

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SEAN LYNN AND  
LAURA HAMMETT

CLAIMANTS

V.

NO. 250191

UNIVERSITY OF ARKANSAS  
FOR MEDICAL SCIENCES

RESPONDENT

FIRST 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 First 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.

## II. INTERROGATORIES

INTERROGATORY NO. 1: Please identify all individuals who you believe have any information regarding the denials you made in your answer. Include in your response the following information:

- a. Name;
- b. Address;
- c. Telephone number;
- d. Whether the individual is a lay witness or expert witness; and
- e. A general summary of what information the witness may have.

INTERROGATORY NO. 2: Please identify all illnesses, conditions and injuries that Sean Lynn was diagnosed with by a medical provider at UAMS before Lynn was first restrained physically or chemically by UAMS. Identify the medical provider who diagnosed him with each illness, condition or injury, the date and time of the diagnosis.

INTERROGATORY NO. 3: Identify each person who restrained Lynn from leaving the hospital by physically tackling him, using hand restraints, using foot restraints, using a harness, forcing Lynn to ingest or be injected with chemical restraints, threatening to or requesting assistance from security or UAMS PD, or

any combination of these tactics? What were the time periods each person took part in the restraint?

INTERROGATORY NO. 4: Identify each UAMS employee who told Hammett that UAMS does not administer benzodiazepines to TBIs.

INTERROGATORY NO. 5: Identify each person who told Hammett that UAMS does not administer opioids to TBIs?

INTERROGATORY NO. 6: For each food or drink presented by UAMS to Lynn for consumption, list when the food or drink was presented, how Lynn was supposed to eat or drink (whether his hands were restrained), and an ingredient list for the food and drinks.

INTERROGATORY NO. 7: Referring to Med. Rec. 4/29/25 at 1292 and 2: There was a consent form and privacy notice signed by Lynn's former girlfriend, Lisette Reyes, on January 14, 2024 at 4:09 p.m. and 4:10 p.m. respectively. Identify all documents showing consent given by Sean Lynn or Laura Hammett, Lynn's next-of-kin who was at Lynn's bedside from approximately for Lynn's hospitalization at



UAMS Medical Center, allowing invasive procedures or agreeing to the use of controlled substances.

INTERROGATORY NO. 8: Were there surveillance cameras in any room in which Lynn was kept, the hallways on the floor where Lynn was kept, the stairwell Lynn went down during an attempt to leave, the elevator area where Lynn was chased to by UAMS staff? If so, list each camera as UAMS identifies it and the location of the camera.

INTERROGATORY NO. 9: Identify each person who accessed fentanyl from any medication dispensing system (including Pyxis or equivalent) by cabinet override at any time during Claimant's admission. For each such instance, state:

- a. The name and job title of the person who performed the override;
- b. The date, time, and location of the override;
- c. The quantity of medication accessed;
- d. Whether the medication was administered to the Claimant, to another patient, or not administered at all;
- e. Whether the medication was properly documented as administered or wasted; and

f. The reason the cabinet override was performed rather than following standard medication dispensing procedures.

b.

INTERROGATORY NO. 10: Identify each person who accessed haloperidol from any medication dispensing system (including Pyxis or equivalent) by cabinet override at any time during Claimant's admission. For each such instance, state:

- a. The name and job title of the person who performed the override;
- b. The date, time, and location of the override;
- c. The quantity of medication accessed;
- d. Whether the medication was administered to the Claimant, to another patient, or not administered at all;
- e. Whether the medication was properly documented as administered or wasted; and
- f. The reason the cabinet override was performed rather than following standard medication dispensing procedures.

INTERROGATORY NO. 11: Explain why the Billing Detail by Date generated on 02/21/24 reflects the following charge: "01/13/24 0636 J3010 Fentanyl per 0.1 mg (0409-9094-12) 1 11.35"

when the medical record dated 04/29/25 contains the following entries reflecting no documented administration:

- Page 69 – Initial entry showing 0 mcg administered and marked "stopped".
- Page 84 – Additional entries on the same date, again ending in "stopped".
- Page 500 – Order by Dr. Natalie Applebaum showing 50 mcg ordered, 0 mcg remaining/total, and marked "completed (past end date/time)".
- Page 547 – Cabinet override entry marked "Active" with no documentation of administration.
- Page 548 – Duplicate of the Page 500 entry showing 50 mcg (0/1) and marked "completed (past end date/time)". Specifically, identify who authorized the charge, who documented the administration (if anyone), and produce any supporting records showing that fentanyl was actually administered or properly wasted in accordance with hospital protocol.

