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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
KRIS JOHANSSON**

TO: Defendant Kris Johansson:

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,

PLAINTIFF'S INTERROGATORIES
AND RFPS TO DEFENDANT KRIS JOHANSSON – 1

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

1 including the duty set forth in CR 26(e) Supplemental Responses. Include all responsive
2 information available. For documents, produce in electronic format if possible, per CR
3 34(b)(2)(E). Objections must state specific grounds (CR 33(b)(4), 34(b)(2)(C)). If claiming
4 privilege, provide a privilege log (CR 26(b)(5)).

5 DEFINITIONS

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

7 1. **“DATE”** – Date/Time Period. Unless a specific date or time period is expressly stated in
8 an interrogatory, the time period covered by the interrogatory shall, by default, be from January
9 1, 2017, to the present date of April 16, 2025.

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

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

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

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

1 5. **“IDENTIFY”– Entity.** When used with reference to an entity, such as a partnership
2 (either general or limited), joint venture, trust or corporation, to state the full legal name of such
3 entity, each name under which such entity does business, the entity’s telephone number and the
4 identity of the chief operating officer, manager, trustee, or other principal representative, and
5 their **CONTACT INFORMATION** as defined below.

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

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

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

21 9. **“LETTER”** refers to the anonymous letter sent to and received by Plaintiff via the
22 United States Postal Service on March 14, 2025”, stating:

23 a. “A concerned member wonders how the infamous Kristine Leander has so easily fallen
24 off your radar. After all, she is the evil behind all of this.”

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

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.

1 e. “Signed,

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

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

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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,
including dates, reasons, and any notices provided to Plaintiff, or of the events described in the
First Amended Complaint related to Plaintiff’s Swedish Club membership; from August 15,
2020 to present.

18 **ANSWER:**

19
20 **INTERROGATORY NO. 4.: Alleged Gossip:** The Letter claims Kristine Leander spread
21 “salacious gossip” about Plaintiff “around the club and among the members.” Identify all
22 instances you are aware of where Kristine Leander, you, or any other Defendant, member, or
23 other person discussed Plaintiff with club members or staff, including dates, locations, identity
of the participants, and the content of those discussions from August 15, 2020 to the present.

24 **ANSWER:**

25
26 **INTERROGATORY NO. 5.: Public Argument with Lars Matthiesen:** The Letter
27 references a “clamorous and public argument” between Plaintiff and Defendant Lars Matthiesen
28

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:**

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11 **NOTICE: Interrogatories No. 11 to No. 33 are directed to You, Kris**
12 **Johansson, and is intended to apply to all defendants within your**
13 **Defendant Group who are represented by your shared counsel and**
14 **who have filed joint or substantively identical answers and affirmative**
15 **defenses.**

16 **INTERROGATORY NO. 11.:** If any co-defendant within your Defendant Group asserts a
17 different position than the ones in DEFENDANTS SWEDISH CULTURAL CENTER, LANGDON
18 MILLER, KRIS JOHANSSON, GARY SUND, AND SHARON LUCAS ANSWER AND
19 AFFIRMATIVE DEFENSES TO PLAINTIFF'S FIRST AMENDED COMPLAINT IN CAMPBELL V.
20 LUCAS, ET AL., CASE NO. 23-2-25195-4 SEA,³ please identify that defendant or defendants and
21 specify the variance.

22 **ANSWER:**

23 **Interrogatories Addressing Denials**

24 **INTERROGATORY NO. 12.:** Identify each paragraph in the First Amended Complaint
25 (FAC) that you denied in your Answer, excluding those paragraphs you expressly admitted (e.g.,
26 Paragraphs 2.1, 3.2, 3.6, 3.13, 3.15, 3.19, 3.25, 3.26, 3.27, 4.2, 4.6, 4.13, 4.15, 4.19).

