

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

**SEAN LYNN AND
LAURA HAMMETT**

CLAIMANTS

V.

NO. 250191

**UNIVERSITY OF ARKANSAS
FOR MEDICAL SCIENCES**

RESPONDENT

**RESPONSE TO CLAIMANTS'
MOTION FOR PROTECTIVE ORDER ON BEHALF OF
THE UNIVERSITY OF ARKANSAS FOR MEDICAL SCIENCES**

Comes now Respondent, University of Arkansas for Medical Sciences (UAMS), by and through its undersigned counsel, and for its Response to Claimants' Motion for Protective Order, states as follows:

1. UAMS has no intention of releasing publicly any pictures, videos or audio files that Claimants provide in this case. Thus, UAMS does not object to a protective order.
2. Respondent denies that it maintains surveillance videos from patient rooms and denies that it is obligated to retain security footage beyond 21 days without a request to do so or a clearly stated threat of litigation is made requiring a litigation hold.
3. Respondent denies that any pictures, videos or audio files produced by Claimants in this matter will demonstrate illegalities by UAMS or any of its staff. As a result, UAMS requests that the Commission include a provision in the protective order prohibiting Claimants from publicizing pictures, videos or audio files of Respondents' staff

accusing them of any wrongdoing until the Commission is able to hear this case and render a decision.

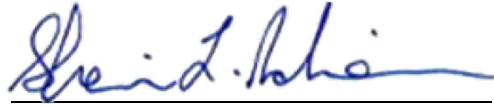
4. Claimants have chosen to avail themselves of the legal process provided by this Commission, and are therefore bound by the attendant laws, rules and orders of the Commission. Because of the Health Insurance Portability and Accountability Act (HIPAA), the Health Information Technology for Economic and Clinical Health Act (HITECH Act), and other state and federal privacy laws, UAMS does not comment on publicly posted pictures, videos or audio files of its patients. Subjecting UAMS' staff to unproven allegations and potential defamatory statements by releasing those items publicly may cause embarrassment for staff and may unnecessarily delay and hinder the progress of this matter before the Commission.
5. UAMS reserves the right to file its own motion for protective order depending on the information Claimants request from UAMS during the discovery process.

WHEREFORE, having responded to Claimants' Motion for Protective Order, Respondent agrees that a Protective Order is appropriate and requests that the Commission include statements in the protective order covering UAMS' staff as well, and for all other relief to which it may be entitled.

Respectfully submitted,

UNIVERSITY OF ARKANSAS
FOR MEDICAL SCIENCES,
Respondent

By:



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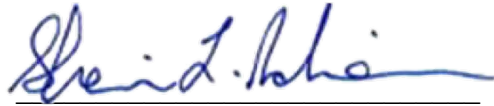
Attorney for Respondent

CERTIFICATE OF SERVICE

I, Sherri L. Robinson, do hereby certify that a copy of the foregoing pleading has been served on each Claimant herein by sending a copy via email and U.S. Mail on this 14th day of May, 2025, to:

Sean Lynn
418 Sierra Madre Dr.
North Little Rock, AR 72118

Laura Hammett
16 Gold Lake Club Rd.
Conway, AR 72032



Sherri L. Robinson