INTERROGATORY NO. 12: Might a reasonable person conclude that the use of four-point restraints posed a significant risk to Patient Lynn, given that the heavy breathing associated with physical struggle increases thoracic pressure, which can in turn elevate intracranial pressure (ICP), potentially exacerbating a cerebrospinal fluid (CSF) leak by placing additional strain on the surrounding membranes?

INTERROGATORY NO. 13: Do Lynn’s dry, chapped lips as shown in photographs on Med. Rec. 4/29/25 at 1295 and 1297 indicate dehydration?

INTERROGATORY NO. 14: Did Lynn have dry, chapped lips upon arrival at UAMS? If so, please identify any documentation reflecting this observation.

INTERROGATORY NO. 15: Based on Lynn’s initial condition at UAMS — including a GCS score of 14, a Wong-Baker FACES Pain Rating of “Hurts a little bit,” and other vitals documented on Med. Rec. 4/29/25 at pages 77 and 78 — was his presentation more consistent with a fall from a 10-foot-high ladder rung or a 30-foot-high rung?

INTERROGATORY NO. 16: Why did UAMS refuse to amend its medical record to reflect that the fall was from the 10-foot-high rung of the ladder, as requested in Lynn’s Request for Amendment of Health Information dated 4/26/2024 (see additional sheet, page 2)?

INTERROGATORY NO. 17: According to the NCBI/NIH study “Falls from Height: A Retrospective Analysis” (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5717375/>), survivors had a mean

GCS score of  $14.40 \pm 1.55$ , while the mean for non-survivors was  $6.00 \pm 2.73$ . In light of Lynn's GCS never falling below 13 and most often recorded as 14, could a reasonable person conclude that he had a high likelihood of survival?

INTERROGATORY NO. 18: Identify all legal authority, hospital policy, or medical documentation that UAMS relied upon to justify detaining the Claimant on or after January 13, 2024, including but not limited to:

- a. Any psychiatric hold or commitment documentation;
  - b. Any documentation used to determine that the Claimant lacked capacity or decision-making ability, including how that determination was made and by whom;
  - c. Any court order, guardianship determination, or other legal authorization;
  - d. Any identified medical condition that allegedly posed an immediate risk of serious harm if the Claimant were to leave the hospital;
- and identify the person(s) who made each such determination.

INTERROGATORY NO. 19: Why did UAMS refuse to recognize Hammett as a surrogate decision-maker for Lynn prior to January 27, 2024?

INTERROGATORY NO. 20: On Med. Rec. 4/29/25, there are notations in the format "XY.NZ," where XY appears to be the initials of the documenting provider, N is a numeral, and Z is a code (Claimants have identified "T," "M," and "C,"

though others may exist). Please identify the meaning of each numeral (N) and code (Z).

INTERROGATORY NO. 21: Does UAMS contend that it is legally permissible to detain a patient against their will solely on the basis of “agitation”?

INTERROGATORY NO. 22: For each modification, alteration, addition, or other change made to any entry on Med. Rec. 4/29/25, identify:

- a. The person who made the change;
- b. Whether the change was a modification, deletion, or addition;
- c. What the original entry stated (if altered), or whether the change was a new addition;

and provide supporting documentation of each change, pursuant to Request for Production No. 3.

INTERROGATORY NO. 23: Identify each instance in which UAMS referred to Sean Lynn’s attempts to leave the facility between January 13, 2024, and January 21, 2024, using the term “elope” rather than “escape”. For each such instance, provide the following:

- a. The date and time of the attempted departure;
- b. The specific language used in any documentation, including nursing notes, physician reports, security records, or internal communications;
- c. The name and role of each person who authored, edited, or approved that documentation;
- d. Whether Mr. Lynn was physically restrained, verbally threatened, or otherwise prevented from leaving during that event;
- e. Whether Mr. Lynn expressed a desire to leave and was denied the right to do so;
- f. Whether any UAMS personnel contacted a legal representative, guardian, or family member before or after the event;
- g. The justification UAMS claims for categorizing the incident as an “elopement” rather than an “escape.”

INTERROGATORY NO. 24: Did Lynn attack a healthcare worker during his confinement? If so, when, provide a description and list the documentation that supports an affirmative answer such as a police report or surveillance video.