27 **ANSWER:**

28 **INTERROGATORY NO. 13.:** For each paragraph identified in response to Interrogatory 12,
state all facts that support your denial.

³ King County Court Lead Case No. 23-2-25128-8, Dkt. Item No. 138

1 **ANSWER:**

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4 **INTERROGATORY NO. 14.:** For each fact stated in response to Interrogatory 12, identify
5 all documents that support that fact, including the document's title, date, author, and current
6 custodian.

7 **ANSWER:**

8
9 **INTERROGATORY NO. 15.:** For each fact stated in response to Interrogatory 12, list all
10 witnesses who have knowledge of that fact, including their full name, contact information
11 (address, phone number, email), and a summary of their knowledge.

12 **ANSWER:**

13
14 **INTERROGATORY NO. 16.:** For each paragraph identified in response to Interrogatory 12,
15 state all legal authorities (e.g., statutes, case law, regulations) you rely upon to support your
16 denial, and explain how each authority applies to the specific allegation denied.

17 **ANSWER:**

18
19 **Interrogatories Addressing Affirmative Defenses**

20 **INTERROGATORY NO. 17.:** For your affirmative defense that Plaintiff failed to state a
21 claim (Defense 1), specify:

- 22 a. Each cause of action in the FAC (e.g., assault, battery, defamation) you contend fails to state a
23 claim;
24 b. The factual or legal elements you believe are insufficiently alleged for each cause of action;
25 c. All legal authorities supporting your contention;
26 d. All facts, documents, and witnesses supporting your position.

27 **ANSWER:**

28 **INTERROGATORY NO. 18.:** For your affirmative defense that Plaintiff's causes of action
may be time-barred (Defense 2), specify:

- a. Each cause of action you contend is time-barred;

- 1 b. The applicable statute of limitations for each;
2 c. The date you believe each claim accrued and why;
3 d. All facts, documents, and witnesses supporting your contention.

4 **ANSWER:**

5
6 **INTERROGATORY NO. 19.:** For your affirmative defense of failure to join necessary parties (Defense 3), specify:

- 7 a. Each person or entity you believe is necessary for a just adjudication but not joined;
8 b. Why each is indispensable under CR 19;
9 c. Their contact information, if known;
10 d. All facts, documents, and witnesses supporting your contention.

11 **ANSWER:**

12
13 **INTERROGATORY NO. 20.:** For your equitable defenses (Defense 4: laches, waiver, estoppel, unclean hands), specify for each defense:

- 14 a. The specific actions or omissions by Plaintiff supporting the defense;
15 b. The dates of those actions or omissions;
16 c. How they bar Plaintiff's claims;
17 d. All facts, documents, and witnesses supporting your contention.

18 **ANSWER:**

19
20 **INTERROGATORY NO. 21.:** For your defense that your actions were necessary to protect a legitimate business interest and without malice (Defense 5), specify:

- 21 a. The legitimate business interest you claim to have protected;
22 b. How your actions were necessary to protect it;
23 c. Why you believe your actions were without malice;
24 d. All facts, documents, and witnesses supporting your contention.

25 **ANSWER:**

26
27 **INTERROGATORY NO. 22.:** For your causation-related defenses (Defenses 6, 9, 13, 14, 17), explain why you believe your actions did not cause Plaintiff's alleged damages, specifying:

- 28 a. Any intervening causes you allege;
b. How Plaintiff's actions or third-party actions contributed to her damages;
c. All facts, documents, and witnesses supporting your contention.

1 **ANSWER:**

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4 **INTERROGATORY NO. 23.:** For your defense that Plaintiff's damages resulted from her
5 own actions or failure to mitigate (Defense 10), specify:

- 6 a. Each action or omission by Plaintiff you claim caused her damages;
7 b. The dates of those actions or omissions;
8 c. How they contributed to her harm or bar her claims;
9 d. All facts, documents, and witnesses supporting your contention.

