

**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' FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS 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' First Set of Interrogatories and Requests for Production of Documents, states as follows.

**OBJECTIONS**

Respondent objects to the instructions and definitions set forth by Claimants. These discovery requests are being answered only in accordance with Arkansas law and not in accordance with any instructions or definitions of Claimants. Respondent will supplement its responses to Claimants' discovery after obtaining all the records and the pertinent deposition testimony of the fact witnesses and any expert witnesses. All references to the medical record by Respondent herein are to the Legal Medical Record generated on April 29, 2025 and provided to Claimants on May 9, 2025 by email to Claimant Laura Hammett.

**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.

**ANSWER:** UAMS objects to this interrogatory as vague, ambiguous, overbroad, and unduly burdensome. Notwithstanding the objection, UAMS believes that all individuals listed in the medical record may have information relevant to this matter. While most of those individuals are medical professionals and may qualify as experts, their testimony in this matter will be primarily factual. Should UAMS determine that any of the medical professionals listed in the medical record will be an expert witness in this matter, UAMS will supplement this response at the appropriate time. The factual information each individual will rely upon is contained within the medical record unless stated otherwise in these or other discovery responses on behalf of UAMS. All UAMS employees may be contacted through UAMS counsel. In addition to the individuals listed in the medical record, the following individuals may have information and may be contacted through UAMS counsel:

1. Kathy Flores, former Sr. Manager of Patient Relations, may have information regarding complaints raised by Claimants.
2. Lisa Varner, CSM H-4, may have general information regarding Lynn's care and treatment while a patient on H-4. Additionally, Varner has knowledge about policies, procedures and processes applicable to nursing, the types of patients on H-4 and the general care provided to patients on H-4.

3. Terry Jones, Executive Director and Chief Security Officer of the Department of Public Safety, has knowledge about the security cameras used at UAMS, including the locations and how long recordings are preserved.
4. Mark Kolody, Director of Security and Support Services, has knowledge about the security cameras used at UAMS, including the locations and how long recordings are preserved.
5. Kristy Bienvenu, Risk Management Coordinator, may have information regarding complaints raised by Claimants.
6. Robyn Horn, Director of Clinical Risk, Patient Safety and Patient Relations, may have information regarding complaints raised by Claimants as well as the UAMS policies and procedures related to Clinical Risk, Patient Safety and Patient Relations.

**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.

**ANSWER:** UAMS objects to this interrogatory as vague, ambiguous, argumentative, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, the medical record of Lynn's hospitalization at UAMS from January 13-27, 2024 contains all diagnoses made by UAMS medical providers during the entirety of the hospitalization. Claimants have previously been provided multiple copies of the medical record.

**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?

**ANSWER:** UAMS objects to this interrogatory as argumentative and unduly burdensome. Notwithstanding the objection, the medical record of Lynn's hospitalization at UAMS from January 13-27, 2024 contains documentation of use of physical restraints on Lynn to protect him from harming himself. See, e.g., pp. 632-642, 821-841. There are multiple sections of the record labeled "User Key" or "Attribution Key" which identifies the initials throughout the record. UAMS denies that Lynn was tackled, chemically restrained, or threatened by security or UAMS PD.

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

**ANSWER:** UAMS objects to this interrogatory at it seeks information in the possession of or known to Claimants. Notwithstanding the objection, UAMS is without sufficient information to determine every UAMS employee that Hammett had contact with during Lynn's hospitalization January 13-27, 2024 or anytime thereafter.

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

**ANSWER:** UAMS objects to this interrogatory at it seeks information in the possession of or known to Claimants. Notwithstanding the objection, UAMS is without sufficient information to determine every UAMS employee that Hammett had contact with during Lynn's hospitalization January 13-27, 2024 or anytime thereafter.

**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.

**ANSWER:** UAMS does not routinely maintain the information requested and does not have this information for Lynn. Notwithstanding, Lynn was given only a liquid diet and/or a feeding tube until just a few hours before he left the hospital against medical advice.

**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.

**ANSWER:** The signature on the consent in the medical record—Admission/Consent Agreement—is not legible, and the form speaks for itself. Based on other documentation in the medical record, it appears that Lisette Reyes was at the bedside with Lynn in the emergency department. According to the medical record, Lynn did not have any invasive procedures during his admission January 13-27, 2024. Additionally, separate written consent is not required for medication administration, and the medical record indicates that Lynn refused medications several times during his admission.

**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.

**ANSWER:** UAMS maintains security cameras throughout the campus including on the unit where Lynn was a patient; however, security cameras are not used in patient rooms. In certain circumstances an Avasure camera, which is a camera on wheels that is sometimes referred to as a telesitter, may be used to assist in monitoring a patient; however, no such camera was used in Lynn's room.

**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.

**ANSWER:** UAMS objects to this interrogatory as vague, ambiguous, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Whether fentanyl was accessed as described for any patient during Lynn's admission, including Lynn, is irrelevant to Claimants' claims.