INTERROGATORY NO. 25: Did Lynn threaten to harm a healthcare worker during his confinement? If so, when, provide a description and list the documentation that supports an affirmative answer.

INTERROGATORY NO. 26: Other than while attempting to stop a procedure or leave the hospital, did Lynn harm himself? If so, when, provide a description and list the documentation that supports an affirmative answer.

INTERROGATORY NO. 27: Did Lynn express a desire to die? If so, when, provide a detailed description including identification of the person whom Lynn allegedly communicated his intent and list the documentation that supports an affirmative answer.

INTERROGATORY NO. 28: Did Lynn express a desire to harm himself? If so, when, provide a detailed description including Lynn's stated plan, identification of the person whom Lynn allegedly communicated his intent and list the documentation that supports an affirmative answer.

INTERROGATORY NO. 29: Did UAMS restrain Lynn by strapping him to a bed so as to interfere substantially with Lynn's liberty? If so, identify each person who



applied the restraints, identify each person who ordered the use of restraints, and list each time the restraints were applied and removed by UAMS.

INTERROGATORY NO. 30: List each time Lynn removed physical restraints without the help of UAMS.

INTERROGATORY NO. 31: List each time Lynn refused to take a chemical restraint orally and describe how the chemical was introduced into Lynn's body, identifying who ordered the use of the chemical restraint and who administered the chemical restraint.

INTERROGATORY NO. 32: Did UAMS restrain Lynn by having several persons tackle him so as to interfere substantially with Lynn's liberty? If yes, identify each person who had bodily contact with Lynn in an effort to contain Lynn on a hospital bed, the date and time.

INTERROGATORY NO. 33: During the hospitalization, was Lynn "Incompetent", meaning unable to care for himself because of physical or mental disease or defect?

INTERROGATORY NO. 34: Assuming Hammett's birthdate is in 1962, was Hammett over 60 years of age during the hospitalization?

INTERROGATORY NO. 35: Did UAMS' insistence that Lynn remain hospitalized expose him to a substantial risk of serious physical injury? For example:

- a. Could Lynn have sustained serious injury while running down the stairs with UAMS employees in pursuit?
- b. Could Lynn have sustained serious injury while struggling against one or more UAMS employees as they attempted to strap him to a bed?
- c. Could UAMS Police Department have mistakenly perceived Lynn as a threat as he fled the hospital and shot him, potentially fatally?
- d. Could UAMS' decision to catheterize Lynn, instead of addressing his stated need to urinate and desire to leave, have resulted in Lynn pulling out the catheter in an attempt to escape, thereby causing injury?
- e. Could the trauma inherent in being treated like a prisoner have delayed the healing process from his brain injury or caused permanent psychological or neurological damage?
- f. Could forcing Lynn—a person with a history of substance abuse—to take benzodiazepines, barbiturates, or fentanyl have triggered a relapse into drug or alcohol use, which the court may take judicial notice is physically harmful?

INTERROGATORY NO. 36: Had Hammett not continued efforts to negotiate Lynn's release and instead participated in his escape (e.g., by throwing blocks or driving the escape vehicle), would Hammett have faced a substantial risk of serious physical harm? For example:

- a. Being shot by a UAMS police officer;
- b. Falling down the hospital stairs; or
- c. Being shoved into an elevator wall during a struggle.

INTERROGATORY NO. 37: Would Hammett, as caretaker of Lynn's 8-year-old daughter, C.L., have been able to spend more time with Lynn if UAMS had allowed her to bring C.L. into the hospital room where Lynn was confined?

INTERROGATORY NO. 38: Is it reasonable to believe that Lynn would have experienced substantial therapeutic benefit from the company of his daughter during the two weeks following his traumatic brain injury?

INTERROGATORY NO. 39: Please watch the following videos of Lynn taken shortly after his release from UAMS Against Medical Advice (AMA), located on YouTube at the channel @StopBigBusinessBillionaires:

- [https://www.youtube.com/shorts/x7Tg\\_RfYA2k](https://www.youtube.com/shorts/x7Tg_RfYA2k)
- <https://www.youtube.com/shorts/E6Ss-1CYlx0>
- <https://www.youtube.com/watch?v=y3T7iZP-CdI>

These and other videos will be included in our production of documents. However, for immediate access, please view them via the links above. Based on your review, does Lynn appear agitated in these videos?

INTERROGATORY NO. 40: Identify all video footage of Lynn being wheeled from the ICU floor to the front of the hospital building on January 27, 2024? Does the video depict Lynn in an agitated state or does he appear calm?

