

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SEAN LYNN AND
LAURA HAMMETT

CLAIMANTS

V.

NO. 250191

UNIVERSITY OF ARKANSAS
FOR MEDICAL SCIENCES

RESPONDENT

[RENUMBERED] SECOND 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 Second 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. 43: Was the “72-hour hold” imposed on Lynn from January 21, 2024 to January 24, 2024 a psychiatric hold?

INTERROGATORY NO. 44

During the “72-hour hold” imposed on Lynn from January 21, 2024 to January 24, 2024, was Lynn transferred to the Psychiatric Research Institute (PRI)?

INTERROGATORY NO. 45

Does UAMS maintain that a person who is on a psychiatric hold loses his right to refuse physical medical treatment even through a surrogate?

INTERROGATORY NO. 46

Where in any of the UAMS medical records dated January 13, 2024 to January 27, 2024 and already produced to either claimant whether before or after the formal discovery, is Lynn’s Agitated Behavior Scale (ABS) score recorded? Claimants found none and are verifying.

INTERROGATORY NO. 47

Where in any of the UAMS medical records dated January 13, 2024 to January 27, 2024 and already produced to either claimant whether before or after the formal discovery, is Lynn's Galveston Orientation and Amnesia Test (GOAT) score recorded? Claimants found none and are verifying.

INTERROGATORY NO. 48

Where in any of the UAMS medical records dated January 13, 2024 to January 27, 2024 and already produced to either claimant whether before or after the formal discovery, is Lynn's Rancho Los Amigos (RLA) Scale score recorded? Claimants are verifying that they found each RLA score recorded.

INTERROGATORY NO. 49

Is this a full and complete list of each provider and date who recorded an objective agitation score for Lynn using the RLA Scale in any of the UAMS medical records dated January 13, 2024 to January 27, 2024 and already produced to either claimant whether before or after the formal discovery? For each note as it appears on Med. Rec. 4/29/25 (page on list) which was modified, please give the latest date, and time where known, when modified.

1/14/24 Zachary Dawes, M.D. page 164: “Now with moderate TBI and impairments listed above. Currently RLA V. PMR consulted for TBI management.[ZD.3M]”

1/15/24 Emily Gray, CCC-SLP pages 188, 642, 646: “Informally, pt appears to be ~RLA IV.”

1/15/24 Christopher S. Cathcart, PT page 328: “TBI consistent with RLA IV.[CC.1M]”

1/17/24 Christopher S. Cathcart, PT page 333: “TBI consistent with RLA V.[CC.1M]”

INTERROGATORY NO. 50

Where in any of the UAMS medical records dated January 13, 2024 to January 27, 2024 and already produced to either claimant whether before or after the formal discovery, is Lynn’s Overt Agitation Severity Scale score recorded? Claimants found none and are verifying.

INTERROGATORY NO. 51

Where in any of the UAMS medical records dated January 13, 2024 to January 27, 2024 and already produced to either claimant whether before or after the formal

discovery, is Lynn's Neurobehavioral Rating Scale score recorded? Claimants found none and are verifying.

INTERROGATORY NO. 52

During Lynn's hospitalization from January 13, 2024 to January 27, 2024 was he diagnosed with receptive or mixed aphasia? Claimants found none and are verifying.

INTERROGATORY NO. 53

If the answer to INTERROGATORY NO. 10 was positive, list dates of the diagnosis of receptive or mixed aphasia and the method of testing.

INTERROGATORY NO. 54

What is the justification UAMS has for not honoring Lynn's refusal of treatment?

INTERROGATORY NO. 55

Why did UAMS refuse to allow Lynn to leave before January 13 and 27, 2024 when he was released "AMA"?

INTERROGATORY NO. 56

If the answer to No. 13 includes a medical condition, please list each medical condition, its date and time of onset, where in Med. Rec. 4/29/25 it is documented and the mechanism for how it occurred.

INTERROGATORY NO. 57

Why is there a “visit” recorded on 2/21/24 for Lynn at UAMS at Med. Rec. 4/29/24 at pages 19 to 22? Did Lynn make an appointment? Did Lynn keep this appointment? Was Lynn or an insurance on Lynn’s behalf charged for this “visit”?

INTERROGATORY NO. 58

For each redaction on Med. Rec. 4/29/25 list the redacted version followed by the original version.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 26

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 117, using the same software program. “Attestation signed by Bruce, Nolan R, MD at 1/13/2024 10:16 PM Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. Original note redacted by HIM due to inaccurate content. For more

information please contact the UAMS HIM Chart Corrections Team. [SA.1T]

Electronically signed by Arensberg, Landon, MD at 1/13/2024 6:35 PM

Electronically signed by Bruce, Nolan R, MD at 1/13/2024 10:16 PM”

REQUEST NO. 27

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 141, using the same software program. “Version 5 of 6 Author: Karimaghaei,

Sam, MD Filed: 1/13/2024 11:42 PM Editor: Karimaghaei, Sam, MD (Resident)

Service: Ophthalmology Date of Service: 1/13/2024 7:00 PM Author Type:

Resident Status: Addendum Original note redacted by HIM due to inaccurate

content. For more information please contact the UAMS HIM Chart Corrections

Team. [SA.1T] Electronically signed by Karimaghaei, Sam, MD at 1/13/2024

11:42 PM”

REQUEST NO. 28

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 142, using the same software program. “Version 4 of 6 Author: Karimaghaei,

Sam, MD Filed: 1/13/2024 11:40 PM Editor: Karimaghaei, Sam, MD (Resident)

Service: Ophthalmology Date of Service: 1/13/2024 7:00 PM Author Type:

Resident Status: Addendum Original note redacted by HIM due to inaccurate

content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Karimaghaei, Sam, MD at 1/13/2024 11:40 PM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:10 AM”

