawsuits.** When used in reference to claims or lawsuits means the
10 **CONTACT INFORMATION** of parties and attorneys representing the parties, proceeding
11 number(s), jurisdiction, type of action, and disposition.

12 8. **"Identify" - Witness/Witnesses.** When used in reference to a witness or witnesses,
13 "identify" means an individual who, by virtue of their presence, participation, or sensory
14 perception (e.g., seeing, hearing, or otherwise experiencing), can provide testimony or
15 information about a specific event, occurrence, or issue pertinent to the case. Additionally, the
16 identification shall include a brief description of the specific event, occurrence, or issue to
17 which the witness's knowledge or testimony pertains. This includes providing their **CONTACT**
18 **INFORMATION**, as defined below.

19 9. **"LETTER"** refers to the anonymous letter sent to and received by Plaintiff via the
20 United States Postal Service on March 14, 2025", stating:

21 a. "A concerned member wonders how the infamous Kristine Leander has so easily fallen
22 off your radar. After all, she is the evil behind all of this."

23 b. "How soon you seem to have forgotten her fake friendship? How quick you were to
24 forgive the salacious gossip she spread about you around the club and among the members.
25 One could never expect such quick forgiveness for one who acted as a true 'mean girl'
26 towards you for the entirety of your relationship. Is it not her fault that you and Lars had such
27 a clamorous and public argument at the Swedish club?"

28 c. "Is Kristine not the reason you no longer work there? How quickly you forget that
Kristine is the reason you are no longer allowed to enter the club. This, among many other
immoral things were all a part of her scheme from the beginning."

d. "You" or "Your" refers to the Defendant to whom the interrogatory is directed, including
agents, employees, or representatives acting on their behalf.

e. "Signed,

1 f. “A concerned member who simply wonders how she so easily has gotten away with her
2 wrongs towards you.”¹

3
4 10. “**PERSON**” includes a natural person, company, firm, association, organization,
5 partnership, business, trust, limited liability company, corporation, or public entity.

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

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

13 Dated this 16th Day of April, 2025

14 ELIZABETH A. CAMPBELL, MPA

15 

16 Elizabeth A. Campbell, MPA

17 Plaintiff Pro Se

18 3826 24th Ave W

19 Seattle, WA 98199

20 Tel/Text: 206-769-8459

21 Fax: 206-283-6300

22 neighborhoodwarrior@gmail.com

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¹ Unknown. “Letter to Elizabeth Campbell.” United States Postal Service. Postmarked March 6, 2025.

INTERROGATORIES

1
2 **INTERROGATORY NO. 1.: Identity of the Letter’s Author:** Do you have any knowledge
3 of the identity of the person or entity who wrote or sent the Letter to Plaintiff? If yes, state the
4 identity and describe how you obtained this knowledge; from July 1, 2024 to the present.

5 **ANSWER:**

6
7 **INTERROGATORY NO. 2.: Involvement in the Letter:** Did you, or anyone acting on
8 your behalf, author, send, or contribute to the drafting or mailing of the Letter? If yes, provide
9 details, including dates, methods, and reasons for your involvement or gaining knowledge of
10 the preparation, transmission of it; from December 1, 2024 to the present.

11 **ANSWER:**

12
13 **INTERROGATORY NO. 3.: Kristine Leander’s Role:** The Letter states that “Kristine
14 Leander is the evil behind all of this” and references a “scheme.” Describe any actions,
15 statements, or plans by Kristine Leander, or by you or one of your fellow defendants, or any
16 other person, that you are aware of relating to the termination of Plaintiff’s membership in the
17 Swedish Club, and exclusion from the Swedish Club as a member, as a member of the public,
18 including dates, reasons, and any notices provided to Plaintiff, or of the events described in the
19 First Amended Complaint related to Plaintiff’s Swedish Club membership; from August 15,
20 2020 to present.

21 **ANSWER:**

22 **INTERROGATORY NO. 4.: Alleged Gossip:** The Letter claims Kristine Leander spread
23 “salacious gossip” about Plaintiff “around the club and among the members.” Identify all
24 instances you are aware of where Kristine Leander, you, or any other Defendant, member, or
25 other person discussed Plaintiff with club members or staff, including dates, locations, identity
26 of the participants, and the content of those discussions from August 15, 2020 to the present.

27 **ANSWER:**

28 **INTERROGATORY NO. 5.: Public Argument with Lars Matthiesen:** The Letter
references a “clamorous and public argument” between Plaintiff and Defendant Lars Matthiesen

1 at the Swedish Club,² attributing it to Kristine Leander. State whether you have knowledge of
2 this incident, including the date, location, witnesses, and any role Kristine Leander played in
3 causing or escalating it; from January 1, 2021 to the present.

