

**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 REQUEST FOR ADMISSIONS 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 Requests for Admissions propounded on Respondent pursuant to Arkansas Rules of Civil Procedure 33 and 34, requests 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 the Arkansas Rules of Civil Procedure 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.

## **REQUESTS FOR ADMISSIONS**

**REQUEST NUMBER 1:** Admit that Sean Lynn gave no informed consent to be treated at UAMS.

**ANSWER:** Denied. Consent is not required in Emergency Situations. Moreover, the person who was with Lynn in the emergency room gave consent for his admission and treatment at UAMS.

**REQUEST NUMBER 2:** Admit that Laura Hammett gave no informed consent for Sean Lynn to be treated at UAMS.

**ANSWER:** Denied. Hammett was not the patient or surrogate decisionmaker at the time of Lynn's admission to UAMS; thus, her consent was not required.

**REQUEST NUMBER 3:** Admit that Lisette Reyes was never married to Sean Lynn.

**ANSWER:** UAMS is without sufficient information, even after reasonable inquiry into the records readily available to it, to admit or deny the request, and therefore, denies the same.

**REQUEST NUMBER 4:** Admit that the consent form signed by Lisette Reyes shown at Med. Rec. 4/29/25 at page 1292 and 1293 says under section 1, Consent for Medical Treatment, "I understand that I have the right to consent to or refuse any recommended or proposed care, procedure or treatment."

**ANSWER:** Admitted.

**REQUEST NUMBER 5:** Admit that the consent form UAMS used during the period of January 13 to 27, 2024, said in the section titled Consent to Photographs and Recordings, “I understand that PRI and certain patient care areas in the Emergency Department are continuously monitored by video recording for the purpose of clinical care and patient safety.”

**ANSWER:** Admitted.

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

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

**REQUEST NUMBER 7:** Admit that Sean Lynn signed the “Discharge of Patient from Hospital Against Medical Advice” form shown on Med. Rec. 4/29/25 at page 1301.

**ANSWER:** Admitted.

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

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

**ANSWER:** Admitted.

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

**ANSWER:** Admitted.

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

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

**REQUEST NUMBER 11:** Admit that UAMS prescribed no benzodiazepines for Sean Lynn upon discharge from UAMS.

**ANSWER:** Admitted.

**REQUEST NUMBER 12:** Admit that Lynn tried to escape from UAMS.

**ANSWER:** Denied. Patient Lynn attempted to elope which is the act of a patient leaving a healthcare facility without authorization or notification when there are safety concerns for the patient based on the patient’s medical condition, which in this case, included cognitive impairment resulting from a traumatic brain injury.

**REQUEST NUMBER 13:** Admit that Sean Lynn expressed the desire to refuse treatment during his hospitalization.

**ANSWER:** Admitted that there are instances in the medical record where Lynn did refuse treatment.

**REQUEST NUMBER 14:** Admit UAMS performed procedures on Lynn after he had expressed refusal of consent.

**ANSWER:** Denied.

**REQUEST NUMBER 15:** Admit that UAMS staff administered sedatives to Sean Lynn against his will.

**ANSWER:** Denied.

**REQUEST NUMBER 16:** Admit that UAMS staff administered antipsychotic medications to Sean Lynn against his will.

**ANSWER:** Denied.

**REQUEST NUMBER 17:** Admit that Laura Hammett requested that Sean Lynn's care at UAMS avoid unnecessary pharmacological intervention.

**ANSWER:** Admitted that Lynn's medications were discussed with Hammett and Hammett expressed concern that the medications were contributing to Lynn's delirium. Denied that Lynn was given "unnecessary pharmacological intervention" while at UAMS.

**REQUEST NUMBER 18:** Admit that the video produced on the first production of documents, file name 20240127\_112300 Dr. Elizabeth Brown and two men guarding Sean from leaving was recorded on January 27, 2024 starting at about 11:31 a.m. We are not asking you to admit the truth of the statements; only that the dialogue captured in the video took place. The transcript following is provided for convenience.