INTERROGATORY NO. 41: On January 29, 2024, at approximately 10:00 a.m., UAMS placed a call to Lynn at (213) 716-5231. Lynn authorized Hammett to speak for him as an ADA accommodation for hearing loss and aphasia. Hammett began recording the call at 10:03 a.m., after being transferred. The video of the call is posted on Hammett's YouTube at <https://www.youtube.com/watch?v=4ggx0nLuNMk> and will be included in the first production of documents as file "20240129\_1003 UAMS initiated call to Lynn Hammett transferred left message lawsuit.mp4".

A) Identify the person who received the voicemail.

- B) Was this a clearly stated threat of litigation requiring a litigation hold on UAMS generated videos?
- C) Identify all documentation of the message Hammett left.

INTERROGATORY NO. 42: Please identify and describe in detail any and all facts known to you regarding the administration of Ciprofloxacin-Dexamethasone 0.3%-0.1% (eye/ear drops) to Lynn during their admission from January 13, 2024 to January 27, 2024, including:

- a. The total number of doses ordered, the frequency (e.g., BID), and the duration of the prescribed regimen;
- b. The total number of doses actually administered to the patient, including the date and time of each administration;
- c. An explanation for any missed, delayed, or undocumented doses, including whether such omissions were due to staff error, medication unavailability, patient refusal, or any other reason;
- d. identify each person involved in the ordering, administration, or oversight of this medication during the relevant time period;
- e. An explanation of why there is a discrepancy between the administration logs on pages 482–483 of Med. Rec. 4/29/25 (which document 18 administrations) and the daily record (which reflects only five administrations);

- f. Whether any adverse outcomes, complications, or deviations in recovery were noted by clinical staff in connection with missed or omitted doses of this medication; and
- g. A copy of all internal communications, incident reports, or quality assurance reviews conducted in response to this discrepancy, if any.

### III. REQUESTS FOR PRODUCTION OF DOCUMENTS

#### REQUEST FOR PRODUCTION NO. 1:

Produce copies of all documents, records, communications, correspondence, or recordings—whether or not specifically requested herein—that were used, identified, or relied upon to answer, support, or substantiate your responses to these interrogatories, or that support your denials in your answer or any future defenses.

#### REQUEST FOR PRODUCTION NO. 2:

For each expert you intend to call as a witness, produce copies of the following:

- (a) the expert's current curriculum vitae;
- (b) any written report prepared by the expert containing their opinions and conclusions regarding the matters on which they may testify at hearing; and

(c) any underlying data, resource materials, written documents, computer programs, or other materials produced or utilized by the expert in forming their opinions, preparing their written report, or preparing for their testimony.

**REQUEST FOR PRODUCTION NO. 3:**

Produce any audit trail, revision history, or similar document for the Medical Record generated 4/29/25, showing all modifications, changes, updates, or other alterations to original entries, and identify what the original, contemporaneous entries stated.

**REQUEST FOR PRODUCTION NO. 4:**

Produce all incident reports, security reports, staff statements, or other documentation identifying each person involved in physically restraining Lynn or participating in efforts to prevent him from leaving the hospital, as referenced in Interrogatory No. 3.

**REQUEST FOR PRODUCTION NO. 5:**

Produce any policies, guidelines, protocols, or written materials regarding the administration or avoidance of benzodiazepines and opioids in the

treatment of patients with traumatic brain injuries (TBI), as referenced in Interrogatories No. 4, 5, 9, 11, and 35(f).

**REQUEST FOR PRODUCTION NO. 6:**

Produce all dietary records, menus, ingredient lists, and nutritional information for food or beverages presented by UAMS to Lynn for consumption, as referenced in Interrogatory No. 6.

**REQUEST FOR PRODUCTION NO. 7:**

Produce copies of any and all documents showing consent given by Sean Lynn or Laura Hammett for Lynn's hospitalization at UAMS Medical Center, allowing invasive procedures or agreeing to the use of controlled substances as referenced in Interrogatory No. 7.

**REQUEST FOR PRODUCTION NO. 8:**

Produce a map or description identifying the locations of all surveillance cameras in the rooms, hallways, stairwells, and elevator areas where Lynn was housed or pursued, as referenced in Interrogatories No. 8, 24, and 40, along with any video footage captured by those cameras.