10 **ANSWER:**

11 **INTERROGATORY NO. 24.:** For your defense that Plaintiff's lawsuit is asserted in bad
12 faith or for an improper purpose (Defense 20), state:

- 13 a. All facts supporting this contention;
14 b. Any evidence of Plaintiff's intent;
15 c. All legal authorities you rely upon to assert a CR 11 violation;
16 d. All documents and witnesses supporting your contention.

17 **ANSWER:**

18 **INTERROGATORY NO. 25.:** For your defenses related to scope of employment and
19 individual liability (Defenses 18, 21, 23), specify for each individual defendant:

- 20 a. Their role and duties at the Swedish Club during the relevant period;
21 b. Why their actions were within the scope of employment;
22 c. Why they are not individually liable;
23 d. All facts, documents, and witnesses supporting your contention.

24 **ANSWER:**

25 **INTERROGATORY NO. 26.:** For your disability discrimination defense (Defense 22),
26 describe:

- 27 a. The interactive process you claim Plaintiff failed to engage in;
28 b. Dates and content of any related communications or meetings;
29 c. Why this alleged failure bars her claim;
30 d. All facts, documents, and witnesses supporting your contention.

ANSWER:

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3 **INTERROGATORY NO. 27.**: For your hostile work environment defenses (Defenses 24,
25), specify:

- 4 a. All steps you took to prevent and correct alleged harassment or discrimination;
5 b. Why Plaintiff's failure to use corrective opportunities bars her claim;
6 c. Why employee conduct cannot be imputed to the Swedish Club;
7 d. All facts, documents, and witnesses supporting your contention.

8 **ANSWER:**

9
10 **INTERROGATORY NO. 28.**: For your Consumer Protection Act defense (Defense 26),
explain:

- 11 a. Why you believe your actions were reasonable and not injurious to the public interest;
12 b. Specific examples supporting your position;
13 c. All legal authorities you rely upon;
14 d. All facts, documents, and witnesses supporting your contention.

15 **ANSWER:**

16 **INTERROGATORY NO. 29.**: For your negligent hiring, supervision, and retention defense
17 (Defense 27), describe:

- 18 a. The hiring process for each employee involved in the FAC's allegations (e.g., background
19 checks, references);
20 b. Why you believe you exercised reasonable care;
21 c. What you knew or should have known about their unfitness;
22 d. All facts, documents, and witnesses supporting your contention.

23 **ANSWER:**

24 **INTERROGATORY NO. 30.**: For your premises liability defense (Defense 28), specify:

- 25 a. All dangerous conditions on the Swedish Club premises you were aware of or should have
26 been aware of during the relevant period;
27 b. Why you believe you had no actual or constructive notice;
28 c. All facts, documents, and witnesses supporting your contention.

ANSWER:

1 **INTERROGATORY NO. 31.:** For your breach of contract defenses (Defenses 29, 30),
2 specify:

- 3 a. All contracts between Plaintiff and Defendants you acknowledge or dispute;
4 b. Why you believe no valid contract existed or no breach occurred;
5 c. All facts, documents, and witnesses supporting your contention.

6 **ANSWER:**

7
8 **INTERROGATORY NO. 32.:** For any affirmative defense not specifically addressed in
9 Interrogatories 17 to 31 (e.g., Defenses 7, 8, 11, 12, 15, 16), state:

- 10 a. All facts supporting that defense;
11 b. All legal authorities you rely upon;
12 c. All documents and witnesses supporting your contention.

13 **ANSWER:**

14 **Interrogatories Addressing Potential CR 11 Violations**

15 **INTERROGATORY NO. 33.:** For any contention in your Answer or affirmative defenses
16 that Plaintiff's claims are frivolous or violate CR 11, state:

- 17 a. The specific factual basis for this contention;
18 b. All legal authorities supporting your position;
19 c. When and how you formed this belief;
20 d. All documents and witnesses supporting your contention.