Hammett: “Ok. Sean does not want to be here, I’ve had a lengthy discussion with him. We’ve discussed the possibility that he might die at home. Um, we’ve discussed the possibility that he might die here. And, uh, he does not want to be here, he does not have insurance and he does not want to pay for this. He has asked many times. He understands fully what is going on. And, like we’ve had long talks. I just played poker with him, and I have won World Series of Poker tournaments, and he just beat me. Poker takes a lot of logic, reasoning, so and Sean is different than most people. I don’t agree with everything he does in life, but it is his life, and so he can live it the way he wants to. He does not want to die in the hospital. He wants to die at home. And he thinks that he can get better care at home than he’s getting here, and I fully agree with him. Is there a way that you can have an assessment team come up and talk to him right now so that everything is documented really well, his state of mind, his ability to, um, consider the logical consequences of what he’s doing, and that he has considered those consequences?”

Elizabeth Brown, M.D. Resident physician: “He will be reassessed on Monday, (undistinguishable).”

Laura: “So on Monday, in two days? Sean, they are saying they want to reassess you in two days.”

Sean: “I just want to go. I don’t have anything to do today.”

Laura: “Ok. So why are you not letting him go?”

Elizabeth Brown, M.D.: “Because he does not have capacity yet. “

Laura: “Ok, but I’m his next of kin, and I have capacity.”

Elizabeth Brown, M.D.: “Unfortunately Sean is a consenting adult, and we have to have it from him, and, he’s on a 72-hour hold right now because he does not have the capacity yet, and he will be reassessed on Monday to see if he does have capacity.”

Laura: “So you’re saying he’s a consenting adult but he has no capacity?”

Elizabeth Brown, M.D.: “m, hmm.”

Laura: “That does not make sense.”

Elizabeth Brown, M.D.: “Well, you cannot make his medical decisions for him in regards to leaving because he is on a 72 hour hold and he has to stay until he is assessed for capacity.”

Laura: “You had him on a 72-hour hold starting last Sunday”

Elizabeth Brown, M.D.: “m, hmm, it has been restarted.”

Laura: “What is the criteria you’re using to hold him here against his will?”

Elizabeth Brown, M.D.: “Because he doesn’t have capacity to say whether or not he is here against his will or not. We don’t want him to be a danger to society, to himself, if he’s released.”

Laura: “How is he a danger to society if he is released?”

Elizabeth Brown, M.D.: “We don’t know because he doesn’t have capacity.”

Laura: “Well it seems to me that the doctor who reinserted the catheter doesn’t have capacity. Can we put him on a 72-hour hold?”

Man: “We’re not discussing that.

Elizabeth Brown, M.D.: “No, it’s not a part of this discussion.”

Man: “Ma’am, also “

Laura: “Sean do you understand that they are saying that you are on a 72-hour hold again?”

Sean: “I don’t know.”

Laura: “Ok, they’re saying that, they’re saying that you’re on a 72-hour hold, [like they did when [C.L.] was a baby.]” [Removed from YouTube video to protect a minor]

Sean: “I’ve been here for like 12 days.”

Laura: “Right.”

Sean: “Ya.”

Laura: “And do you understand that if you go home you might suddenly die?”



Sean: "I'm fine."

Laura: "I know, but do you understand that you're fine now - "

Sean: "ya"

Laura: "but that there's a good chance that you will not be fine in three days?"

Sean: "Ya, I'm, I'll be ok."

Laura: "Ok, what if you're not ok?"

Sean: "I could come back if I need to but, I don't need to."

Laura: "OK, what if all of a sudden you need to come back, but it's too late because it's better to be here? That's the reason I kept you here since last Sunday."

Sean: "Ok"

Laura: "Because if you have to suddenly come back, then you might not live that –"  
Jumbled talking. Man said "Do you have any questions?" Laura said "No it is against my will."

Sean: "---- (pointing at Dr. Brown) She wants to leave"

Laura: "(over man's voice) She wants to leave, ya, ok"

Man: "Ma'am, so it's against policy to record us so if you can please stop recording."

Laura: "Actually this is a single party consent state for recording."

Man: "Ok, do you have my consent to record me?"

Laura: "I don't need your consent."

Man: "Yes you do. Yes."

Laura: "No, I absolutely do not need your consent in Arkansas to record a conversation..."

Jumbled. Laura: "go to California"

Laura: "I already asked them for the policy and they did not give me one,"

Man: "OK"

Laura: "instead they put Sean on a 72-hour hold. That happened last week."

Man: "I'll have adon come in and we can discuss"

Laura: "ya, and have her bring a code."