REQUEST FOR PRODUCTION NO. 9:

Produce all system logs, access records, and audit trails showing cabinet overrides or other medication dispensing activity for fentanyl and haloperidol during Lynn's admission, as referenced in Interrogatories No. 9, 10, and 11.

REQUEST FOR PRODUCTION NO. 10:

Produce all billing records, audit trails, and supporting documentation related to the fentanyl charge listed in the Billing Detail by Date report generated on February 21, 2024, as referenced in Interrogatory No. 11.

REQUEST FOR PRODUCTION NO. 11:

Produce any internal risk assessments, staff discussions, or policy documents addressing the risks of using physical or chemical restraints on patients with suspected or confirmed brain injuries, including any references to increased intracranial pressure, as referenced in Interrogatory No. 12.

REQUEST FOR PRODUCTION NO. 12:

Produce all photographs, medical notes, and assessments documenting Lynn's hydration status, including any references to dry or chapped lips, as referenced in Interrogatories No. 13 and 14.

REQUEST FOR PRODUCTION NO. 13:

Produce all records reflecting Lynn's vital signs, pain scale ratings, and Glasgow Coma Scale (GCS) score upon admission, as referenced in Interrogatories No. 15 and 17.

REQUEST FOR PRODUCTION NO. 14:

Produce all records, communications, or responses related to Lynn's Request for Amendment of Health Information dated April 26, 2024, as referenced in Interrogatories No. 14 and 16.

REQUEST FOR PRODUCTION NO. 15:

Produce any risk assessments, clinical studies, or staff discussions evaluating Lynn's likelihood of survival based on his reported GCS score of 14, as referenced in Interrogatories No. 15 and 17.

REQUEST FOR PRODUCTION NO. 16:

Produce all policies, procedures, or legal documents relied upon to justify Lynn's continued detention in the hospital, as referenced in Interrogatory No. 18.

REQUEST FOR PRODUCTION NO. 17:

Produce all communications or documentation regarding the refusal to recognize Hammett as Lynn's surrogate prior to January 27, 2024, as referenced in Interrogatory No. 19.

REQUEST FOR PRODUCTION NO. 18:

Produce any legend, key, or explanatory document identifying the meaning of the notations in the format "XY:NZ" used in Med. Rec. 4/29/25, as referenced in Interrogatory No. 20.

REQUEST FOR PRODUCTION NO. 19:

Produce all policies, legal opinions, or clinical guidelines indicating whether "agitation" is a sufficient justification for detaining a patient against their will, as referenced in Interrogatory No. 21.

REQUEST FOR PRODUCTION NO. 20:

Produce all reports, incident summaries, or medical records documenting any allegations that Lynn attacked a healthcare worker or expressed suicidal ideation, as referenced in Interrogatories No. 24 through 28.

REQUEST FOR PRODUCTION NO. 21:

Produce all records or reports documenting the use of physical or chemical restraints on Lynn, including bed restraints, physical takedowns, and medications administered for behavior control, as referenced in Interrogatories No. 25 through 27.

REQUEST FOR PRODUCTION NO. 22:

Produce any risk assessments, incident reports, or staff communications addressing the risks associated with Lynn's confinement or his attempts to escape, as referenced in Interrogatories No. 30, 31, and 32.

REQUEST FOR PRODUCTION NO. 23:

Produce all policies, legal documents, or risk assessments concerning the rights and abilities of family members to provide care and support to hospitalized patients, as referenced in Interrogatory No. 37.

REQUEST FOR PRODUCTION NO. 24:

Produce all clinical studies, internal communications, or policies addressing the therapeutic value of allowing patients with traumatic brain injuries to have contact with their children, as referenced in Interrogatory No. 38.

REQUEST FOR PRODUCTION NO. 25:

Produce all notes, assessments, or internal communications documenting Lynn's level of agitation and whether discharge or release was considered as a method to reduce that agitation.

Claimants specifically reserve the right to propound additional interrogatories and discovery requests following review of the information and documents produced in response to these requests and responding to the first set of interrogatories and requests for production served by UAMS.

Respectfully submitted,

/s/ Sean Lynn (manually signed original available)

Sean Lynn, Pro Se  
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(213) 716-5231  
SeanLynnP@yahoo.com

Dated: May 22, 2025

/s/ Laura Hammett (manually signed original available)

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Conway, AR 72032  
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Bohemian\_books@yahoo.com

Dated: May 22, 2025

## CERTIFICATE OF SERVICE

I, Laura Hammett, do hereby certify that a copy of the foregoing Claimants' First 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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