**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.

**ANSWER:** UAMS object to this interrogatory as vague, ambiguous, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Whether haloperidol was accessed as described for any patient during Lynn's admission, including Lynn, is irrelevant to Claimants' claims.

**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.

**ANSWER:** UAMS object to this interrogatory as vague, ambiguous, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, on page 84 of the UAMS medical record, it indicates that Dr. Applebaum, an Emergency Department physician, ordered a 50 mcg dose of fentanyl via injection into the IV line for Lynn while he was in the Emergency Department, and Emergency Department nurse Nathan Ernst administered the fentanyl per the order.

**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?

**ANSWER:** UAMS objects to this interrogatory as it calls for pure conjecture and speculation. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS.

**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?



**ANSWER:** UAMS objects to this interrogatory as it calls for pure conjecture and speculation, is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to any of the claims raised by Claimants. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

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

**ANSWER:** UAMS objects to this interrogatory as it calls for pure conjecture and speculation is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to Claimants' claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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?

**ANSWER:** UAMS objects to this interrogatory it calls for pure conjecture and speculation, is not reasonably calculated to leave to the discovery of admissible evidence, and is not relevant to Claimants' claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection,

UAMS notes that in one of Hammett's own recordings on or about January 29, 2024, she states that Lynn fell from a height of 34 feet. UAMS further refers Claimants to the medical record, which speaks for itself.

**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)?

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, UAMS notes that in one of Hammett's own recordings on or about January 29, 2024, she states that Lynn fell from a height of 34 feet.

**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?

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to Claimants' claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

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

**ANSWER:** UAMS did not 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).

**ANSWER:** UAMS objects to Claimants’ Request as it is vague, ambiguous, overbroad, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have not provided specific locations in the medical record for each numeral and code. Notwithstanding the objection, the format listed by Claimants indicates as follows: XY are the initials of the documenting provider and the Attribution Key throughout the medical record identifies who the initials belong to, N is the version of entry by that provider, and Z is the type of entry - Manual, Template, or Copied.

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

**ANSWER:** UAMS objects to Claimants’ Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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

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

**ANSWER:** UAMS objects to this interrogatory as vague, ambiguous, overly broad, unduly burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, Claimants have already been provided a copy of the medical record that was generated on April 29, 2025 which contains all information regarding Lynn's treatment at UAMS January 13-27, 2024. Additionally, UAMS previously provided copies of all versions of notes that were redacted to Claimants by email on July 2, 2025. The Attribution Keya and User Keys listed in the medical record identifies each person responsible for the record entry and the date/time stamp the entry was made.

**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.”

**ANSWER:** UAMS objects to Claimants’ Request as argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** There is no indication in the medical record or in UAMS PD incident reports that Lynn attacked a healthcare worker during his admission to UAMS.

**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.

**ANSWER:** There is no indication in the medical record or in UAMS PD incident reports that Lynn threatened to harm a healthcare worker during his admission to UAMS.

**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.

**ANSWER:** The medical record documents that Lynn was placed on a 72 hour hold once during his January 13-27, 2024 admission to UAMS, and there were multiple orders for physical restraints because of Lynn's actions removing IV lines, foley catheters, and medical equipment and his lack of capacity to understand the impact of his actions that put him at high risk for further injury.

**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.

**ANSWER:** There is no indication in the medical record that Lynn expressed a desire to die.

**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.

**ANSWER:** There is no indication in the medical record that Lynn expressed a desire to harm himself. However, the medical record documents that Lynn was placed on a 72 hour hold once during his January 13-27, 2024 admission to UAMS, and there were multiple orders for physical restraints because of Lynn's actions removing IV lines, foley catheters, and medical equipment and his lack of capacity to understand the impact of his actions that put him at high risk for further injury.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

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

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, UAMS denies that chemical restraints were used on Lynn during his January 13-27, 2024 admission to UAMS.

**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.

**ANSWER:** No.



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

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

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

**ANSWER:** UAMS objects to this interrogatory as argumentative, harassing because of its outlandish nature, assuming facts not in evidence, is not reasonably calculated to lead to the discovery of admissible evidence and not relevant to Claimants' claims. Notwithstanding the objection, conventional math dictates that an individual born in 1962 would be over 60 years old in January 2024.

**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?

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS.

**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?

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS.

**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?

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims

through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS.

**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-1CY1x0>
- <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?

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS.

**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?

**ANSWER:** UAMS does not have security video footage of Lynn during his admission to UAMS from January 13 to 27, 2024. Additionally, UAMS was not put on notice sufficient

to establish that it was required to place a litigation hold on any possible security video footage during Lynn's hospitalization January 13-27, 2024.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is vague, ambiguous, argumentative, overbroad, and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, UAMS is without sufficient information to determine who Hammett allegedly spoke to January 29, 2024 as the person is not identified in the video. As a result, UAMS cannot identify the individual or respond to Claimants' additional requests in this interrogatory.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is vague, ambiguous, argumentative, overbroad, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

## 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.

**ANSWER:** The medical record generated on April 29, 2025 is the primary document utilized to respond to Claimants' discovery requests. That record was previously produced to Claimants.

