

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'
MOTION TO REMOVE OBJECTIONS,
COMPEL DISCOVERY RESPONSES AND IMPOSE SANCTIONS**

Comes now Respondent, University of Arkansas for Medical Sciences (UAMS), by and through its undersigned counsel, and for its Response to Claimants' Motion to Remove Objections, Compel Discovery Responses and Impose Sanctions, states as follows:

Introduction

Once again, Claimants have filed a motion for extreme relief on a specific limited issue and then proceeded to argue why all of their allegations in the case are true, and that UAMS and its employees are being intentionally difficult by not agreeing with Claimants' position. First and foremost, Claimants do not seem to understand, or accept, that they have the burden to prove their claims to the Commission. They also do not seem to understand that disagreeing with UAMS' discovery responses is not an invitation to argue, again, the points of their claims in an effort to persuade UAMS or the Commission that their allegations are true.

UAMS has repeatedly attempted to work with Claimants, most notably Hammett, who seems to be the only Claimant pursuing this matter; however, Hammett only wants to do things on her schedule and in the manner she prefers and

deems most appropriate. Hammett provides a recent example of this to the Commission via an email exchange with UAMS counsel which Hammett forwarded to the Commission on the afternoon of September 19, 2025. UAMS agreed to pause discovery until the Commission could rule on the pending motions before it set for hearing on November 7. However, Hammett wanted UAMS to also agree to her proposed schedule for continuing discovery regardless of a possible Commission order that may address discovery and set a different schedule.

UAMS and its counsel have not been dilatory, as Hammett alleges, but have been cooperative and have afforded Hammett the same treatment and candor they would afford any attorney. Though Hammett has made repeated statements to UAMS counsel and the Commission in pleadings and emails that she is competent to serve as her own legal representative and to understand the medical records just as well as a medical expert would in this case, the fact remains that Hammett is neither a doctor nor a lawyer. UAMS will demonstrate in this response that Claimants' motion should be denied and no relief in their favor should be granted.

Response to Claimants' Enumerated Statements/Allegations in their Motion

Significantly, Claimants make a blanket request to remove all objections without identifying and addressing the specific requests and why UAMS' objection is improper. UAMS requests that the Commission determine that Claimants' failure to address each request and objection separately in their Motion is insufficient.

1. UAMS Response to Paragraph 1: UAMS denies that Claimants have made a good faith effort to resolve the discovery dispute. Claimants did not set forth specific requests and the reasons why UAMS' objection to

the request was insufficient. Instead, Claimants resort to bullying tactics in essence implying “change your response or else” all while disparaging UAMS and its attorney. UAMS did, in fact, review all discovery responses and changed several, including setting forth more specific objections when appropriate. Again, Claimants disagree with how UAMS responded. If the goal is to provide the most accurate information available to Claimants, UAMS has tried to do so but maintained objections when appropriate.

UAMS notes that Claimants’ letters and attempts to meet and confer are also not specific or, when they are, they are inaccurate. For example, in Claimants’ Motion, Exhibit 1, letter dated August 29, 2025, page 2, Hammett complains that UAMS did not provide a floor plan to the emergency room nor was she allowed to see the emergency room while at UAMS to tour the hospital floor where Lynn was a patient for two weeks.¹ Request for Production No. 8 cited by Claimants does not ask for a map or description of the emergency department but refers to the location of surveillance cameras where “Lynn was housed or pursued.” While not defined, the logical conclusion is that Lynn was “housed” on the fourth floor because he was there from January 13-27, 2024. UAMS

¹ UAMS counsel notes that only the fourth floor was discussed prior to Hammett’s tour. She did not mention the emergency department until she was at UAMS touring the fourth floor. The UAMS emergency department is very busy and often full, and it would have been disruptive for Hammett, UAMS counsel, and the Chief of Security to wander through the emergency department so Hammett could look at cameras which have no relevance to Claimants’ claims before the Commission.

provided the floor plan for that floor with the location of surveillance cameras. Had Claimants wanted the information for the Emergency Department, they should have specifically requested it.

2. UAMS Response to Paragraph 2: UAMS has not refused to participate in meet and confer requests by Claimants. UAMS counsel has met with Hammett in person on two occasions, but neither meeting was productive. UAMS is unsure what Claimants mean by counsel “demanded more time to respond to the written communications” other than perhaps UAMS counsel indicating that she could not provide a response on the timeline provide by Claimants. UAMS has consistently engaged in good faith efforts to provide the most accurate information in discovery, including but not limited to, reviewing UAMS’ discovery responses to all four sets propounded by Claimants² and revising them when appropriate.
3. UAMS Response to Paragraph 3: Claimants’ position that “amended and substituted” discovery responses are not allowed is incorrect. Rule 26(e)(1) of the Arkansas Rules of Civil Procedure states: “A party is under a duty seasonably to amend a prior response to an interrogatory, request for production, or request for admission if the party learns that the response is in some material respect incomplete or incorrect.” UAMS counsel reviewed all discovery responses previously provided on behalf of UAMS and amended those responses that were incomplete or incorrect.

