

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SEAN LYNN AND  
LAURA HAMMETT

CLAIMANTS

V.

NO. 250191

UNIVERSITY OF ARKANSAS  
FOR MEDICAL SCIENCES

RESPONDENT

THIRD SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS PROPOUNDED BY CLAIMANTS

Comes now the claimants, Sean Lynn and Laura Hammett (hereinafter referred to as “Lynn” or “Sean” and “Hammett” or “Laura”, respectively), appearing pro se, and hereby propound their THIRD Set of Interrogatories and Requests for Production of Documents to Respondent pursuant to Arkansas Rules of Civil Procedure 33 and 34, as follows:

I. INSTRUCTIONS and DEFINITIONS

1. These discovery requests are continuing in nature and require the serving of supplemental answers and responses without the need for further request, should additional or inconsistent information become available. This obligation continues until the entry of final judgment in this matter.

2. If you consider privileged any communication or information requested herein, please state in your response(s) both the legal and factual bases for such privilege claimed. Any objection raised shall apply only to the specific communication or information allegedly privileged, and will not excuse you from answering the remainder of the interrogatory or request for production of documents to any extent possible.

3. If your refusal to answer any interrogatory or request for production of documents is based upon grounds of undue burden or hardship, please identify in your response a good-faith estimate of the number and nature of documents that need to be searched to comply with the request, the location of such documents, and a good-faith estimate of the number of man-hours or costs associated with such a search.

4. Requests relating to information not in your possession, custody, or control shall be answered by stating completely and precisely the identity of the custodian of such information and the nature of the information itself. If any information called for in these interrogatories or requests for production was previously in existence but no longer exists for whatever reason, explain in your response completely and precisely the information or documentation no longer in existence, and the reason(s) therefor.

5. "UAMS," "You," and "Your" each mean the University of Arkansas for Medical Sciences, including any current or former agents, employees, administrators, professors, residents, students, contractors, and other individuals or entities acting on its behalf or within the scope of their duties at any relevant time, whose conduct may be attributed to UAMS under any theory of agency, employment, or respondeat superior, including but not limited to those who provided, authorized, or administered procedures or medications to Lynn; who made decisions regarding or communicated about Lynn's treatment, care, consent, capacity, or discharge; or who participated in or had knowledge of events giving rise to the claims in this case.

6. "Document" means any written, printed, typed, or other graphic matter of any kind or nature; electronic, mechanical, or electronic/digital recording; photograph, motion picture, digital video, transparency, still picture, videotape, drawing, sketch, negative, or other material in a tangible form and shall include all marginal notations and highlighting placed on the document, and all facsimile transmission lines, and copies of all documents by whatever means made.

7. The term "communication(s)" means any and all manners of transmitting or receiving information, including orally, electronically, digitally, physically, or via document.

8. “Medical Provider” means a medical doctor, physical therapist, occupational therapist, psychiatrist, psychologist, chiropractor, spiritual healer, social worker, counselor, APRN/NP, PA or any other practitioner of the healing arts.
9. “And” shall mean the conjunctive, unless the use would cause an absurd result.
10. “Or” shall mean the disjunctive where the items are mutually exclusive (such as “was he alive or dead?”) otherwise meaning either conjunctive or disjunctive, (such as “did either Lynn or Hammett consent to the procedure?”)
11. “Person” means an individual, corporation, partnership or other entity.
12. The plural shall include the singular and the singular shall include the plural.
13. “Identify” when used in connection with the term “correspondence” or “communication” means to state the identity of the persons involved, the date, the location of the correspondence or communication, whether the correspondence or communication was oral, written, or in another form, and the substance of the correspondence or communication.
14. “Identify” when used in connection with the term “documents” means to state the name, address and telephone number of the author, the date, the identity of each addressee of the documents and each person to whom it was provided, and the general nature of the document. If the document has been lost or destroyed, you should describe with particularity the circumstances relating to the loss or destruction of the document, the approximate date of the loss or destruction, all

persons who have knowledge concerning the loss or destruction, and provide a detailed statement of the contents of the document.