**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.

**ANSWER:** UAMS believes that all individuals listed in the medical record may have information relevant to this matter. While most of those individuals are medical professionals and may qualify as experts, their testimony in this matter will be primarily factual. Should UAMS determine that any of the medical professionals listed in the medical record will be an expert witness in this matter, UAMS will supplement this response at the appropriate time. The factual information each individual will rely upon is contained within

the medical record unless stated otherwise in these or other discovery responses on behalf of UAMS.

**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.

**ANSWER:** UAMS objects to this interrogatory as vague, ambiguous, overly broad, unduly burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, Claimants were provided a copy of the medical record generated on April 29, 2025 which contains all information regarding Lynn's treatment at UAMS January 13-27, 2024. Additionally, UAMS provided copies of all versions of notes that were redacted to Claimants by email on July 2, 2025.

**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.

**ANSWER:** UAMS objects to this interrogatory as argumentative and unduly burdensome. Notwithstanding the objection, the medical record of Lynn's hospitalization at UAMS from January 13-27, 2024 contains documentation of use of physical restraints on Lynn to protect him from harming himself.

**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).

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to Claimants' claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS.

**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.

**ANSWER:** This information is no longer available.

**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.

**ANSWER:** Copies of consent documents are provided in the medical records which has been previously provided to Claimants.

**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.

**ANSWER:** UAMS produced a document containing the location of the cameras to Claimant Hammett on June 23, 2025 in response to a request under the Arkansas Freedom

of Information Act. Additionally, counsel for UAMS arranged for Claimant Hammett to tour H4 and F4 with the Executive Director of Public Safety on July 1, 2025 to see the locations of the cameras as well. Additionally, see attached .pdf which is best viewed at 200% or higher in order to see details.

**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.

**ANSWER:** UAMS objects to this Request as vague, ambiguous, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Whether fentanyl or haloperidol was accessed as described for any patient during Lynn's admission, including Lynn, is irrelevant to Claimants' claims.

**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.

**ANSWER:** UAMS objects to this Request as vague, ambiguous, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, billing records have already been produced to Claimants. With regard to the audit trail, see response to Request for Production No. 3.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to Claimants' claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** If Lynn had hydration issues, it would be noted in the medical record, which speaks for itself.

**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.

**ANSWER:** Please see the medical record which has been previously produced to Claimants and speaks for itself.

**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.

**ANSWER:** UAMS objects to this request as vague, ambiguous, overly broad, unduly burdensome and harassing, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, see attached documents which

Claimants have already been provided. Additionally, UAMS previously provided copies of all versions of notes that were redacted by email on July 2, 2025.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it calls for pure conjecture and speculation, is not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to Claimants' claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, overbroad, argumentative, is not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to Claimants' claims. Moreover, this Request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS did not refuse to recognize Hammett as Lynn’s surrogate. There is no formal documentation in the medical record appointing a surrogate; however, the medical records indicate that UAMS medical providers recognized Hammett as the surrogate decision maker for Lynn.

**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.

**ANSWER:** UAMS objects to Claimants’ Request as it is vague, ambiguous, overbroad, and is not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the objection, there is no document containing the explanation sought; however, please see Answer to Interrogatory No. 20 for the explanation.

**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.

**ANSWER:** UAMS objects to Claimants’ Request as it calls for pure conjecture and speculation, is not reasonably calculated to lead to the discovery of admissible evidence, and is not relevant to Claimants’ claims. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** N/A.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, overbroad, and argumentative. Notwithstanding the objection, UAMS denies that it used chemical restraints or physical takedowns. Additionally, UAMS refers Claimants to the medical record, which speaks for itself,.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the

discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.


**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

**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.

**ANSWER:** UAMS objects to Claimants' Request as it is vague, ambiguous, argumentative, overbroad, calls for a legal conclusion, and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, this request is unduly burdensome as Claimants have the burden of proving their claims through expert testimony, and this Request impermissibly attempts to shift this burden to UAMS. Notwithstanding the objection, UAMS refers Claimants to the medical record, which speaks for itself.

Respectfully submitted,

UNIVERSITY OF ARKANSAS  
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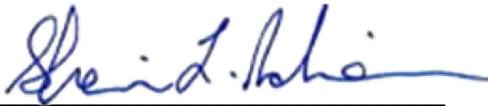
Attorney for Respondent

**CERTIFICATE OF SERVICE**

I, Sherri L. Robinson, do hereby certify that a copy of the foregoing discovery responses has been served on each Claimant herein by sending a copy by email as agreed upon by the parties, on this 18<sup>th</sup> day of July, 2025, to:

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Sherri L. Robinson