

BEFORE THE ARKANSAS STATE CLAIMS COMMISSION

SEAN LYNN AND
LAURA HAMMETT
CLAIMANTS

V.

NO. 250191

UNIVERSITY OF ARKANSAS
FOR MEDICAL SCIENCES
RESPONDENT

RESPONSE TO MOTION TO PLACE CASE IN ABEYANCE

Exhibit “B”

Letter from A.J. Gallagher Risk Management Services LLC, Third Party Administrator for The
Doctor’s Company, Professional Liability Carrier to Sean Lynn, postage \$1.03

Dated: September 30, 2025

Postmarked: October 1, 2025



Insurance | Risk Management | Consulting

17000 Chenal Parkway Suite 100
Little Rock, AR
USA

501-664-7705
www.ajg.com

September 30, 2025

Sean Lynn
10 Theresa Drive
N. Little Rock, AR 72118

RE: Sean Lynn
Our File: 177427
Insured: The Individual Named Health Care Providers of UAMS
DOI: January 13, 2024

Dear Mr. Lynn:

This letter is in response to the following:

1. Mrs. Hammett's telephone discussion with Jessica Dietrich on September 18, 2025. For your reference, I have attached a copy of my letter to Mrs. Hammett dated September 23, 2025. (I mistakenly stated September 19 in my letter to Mrs. Hammett.)
2. The notification received on September 29, 2025, from UAMS, informing our office that UAMS filed a motion to place your claim in abeyance with the Claims Commission, as you are pursuing a claim against UAMS-insured employees.
3. Your letter dated September 29, 2025, advising our office that Mrs. Hammett is your legal representative.

To address the matter directly, it seems that you and your mother are complicating what should be a straightforward process. I strongly encourage both of you to review the Arkansas Medical Malpractice Statute. Our process takes time, and modifying or changing allegations only adds unnecessary complexity and delays our findings of your claim. I recommend clearly identifying the party against whom you are making a claim and specifying the exact allegations.

I understand that Mrs. Hammett stated that the carrier was "denying coverage for Laura's damages." I want to clarify that a denial of liability or responsibility is not equivalent to a denial of coverage. While we will continue to defend our insureds, any claim for her loss will not be part of our review. Our focus will remain solely on the claims made against our insured's patient, which in this case is you, Sean Lynn.

Your letter dated September 29, 2025, also includes a request for certain accommodation. For your convenience, I have enclosed a copy of that letter. In it, you demanded that we provide accommodations under the Americans with Disabilities Act (ADA), including the services of a professional accommodator, text telephone (TTY), and CART services for the remainder of your life. If you qualify under the ADA, I assume you have already applied for and received these accommodations through the appropriate channels. At this time, I see no reason to consider these services as part of your claim.

Regarding your claim of 75% hearing loss allegedly caused by our insureds, we will include this as part of our review. To avoid any misunderstandings, I recommend that all future communications be conducted by letter. This will also eliminate the need for TTY and similar accommodations.

With respect to Mrs. Hammett acting as your representative, that is your choice. However, we cannot recognize her as your legal representative unless she has been formally appointed as such by the courts (e.g., as your legal guardian or administrator). Based on your success in poker tournaments, I assume you are mentally competent and that no court orders exist appointing her as your legal representative. Please confirm this.

Now, turning to the process of investigating your claims: The information I currently have is based on the third pro se complaint you and your mother filed with the Claims Commission. My investigation will begin anew, but I will use the basic allegations outlined in your complaint as a starting point. I have not yet reviewed any medical records. To proceed, I will need the following documentation, which must be obtained directly from the providers:

- **UAMS Records:** Since your claim involves UAMS doctors (our insureds), I have requested these records. Your complaint names Dr. Bruce, Dr. Martin, and Dr. Applebaum.
- **Medical Authorization for Non-UAMS Providers:** I will need authorization to obtain medical records from non-UAMS providers. Enclosed is a medical authorization form for you to complete and sign. Please provide the names of all your primary care physicians (PCPs), specialists, hospitals, and any other healthcare providers, both in-state and out-of-state. Additionally, include the names and addresses of any doctors who have provided medical opinions regarding your disability and ADA qualification.
- **Pharmacy Records:** I will also need the names of your pharmacies to obtain prescription records.

Please note that I am not an attorney, but the Arkansas Statute of Limitations for malpractice claims is two years. I cannot predict how long it will take to collect all necessary records and obtain independent reviews. Based on your most recent complaint filed with the State Claims Commission, your claim appears complex, but I will do my best to simplify the process.