15. “Identify” when used in connection with the term “person” or “entity” means to state, to the extent possible, the person’s name, home address and phone number, place of employment, business address and phone number, occupation, and title.

16. “Med. Rec. 4/29/25” refers to the medical record produced by UAMS through counsel.

17. “Med. Rec. 3/29/24” refers to the medical record produced by UAMS through contractor CIOX on that date.

18. “Med. Rec. 2/13/24” refers to the medical record produced by UAMS through contractor CIOX on that date.

19. “Elope” means to run away, or escape privately, from the place or station to which one is bound by duty.

20. “Escape” means “to get away”, “to issue from confinement”, and “to avoid a threatening evil”. (all from Merriam-Webster.com) “to get free from something such as a prison or cage, or from someone who will not allow you to leave:” (dictionary.cambridge.org)

21. For purposes of these interrogatories, “*Chemical Restraint*” means a drug or medication used to control behavior or restrict the freedom of movement of a patient and not required to treat the patient’s medical or psychiatric condition.

A chemical restraint **does not include** medication that is:

- a) Standard treatment for a patient's diagnosed condition; and
- b) Prescribed at standard dosages, with the goal of managing symptoms rather than limiting autonomy or enforcing compliance; and
- c) To which the patient gave informed consent to use.

This definition includes, but is not limited to, the administration of antipsychotics, sedatives, or other psychoactive drugs for purposes of control, discipline, staff convenience, or retaliation — particularly where:

- a) No informed consent was given,
- b) The patient was competent and objected, or
- c) The drug was administered to subdue rather than treat a condition.

This definition also includes circumstances where no effort was made to notify or consult next of kin, despite the patient being deemed incapable of informed consent.

22. Unless otherwise specified, all interrogatories pertain to the time period Lynn was hospitalized at UAMS Medical Center, from January 13, 2024 at about 5:36 p.m. until January 27, 2024 at about 1:48 p.m.

23. "Capacity" means the ability to make a decision or take an action that impacts a person's life.

## II. INTERROGATORIES

### INTERROGATORY NO. 59:

Did Joseph P. DeLoach sincerely worry that Sean Lynn would “have continued agitation” after leaving UAMS on January 27, 2024? (See Med. Rec. 4/29/25 at page 105.)

### INTERROGATORY NO. 60:

If the answer to INTERROGATORY NO. 1 is affirmative, why did the prescription issued at discharge not include any of the benzodiazepines that were administered to Mr. Lynn to purportedly relieve agitation between January 13 and 27, 2024?

### INTERROGATORY NO. 61

Was Mr. Lynn a danger to others at any time between January 13 and 17, 2024?

### INTERROGATORY NO. 62

If the answer to Interrogatory 61 is affirmative, was any video documentation of dangerous conduct recorded by UAMS?

### INTERROGATORY NO. 63

If the answer to Interrogatory No. 62 is negative, why was no video documentation made that could be used as evidence of the purported necessity to restrain Mr. Lynn?

INTERROGATORY NO. 64

What was Lynn wearing when he escaped to the lobby on the morning of January 21, 2024. Shannon Cobb, RN was a witness?

INTERROGATORY NO. 65

What was Lynn wearing when Nurse Susan (in the we don't give benzos to TBI video) witnessed him go down stairs?

INTERROGATORY NO. 66

Which stairs did Nurse Susan witness Lynn go down?

INTERROGATORY NO. 67

What is the distance from the room Lynn was assigned to on January 15, 2024 at 9:52 a.m. to the window near the east nursing station on H4?

INTERROGATORY NO. 68



Referring to the first note on Med. Rec. 4/29/25 at page 487, was the attempt to “hit staff” reported to UAMS police department?

INTERROGATORY NO. 69

If the answer to Interrogatory No. 68 is negative, why was no report made.

INTERROGATORY NO. 70

If the answer to Interrogatory No. 68 is positive, how can claimants access a copy of the report? (UAMS PD Corporal Clifton Moore specifically told Hammett that the police had no reports concerning Lynn’s hospitalization.)

INTERROGATORY NO. 71

What dates and times was a toxicology test run on Lynn?