REQUEST NO. 29

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 142, using the same software program. “Version 4 of 6 Author: Karimaghaei, Sam, MD Filed: 1/13/2024 11:40 PM Editor: Karimaghaei, Sam, MD (Resident) Service: Ophthalmology Date of Service: 1/13/2024 7:00 PM Author Type: Resident Status: Addendum Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Karimaghaei, Sam, MD at 1/13/2024 11:40 PM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:10 AM”

REQUEST NO. 30

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 142, using the same software program. “Version 3 of 6 Author: Karimaghaei, Sam, MD Filed: 1/13/2024 11:39 PM Editor: Karimaghaei, Sam, MD (Resident) Service: Ophthalmology Date of Service: 1/13/2024 7:00 PM Author Type: Resident Status: Addendum Original note redacted by HIM due to inaccurate

content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Karimaghaei, Sam, MD at 1/13/2024 11:39 PM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:10 AM”

REQUEST NO. 31

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 142, using the same software program. “Version 2 of 6 Author: Karimaghaei, Sam, MD Filed: 1/13/2024 10:30 PM Editor: Karimaghaei, Sam, MD (Resident) Service: Ophthalmology Date of Service: 1/13/2024 7:00 PM Author Type: Resident Status: Addendum Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Karimaghaei, Sam, MD at 1/13/2024 10:30 PM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:10 AM”

REQUEST NO. 32

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 143, using the same software program. “Version 1 of 6 Author: Karimaghaei, Sam, MD Filed: 1/13/2024 7:59 PM Editor: Karimaghaei, Sam, MD (Resident) Service: Ophthalmology Date of Service: 1/13/2024 7:00 PM Author Type: Resident Status: Signed Original note redacted by HIM due to inaccurate content.

For more information please contact the UAMS HIM Chart Corrections Team.

[SA.1T] Electronically signed by Karimaghaei, Sam, MD at 1/13/2024 7:59 PM

Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:10 AM”

REQUEST NO. 33

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at

page 153, using the same software program. “Version 1 of 2 Author: Cate,

Elizabeth, RD Filed: 1/14/2024 10:40 AM Service: — Date of Service: 1/14/2024

8:10 AM Editor: Cate, Elizabeth, RD (Registered Dietitian) Author Type:

Registered Dietitian Status: Signed Original note redacted by HIM due to

inaccurate content. For more information please contact the UAMS HIM Chart

Corrections Team. [SA.1T] Electronically signed by Cate, Elizabeth, RD at

1/14/2024 10:40 AM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024

10:20 AM”

REQUEST NO. 34

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at

page 165-166, using the same software program. “Version 2 of 3 Author: Dawes,

Zachary T, DO Filed: 1/15/2024 12:40 PM Editor: Dawes, Zachary T, DO

(Resident) Service: Physical Medicine and Rehabilitation Date of Service:

1/14/2024 10:09 PM Author Type: Resident Status: Signed Cosigner: Means, Kevin M., MD at 1/16/2024 12:44 AM Attestation signed by Means, Kevin M., MD at 1/16/2024 12:44 AM Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Dawes, Zachary T, DO at 1/15/2024 12:40 PM Electronically signed by Means, Kevin M., MD at 1/16/2024 12:44 AM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:28 AM”

REQUEST NO. 35

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 166, using the same software program. “Version 1 of 3 Author: Dawes, Zachary T, DO Filed: 1/15/2024 12:03 PM Editor: Dawes, Zachary T, DO (Resident) Cosigner: — Service: Physical Medicine and Rehabilitation Date of Service: 1/14/2024 10:09 PM Author Type: Resident Status: Cosign Needed Cosign Required: Yes Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Dawes, Zachary T, DO at 1/15/2024 12:03 PM Attribution Key SA.1 - Anand, Sangeetha on 11/14/2024 10:28 AM”

REQUEST NO. 36

Please produce the original, unredacted note referenced` on Med. Rec. 4/29/25 at page 166, using the same software program. “Version 1 of 2 Author: Gray, Emily, CCC-SLP Filed: 1/15/2024 11:42 AM Service: Speech Language Pathology Date of Service: 1/15/2024 11:26 AM Editor: Gray, Emily, CCC-SLP (Speech and Language Pathologist) Pre-procedure Diagnoses 1. Oropharyngeal dysphagia Post-procedure Diagnoses 1. Oropharyngeal dysphagia Procedures 1. SLP CLINICAL SWALLOW EVALUATION - CPT 92610 [SLP7 (Custom)] Author Type: Speech and Language Pathologist Status: Signed Original note redacted by HIM due to inaccurate content. For more information please contact the UAMS HIM Chart Corrections Team. [SA.1T] Electronically signed by Gray, Emily, CCC-SLP at 1/15/2024 11:42 AM Attribution Key SA.1 - Anand, Sangeetha on 11/21/2024 5:15 PM”

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

Respectfully submitted,

/s/ Sean Lynn (manually signed original available)

Sean Lynn, Pro Se
418 Sierra Madre Drive
North Little Rock, AR 72118
(213) 716-5231
SeanLynnP@yahoo.com

Dated: June 12, 2025

/s/ Laura Hammett (manually signed original available)

Laura Hammett, Pro Se
16 Gold Lake Club Rd.
Conway, AR 72032
(760) 966-6000
Bohemian_books@yahoo.com

Dated: June 12, 2025

CERTIFICATE OF SERVICE

I, Laura Hammett, do hereby certify that a copy of the foregoing Claimants'
[RENUMBERED] Second Set of Interrogatories and Requests for Production of
Documents has been served on the respondent herein by sending a copy via email on
this 16th day of June, 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)

Laura Hammett
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