21 **ANSWER:**

22 **REQUESTS FOR PRODUCTION**

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

27 **RESPONSE:**

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

5 **RESPONSE:**

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

10 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 4) Public Argument Records:** All documents,
12 reports, or communications held, received, or transmitted by You related to the "clamorous and
13 public argument" between Plaintiff and Lars Matthiesen at the Swedish Club on the evening of
14 December 17, 2021, including witness statements, incident logs, or correspondence about the
15 incident; from December 17, 2021 to the present.

16 **RESPONSE:**

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

22 **RESPONSE:**

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

RESPONSE:

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3 **REQUEST FOR PRODUCTION NO. 7) Scheme Documentation:** All documents
4 evidencing any plan, agreement, or “scheme” by Kristine Leander or other Defendants to
5 terminate Plaintiff’s employment or revoke Plaintiff’s membership, as alleged in the Letter,
6 including internal communications or directives; from December 1, 2021 to the present.

7
8
9 **RESPONSE:**

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

13
14 **RESPONSE:**

15 **NOTICE: Request for Production No. 9 to 18 are directed to You, Kris**
16 **Johansson, and are intended to apply to all defendants within your**
17 **Defendant Group who are represented by your shared counsel and who**
18 **have filed joint or substantively identical answers and affirmative defenses.**

19 **REQUEST FOR PRODUCTION NO. 9.:** Produce all documents identified in your
20 responses to Interrogatories 11 to 33.

21 **RESPONSE:**

22 **REQUEST FOR PRODUCTION NO. 10.:** Produce all communications (e.g., emails,
23 letters, memos) between any defendant and Plaintiff from January 1, 2020, to the present.

24 **RESPONSE:**

25
26 **REQUEST FOR PRODUCTION NO. 11.:** Produce all communications among defendants
27 or between defendants and Swedish Club employees, board members, or agents regarding
28 Plaintiff or the events alleged in the FAC from January 1, 2020, to the present.

RESPONSE:

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3 **REQUEST FOR PRODUCTION NO. 12.:** Produce Plaintiff's complete employment file,
4 including personnel records, performance reviews, disciplinary actions, and termination
5 documents.

6 **RESPONSE:**

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8 **REQUEST FOR PRODUCTION NO. 13.:** Produce all Swedish Club financial records
9 from January 1, 2020, to the present, including budgets, expenditure reports, and audits.

10 **RESPONSE:**

11
12 **REQUEST FOR PRODUCTION NO. 14.:** Produce all minutes from board and committee
13 meetings held between January 1, 2020, and the present where Plaintiff, her employment, her
14 membership, or the events in the FAC were discussed.

15 **RESPONSE:**

16
17 **REQUEST FOR PRODUCTION NO. 15.:** Produce all Swedish Club policies and
18 procedures in effect from January 1, 2020, to the present, including HR policies, membership
19 rules, anti-harassment policies, and bylaws.

20 **RESPONSE:**

21
22 **REQUEST FOR PRODUCTION NO. 16.:** Produce all complaints, reports, or
23 investigations related to Plaintiff's conduct, performance, or the events alleged in the FAC,
24 including any disciplinary actions taken.

25 **RESPONSE:**

26
27 **REQUEST FOR PRODUCTION NO. 17.:** Produce all Directors and Officers (D&O)
28 insurance policies covering the Swedish Club and its board members from January 1, 2020, to
the present, including communications with insurers regarding this litigation.

RESPONSE:

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REQUEST FOR PRODUCTION NO. 18.: Produce all documents related to legal advice sought or received by the Swedish Club or its board members regarding Plaintiff’s employment, membership, or the events alleged in the FAC.

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 - KRIS JOHANSSON

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 KRIS JOHANSSON 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 &
LEITCH, INC., P.S.
1000 Second Ave., 30th Floor
Seattle, WA 98104
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Email: mstarks@pattersonbuchanan.com
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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 

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