It is your right to seek legal counsel. While I am willing to work with you directly, you may wish to retain an attorney who is experienced in these matters and can provide you with proper guidance. Should you decide to hire legal representation, I will gladly communicate with your attorney moving forward.

Please provide written communication if you require further clarification or if there are any misunderstandings.

Sincerely,

Steve Hillis
Vice President – HealthCare Claims
A.J. Gallagher Risk Management Services LLC dba Risk Management Resources

Sean Lynn
10 Theresa Drive
North Little Rock, Arkansas, 72118

September 29, 2025

A.J. Gallagher Risk Management Services LLC
Steve Hillis, Vice President—HealthCare Claims
17000 Chenal Parkway Suite 100
Little Rock, Arkansas, 72223

RE: Sean Lynn—Laura Hammett—UAMS
File: 177427
Insured: The Individual Named Health Care Providers of UAMS
DOI: January 13, 2024 to January 27, 2024

Dear Mr. Hillis on Behalf of the Insured,

I, Sean Lynn, hereby authorize my mother, Laura Hammett to commit my words to writing, receive a copy of all communications between A.J. Gallagher Risk Management Services LLC (“Gallagher”) and me, and participate in verbal conversations, whether by telephone or in person.

I demand that Gallagher allow me American with Disabilities Act accommodations. I previously made such authorization and demand to UAMS by Med Rec 99FR dated February 21, 2024; Letter to UAMS Department of Patient Relations, dated February 6, 2024; by telephone on several occasions; and manifested my intent to have my mother accommodate while imprisoned at UAMS.

I have 75% hearing loss, caused by your insureds; lingering aphasia, caused by your insureds; and Post Traumatic Stress Disorder, caused by your insureds. Receiving assistance from my mother is my normal method(s) of communication regarding communications of this nature, length, complexity, and context.

I will ask that the insureds pay for a professional accommodator, text telephones (TTYs), and CART services for the rest of my life, as I cannot afford to pay for these services now and my mother cannot wait indefinitely to be reimbursed for her time. She is carving out the time to assist me on this matter because she is a co-plaintiff.

Please note that I moved to the address above and send a copy of letters that you sent to my old address on Sierra Madre. Also send a second copy to Laura Hammett, 16 Gold Lake Club Road, Conway, Arkansas, 72032.

Thank you,

Sean Lynn _____, September 29, 2025



Insurance | Risk Management | Consulting

117000 Chenal Parkway Suite 100
Little Rock, AR
USA

501-664-7705
www.ajg.com

September 23, 2025

Laura Hammett,
16 Gold Lake Club Road
Conway, Arkansas 72032

RE: Sean Lynn
Our File: 177427
Insured: The Individual Named Health Care Providers of UAMS
DOI: January 13, 2024

Dear Mrs. Hammett:

I am writing in response to your September 19, 2025, telephone conversation with Jessica Dietrich. While Jessica and I are co-workers, she does not have any responsibilities related to claim or litigation management. As such, she will not be able to assist you or Sean with this matter moving forward. Please direct all future communications regarding this matter to my attention.

A.J. Gallagher Risk Management Services LLC, doing business as Risk Management Resources, serves as the third-party administrator (TPA) for The Individual Named Health Care Providers of UAMS and their professional liability carrier, The Doctors Company (TDC). Our role is limited to reviewing and investigating claims, hiring defense counsel, and engaging in settlement discussions on behalf of TDC and the Individual Named Health Care Providers of UAMS insured by TDC. Neither our involvement nor TDC's policy extends to claims or litigation involving UAMS as an institution.

Based on the information provided, the claims you and Sean have filed with the Claims Commission appear to pertain to Sean Lynn's medical care at UAMS in January 2024. I understand that you are seeking compensation for the alleged negligence by UAMS in Sean's medical care. However, I must clarify that our office and The Doctors Company are not involved in, nor will we participate in, any proceedings before the Claims Commission, including the hearing scheduled for November 7, 2025.

While I understand and acknowledge the theory you are advancing regarding your loss, I must respectfully confirm that your claim(s) would not be part of our investigation or evaluation at any time, as you were not the recipient of medical care.

Thank you for your understanding. Should you have any questions or require additional clarification, please do not hesitate to contact me directly.

Sincerely,

Steve Hillis

Steve Hillis

Vice President – HealthCare Claims

A.J. Gallagher Risk Management Services LLC dba Risk Management Resources