4 **ANSWER:**

5
6 **INTERROGATORY NO. 6.: Employment Termination:** The Letter asserts that “Kristine
7 is the reason you no longer work there.” Describe all actions taken by Kristine Leander, you, or
8 other Defendants, Swedish Club employees or board members, or third parties, that contributed
9 to Plaintiff’s termination from employment at the Swedish Club, including the identity of any
10 person, dates, reasons provided, and any related communications August 1, 2020 to the present.

11 **ANSWER:**

12 **INTERROGATORY NO. 7.:Exclusion from the Club:** The Letter states that “Kristine is
13 the reason you are no longer allowed to enter the club.” Identify all decisions, policies, or
14 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
15 members, or third parties, that led to the termination of Plaintiff’s membership and exclusion
16 from the Swedish Club as a member, as a member of the public, including dates, reasons, and
17 any notices provided to Plaintiff; from September 1, 2020 to the present.

18 **ANSWER:**

19 **INTERROGATORY NO. 8.:Exclusion from the Club:** Identify all decisions, policies, or
20 actions by Kristine Leander, you, or other Defendants, Swedish Club employees or board
21 members, or third parties, that led to the termination of any Swedish Club member’s
22 membership and exclusion from the Swedish Club as a member, as a member of the public,
23 including dates, reasons, and any notices provided to those members; from June 1, 2019 to the
24 present.

25 **ANSWER:**

26 **INTERROGATORY NO. 9.: Scheme Allegation:** The Letter claims Plaintiff’s termination
27 and exclusion were “part of [Kristine Leander’s] scheme from the beginning.” Describe any
28 plans, agreements, or coordinated efforts by you or among Defendants or with third parties, to

² On December 17, 2021

1 terminate Plaintiff's employment or the termination of Plaintiff's membership, including
2 participants, timelines, and objectives; from August 15, 2020 to the present.

3 **ANSWER:**

4
5 **INTERROGATORY NO. 10.: Witnesses:** Identify all individuals (by name, address, and
6 phone number, if known) who have knowledge of the events or statements referenced in the
7 Letter, including those related to Kristine Leander's actions toward Plaintiff; from August 15,
8 2020 to the present.

9 **ANSWER:**

10
11 **INTERROGATORY NO. 11.: Resignation:** State the date you resigned from the Swedish
12 Club Board of Directors and provide a detailed explanation of all reasons for your resignation.

13 **ANSWER:**

14
15 **INTERROGATORY NO. 12.: Resignation:** Did you discuss Elizabeth Campbell's
16 lawsuit, membership status, employment termination, or alleged mistreatment with other board
17 members during your tenure? If so, provide details, including dates and participants.

18 **ANSWER:**

19
20 **INTERROGATORY NO. 13.: Resignation:** Describe the events, interactions, or any
21 communications with Kristine Leander, Elizabeth Norgren, Langdon Miller, other board
22 members, or Club members that preceded and influenced your resignation, including specific
23 dates.

24 **ANSWER:**

25
26 **INTERROGATORY NO. 14.: Resignation:** Did you raise concerns or express
27 dissatisfaction with the Swedish Club's operations management, personnel decisions, cultural
28 programming, financial transparency, financial management or decisions, board governance to
any individual prior to resigning? If so, identify the recipients and summarize the discussions.

ANSWER:

REQUESTS FOR PRODUCTION

1
2 **REQUEST FOR PRODUCTION NO. 1) Documents Related to the Letter:** All
3 documents, communications, or drafts related to the creation, sending, or receipt of the Letter,
4 including envelopes, notes, or correspondence discussing its contents or purpose; from
5 December 1, 2024 to the present.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION NO. 2) Communications by Kristine Leander:** All
9 documents, including emails, texts, memos, or notes, authored by or involving Kristine Leander
10 that mention Plaintiff, Plaintiff’s employment, or Plaintiff’s membership at the Swedish Club
11 from August 15, 2020 to the present.

12 **RESPONSE:**

13 **REQUEST FOR PRODUCTION NO. 3) Gossip Evidence:** All documents reflecting
14 statements or gossip about Plaintiff made by Kristine Leander, other Defendants, Swedish Club
15 employees or members, or third parties, as referenced in the Letter, including dates and
16 recipients; from August 15, 2020 to the present.