INTERROGATORY NO. 72

According to UAMS denial of Request for Admission (RFA) No. 1, “Consent is not required in Emergency Situations.” What was the Emergency Situation that UAMS claims to override the 14<sup>th</sup> amendment right to medical autonomy and the stated policy of UAMS that patients have a “right to refuse treatment”?

INTERROGATORY NO. 73

On what statute, common law decision or other binding authority does UAMS base its contention that “Consent is not required in Emergency Situations”?

INTERROGATORY NO. 74

According to UAMS denial of RFA No. 1, “the person who was with Lynn in the emergency room gave consent for his admission and treatment at UAMS.” Who was the person referred to by “who was with Lynn in the emergency room”?

INTERROGATORY NO. 75

Upon what authority did UAMS base its decision to override Lynn’s autonomy by deferring to the surrogate decision making of “the person who was with Lynn in the emergency room”?

INTERROGATORY NO. 76

Did Laura Hammett give informed consent for Sean Lynn to be treated at UAMS at any time?

INTERROGATORY NO. 77

If UAMS answers Interrogatory No. 77 that Laura Hammett gave informed consent for Sean Lynn to be treated at UAMS, state the details including date, time, what information was provided to Hammett, what treatment was proposed and how the consent was conveyed, naming each document signed.

#### INTERROGATORY NO. 78

In its denial of RFA No. 2, UAMS stated “Hammett was not the patient or surrogate decisionmaker at the time of Lynn’s admission to UAMS; thus, her consent was not required.” By what authority did UAMS deny Lynn’s right to include any family member from participating in his decision to leave UAMS Against Unsolicited Advice (“AUA”)?

#### INTERROGATORY NO. 79

For its denial of RFA No. 3, UAMS stated, “UAMS is without sufficient information, even after reasonable inquiry into the records readily available to it, to admit or deny [Lisette Reyes was never married to Sean Lynn.]” Does UAMS have any legal record that Lisette Reyes was ever married to Sean Lynn?

#### INTERROGATORY NO. 80

State with specificity all reasons why UAMS obtained a surrogate consent form signed by an individual described in the medical record as the patient's "significant other" rather than the patient's mother, given that the mother was physically present, known to staff, and equally available to provide surrogate consent at the time. Include the names and roles of all UAMS personnel involved in that decision and identify any policies, procedures, or guidelines relied upon.

#### INTERROGATORY NO. 81

Identify and describe with specificity all objective criteria, policies, procedures, training, or protocols UAMS used in determining that Hammett did not have sufficient capacity to act as a surrogate decision-maker for Lynn. If any such determination was made, explain whether Hammett's cognitive or intellectual capacity was evaluated or considered, and identify who made the determination. Include whether UAMS considered any standardized intelligence testing or academic aptitude indicators in that decision, and if not, explain why not.

#### INTERROGATORY NO. 82

Explain how Dr. Benjamin L. Davis's written statement on January 27, 2024, at 6:08 p.m., indicating that the determination of Hammett's decision-making capacity was outside the scope of "psych's" expertise because she was not a

patient, is consistent or inconsistent with any prior assessments or assumptions made by UAMS personnel regarding Hammett's capacity to act as a surrogate between January 14 and January 26, 2024. Identify all UAMS staff who made or relied upon such assessments and the bases for their conclusions.

#### INTERROGATORY NO. 83

UAMS wrote in its Response to Claimants' First Set of Requests for Admission:

REQUEST NUMBER 6: Admit that there was no evidence of ossicular disruption or otic capsule involvement in Sean Lynn's left ear noted in a medical record generated by UAMS prior to January 28, 2024.

ANSWER: Admitted that the medical record generated April 29, 2025 states "No evidence of ossicular disruption or otic capsule involvement;" denied that it mentions the left ear.

Specifically to the left ear, list all evidence of ossicular disruption or otic capsule involvement in Sean Lynn's left ear found in all medical records pertaining to Sean Lynn made by UAMS prior to January 28, 2024.

#### INTERROGATORY NO. 84

UAMS wrote in its Response to Claimants' First Set of Requests for Admission:

REQUEST NUMBER 10: Admit that Sean Lynn had the right to be informed of continuing health care requirements following discharge from the hospital.