Man: "Ok, I will"

Laura: "and Actually look up 42 USC 1983, a deprivation of Constitutional rights by...I believe that you are a government facility, I'm not positive on that one but I think that UAMS is government. So if you're government workers and you are taking Sean's Constitutional right to leave and to refuse treatment, or consent if he wanted to which he did not, he is not a consenting adult, he's a refusing adult, [medical staff starts walking out] so you go look up, you're smart enough, you can look up 42 USC 1983, and look up the cases under that law."

Elizabeth Brown, M.D.: "ok"

Laura: "and what's your name?"

Elizabeth Brown, M.D.: "I'm Doctor Brown."

Laura: "Doctor Brown, ok."

(Laura tries to zoom in on badge. Dr. Brown covers it and abruptly turns away)

Elizabeth Brown, M.D.: "I'm not consenting for you to do that."

Laura: "It's alright."

Sean: "Ok, we're leaving."

Laura: "Sean, you need to stay here. They said that you are on a 72-hour hold. They will restrain you if you leave. Do not let them restrain you. Just sit here and then you're going to sue their ass later. OK?"

Sean: "Let's go."

Laura: "Sean."

Sean: "What?"

Laura: "You're proving them right. They're wrong, but if you leave you're proving that they're right, because they're going to say 'only somebody who is stupid would leave. And they're saying oh, Laura wouldn't be able to –"

Sean: "Stop Mom."

Laura: "Ok."

Sean: "They know. That's not what they were saying earlier."

Laura: "Sean they just said 'You are on a 72-hour hold –"

Sean: "ok"

Laura: "I am not allowed to take you."

Sean: "Let's get out of here. We have to get out of here."

Laura: “Let me get – [Sean stands] What, stay here. Stay here because otherwise I can’t take you home.”

Sean: “Ok”

Laura: “Sean, I told you it might take me all day.

Sean: “ya”

Laura: “Ok sit down. I’m going to go do more. It might take me a long time. I need to get this done legally. Ok?”

Sean: “Mom, we ca-“

Laura: “I need to get this, I need to see the paper where you’re on a 72-hour hold.”

Sean: “We don’t have to. We can leave now.”

Laura: “No we can’t. That’s – “

Sean: “Why?”

Laura: “Because you don’t have the capacity to make that decision, meaning you don’t understand that they, they are the ones that will have the police come and keep you here.”

Sean: “We’re not.”

Laura: “Sean, trust me, if you leave this room – “

Sean: “Ok”

Laura: “They will have you restrained.”

(Over each other)

Sean: “If you want to do it go do it then.”

Laura: “Ok, I will go do it. I will be doing that. You can take a nap or eat some food.”

-End Transcript-

**ANSWER:** UAMS objects to the suggestion that the name Claimants have given the video is accurate or that the video and “transcript” accurately depict the full conversation with Lynn, Hammett and Lynn’s medical providers. Notwithstanding the objection, UAMS admits that the video produced appears to be recorded on January 27, 2024 starting at about 11:31 a.m.

**REQUEST FOR ADMISSION NO. 19:** Admit that UAMS performed no surgery on Lynn’s brain.

**ANSWER:** Admitted.

**REQUEST FOR ADMISSION NO.20:** Admit that UAMS used Chemical Restraints on Sean Lynn.

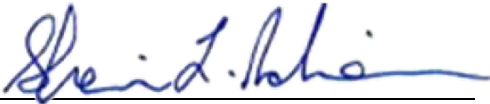
**ANSWER:** Denied.

**REQUEST FOR ADMISSION NO. 21:** Admit that UAMS used physical restraints on Sean Lynn.

**ANSWER:** Admitted. Physical restraints were used when necessary for the patient’s immediate physical safety.

Respectfully submitted,

UNIVERSITY OF ARKANSAS  
FOR MEDICAL SCIENCES,  
Respondent

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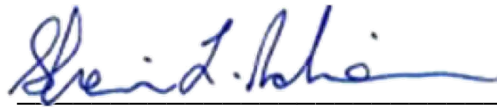
Attorney for Respondent

**CERTIFICATE OF SERVICE**

I, Sherri L. Robinson, do hereby certify that a copy of the foregoing pleading has been served on each Claimant herein by sending a copy by email, as agreed to by the parties, on this 16<sup>th</sup> day of July, 2025, to:

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