17 **RESPONSE:**

18
19 **REQUEST FOR PRODUCTION NO. 4) Public Argument Records:** All documents,
20 reports, or communications held, received, or transmitted by You related to the “clamorous and
21 public argument” between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of
22 December 17, 2021, including witness statements, incident logs, or correspondence about the
23 incident; from December 17, 2021 to the present.

24 **RESPONSE:**

25 **REQUEST FOR PRODUCTION NO. 5) Employment Termination Records:** All
26 documents related to Plaintiff’s termination from employment at the Swedish Club, including
27 personnel files, performance reviews, disciplinary records, emails, meeting notes or
28 communications involving Kristine Leander or other Defendants, Swedish Club employees,
board members, or third parties; from March 1, 2021 to present.

RESPONSE:

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3 **REQUEST FOR PRODUCTION NO. 6) Membership Exclusion Records:** All
4 documents related to Plaintiff's exclusion from the Swedish Club as a member, including
5 membership records, board minutes, board directors'/executive directors' emails between each
6 other or to Plaintiff, or notices sent to Plaintiff, particularly those involving Plaintiff's
7 membership, or Kristine Leander, or communications involving Kristine Leander or other
8 Defendants, Swedish Club employees, board members, or third parties; from August 15, 2020
9 to the present.

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 7) Scheme Documentation:** All documents
12 evidencing any plan, agreement, or "scheme" by Kristine Leander or other Defendants to
13 terminate Plaintiff's employment or revoke Plaintiff's membership, as alleged in the Letter,
14 including internal communications or directives; from December 1, 2021 to the present.

15 **RESPONSE:**

16 **REQUEST FOR PRODUCTION NO. 8) Defendant Communications:** All
17 communications between Defendants from October 1, 2020 to the present discussing Plaintiff,
18 the Letter, or the claims in this lawsuit.

19 **RESPONSE:**

20
21 **REQUEST FOR PRODUCTION NO. 9) Defendant Resignation:** Produce all emails,
22 text messages, or other written communications sent or received by you between January 1,
23 2021, and the present relating to your resignation from the Swedish Club Board of Directors.

24 **RESPONSE:**

25
26 **REQUEST FOR PRODUCTION NO. 10) Defendant Resignation:** Produce a copy of
27 your resignation letter or any written notice of resignation submitted to the Swedish Club,
28 including any drafts thereof.

RESPONSE:

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REQUEST FOR PRODUCTION NO. 11) Defendant Resignation: Produce all responses you received from board members, Swedish Club staff, or members regarding your resignation, whether in writing or electronic form.

RESPONSE:

REQUEST FOR PRODUCTION NO. 12) Defendant Resignation: Produce any records, emails, or notes in your possession reflecting discussions about the Swedish Club’s finances, management, or Elizabeth Campbell’s treatment during your tenure.

RESPONSE:

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 _____, 2025 at _____, Washington.

Name DEFENDANT - IB ODDERSON

1 **CERTIFICATE OF SERVICE**

2 I, Elizabeth A. Campbell, certify that on April 16, 2025 I caused to be served a true and
3 correct Word and PDF copy of the foregoing INTERROGATORIES AND REQUEST FOR
4 PRODUCTION TO DEFENDANT IB ODDERSON via the method indicated below and
5 addressed to the following:

6 Brad Bigos, WSBA No. 52297
7 Alexandro Lopez, WSBA No. 62867
8 O'HAGAN MEYER, PLLC
9 1420 Fifth Avenue, Suite 2200
10 Seattle, WA 98101
11 Tel: (206) 844-1350
12 Email: Bbigos@ohaganmeyer.com
13 Email: alopez@ohaganmeyer.com
14 CM/ECF System
15 KC E-File Service
16 Email
17 Legal Messenger
18 U.S. Mail
19 WA State App Courts' eFiling Portal

Megan F. Starks, WSBA No. 39640
Sarah A. Tatistcheff, WSBA No. 51098
PATTERSON BUCHANAN FOBES &
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WA State App Courts' eFiling Portal

20 *Attorney for Defendant Swedish*
21 *Cultural Center d/b/a the Swedish Club,*
22 *K. Johansson, Lucas, Miller, and Sund*

Attorney for Defendant Alaimo, Albright,
Emerson, Faino, M. Johansson, Norgren,
Odderson, Smith, and Snyder

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9 **Attorney for Def Matthiesen**

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 WA State App Courts' eFiling Portal

Attorney for Defs Hayes, Leander

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

13 DATED April 16, 2025, at Seattle, Washington.

15 

16 Elizabeth A. Campbell, MPA
17 Plaintiff, Pro Se
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Seattle, WA 98199
18 Tel/Text: 206-769-8459
19 Fax: 206-283-6300
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