ANSWER: Admitted. The discharging physician also advised Lynn, both in person and in writing, during the discharge against medical advice to go to another hospital for continued treatment as the physician did not believe that Lynn was medically stable for discharge.

UAMS admitted:

REQUEST NUMBER 9: Admit that Mr. Lynn was discharged with a prescription for only propranolol and sodium tablets sent to a pharmacy.

And

REQUEST NUMBER 8: Admit that the "Discharge of Patient from Hospital Against Medical Advice" form (shown on Med. Rec. 4/29/25 at page 1301 and repeated on page 1303) has a handwritten note that says, "I have requested prescriptions for the 3 medications that

stabilized Sean. I agree to follow the protocol Sean Lynn is on until receiving medical advice.”

Is it true that the only medications UAMS opined were necessary to stabilize Sean Lynn at the time of discharge “Against Medical Advice” were propranolol and sodium tablets?

INTERROGATORY NO. 85

Is it true that UAMS opined that at the time of discharge Sean Lynn did not need a prescription for any of the following list of medications, even on an as needed basis?

Ciprofloxacin-Dexamethasone

Dexmedetomidine

Diazepam

Divalproex

Enoxaparin

Fentanyl

Guanfacine

Haloperidol Lactate

Levetiracetam

Magnesium Sulfate

Olanzapine

Ondansetron

Phenobarbital

Polyethylene Glycol

Propranolol

Quetiapine

Senna

Trazodone

#### INTERROGATORY NO. 86

Did any UAMS Resident report any information of possible wrongdoings, errors, or violations of the law through the appropriate reporting mechanism concerning the conduct toward Sean Lynn from January 13 to 27, 2024? If so, please list each Resident's name, conduct questioned and how the conduct was reported.

#### INTERROGATORY NO. 87

Was there any sentinel event(s) that occurred during Sean Lynn's hospitalization from January 13 to 27, 2024? If so, please identify each, its cause and UAMS' response.



#### INTERROGATORY NO. 88

If not included in the response to Interrogatory No. 87, does UAMS consider the disruption of Sean Lynn's left ear ossicular chain to be a sentinel event?

#### REQUEST FOR PRODUCTION OF DOCUMENTS

##### REQUEST NO. 37

Produce copies of any and all documentation of dangerous to others conduct alleged in response to Interrogatories 61 and 62.

##### REQUEST NO. 38

Produce each document that communicated informed consent by Laura Hammett referred to in UAMS' response to Interrogatory No. 77.

##### REQUEST NO. 39

Produce every document UAMS found that indicates Sean Lynn was ever married to Lisette Reyes.

##### REQUEST NO. 40

Produce a copy of the professional liability insurance issued for coverage of Residents for the period of January 13, 2024 through January 27, 2024 pursuant to

the Resident/Fellow Agreement of Appointment, Ntracts 9834 entered into between the Board of Trustees of the University of Arkansas acting for and on behalf of the University of Arkansas for Medical Sciences ("UAMS") and the trainees who ordered or administered drugs to, ordered or performed procedures on, or ordered or applied physical restraints on Sean Lynn during that period.

Produce every document created pursuant to a report made regarding possible wrongdoings, errors, or violations of the law listed in response to Interrogatory No. 86.

Claimants specifically reserve the right to propound additional interrogatories and discovery requests following further discovery.

Respectfully submitted,

/s/ Sean Lynn (manually signed original available)

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Dated: July 23, 2025

/s/ Laura Hammett (manually signed original available)

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Dated: July 23, 2025

## CERTIFICATE OF SERVICE

I, Laura Hammett, do hereby certify that a copy of the foregoing Claimants' Third Set of Interrogatories and Requests for Production of Documents has been served on the respondent herein by sending a copy via email on this 22nd day of May, 2025, to:

Sherri L. Robinson  
Senior Associate General Counsel  
University Of Arkansas for Medical Sciences  
SLRobinson@uams.edu

Further, a copy was emailed to the Claims Commission in compliance with Rule 8.1.

/s/ Laura Hammett (manually signed original available)

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