² This includes 88 interrogatories, 41 requests for production and 21 requests for admissions.

4. UAMS Response to Paragraph 4: UAMS denies Claimants' allegations. Claimants want UAMS to respond in a manner that agrees with Claimants' allegations regardless of the lack of evidence to support the allegations.
5. UAMS Response to Paragraph 5: Claimants are incorrect. Claimants served their First Set of Interrogatories and Requests for Production (First Set of Discovery) on May 22, 2025. On June 16, 2025, they served the Second Set of Interrogatories and Requests for Production (Second Set of Discovery) as well as their First Set of Requests for Admission (Third Set of Discovery). On June 24, 2024, UAMS counsel emailed Hammett to request an extension to respond to the First Set of Discovery to July 18, 2024, to which Hammett agreed. (See Response Exhibit 1). UAMS provided answers to the Third Set of Discovery on July 16, 2025, which was within the 30-day period allowed by the Arkansas Rules of Civil Procedure and answers to the First Set of Discovery on the agreed upon extended date of July 18, 2025. (Response Exhibit 2). In the email sent on July 18 with UAMS' responses to the First Set of Discovery, UAMS counsel also advised that she would need an additional 10 days to complete responses to the Second Set of Discovery because some of the people she needed to consult on responses had not been available. (Id.).³ Hammett did not object to the extension but stated "We will not make

³ UAMS counsel recalls discussing the need for extension on the Second Set of Discovery when Hammett was on the UAMS campus on July 1, 2025; however, counsel failed to document that conversation with a follow up email.

any effort to compel responses before July 28, 2025.” (Exhibit 3). UAMS provided responses to the Second Set of Discovery on July 24, only six days later.

6. UAMS Response to Paragraph 6: UAMS denies that its responses were “grossly deficient and repetitive.” Because Claimants disagreed with some of the objections, UAMS counsel tried to better explain those in the Amended and Substituted Responses or to provide information while maintaining UAMS’ objection. That Claimants disagree does not make the responses deficient or inappropriate under the governing rules. Moreover, Claimants have not specified how any individual response is deficient.
7. UAMS Response to Paragraphs 7-8: Reading paragraphs 7-8 on page 3 of Claimants’ motion, Claimants allege that “UAMS introduced contentions that were non-responsive and denied statements for which there is no genuine dispute, multiplying the issues” (¶ 7) and then cited only UAMS’ denial of Request for Admission No. 1. (¶8). Interestingly, in paragraph 8, Claimants go on to state vaguely that statements exist in the medical record along with video evident to support that Lynn told UAMS to stop while he struggled to leave. Claimants provide no context to this information, and they completely disregard the amended and substituted answer provided by UAMS.

REQUEST [FOR ADMISSION] NUMBER 1: Admit that Sean Lynn gave no informed consent to be treated at UAMS.

[UAMS ORIGINAL] 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.

[UAMS] AMENDED AND SUBSTITUTED ANSWER: UAMS admits that Lynn's written consent was not received upon his admission to UAMS; however, UAMS denies that it was required. Arkansas Code Annotated § 20-9-603 provides that "when an emergency exists and there is no one immediately available who is authorized, empowered to, or capable of consent," then "consent is excused or implied at law" for a licensed physician to provide medical treatment. Lynn arrived at UAMS by ambulance, and EMS personnel notified medical providers that he had fallen from a ladder at a height of 30-35 feet. EMS advised UAMS that Lynn had experienced a loss of consciousness, and UAMS providers observed that Lynn was continuing to have confusion. As a result of the initial assessment, Lynn was admitted to the Emergency Department Trauma Service. No one was with Lynn in the emergency room, and he was not capable of giving consent at that time. Based on the information that UAMS had at that moment and the nature of Lynn injuries, an emergency under Ark. Code Ann. § 20-9-603 existed which excused the requirement for UAMS to obtain consent to treat him.

Not only does UAMS admit that the written consent was not received but also explains in detail why the written consent was not required.

Claimants' arguments against UAMS' position are inappropriate to the present motion but should be reserved for argument in their case-in-chief should this matter make it to a hearing.

8. UAMS Response to Paragraph 9: Claimants are incorrect. As UAMS explained in paragraph 3 above, its Amended and Substituted responses to all four sets of discovery propounded by Claimants are appropriate under Rule 26 of the Arkansas Rules of Civil Procedure.
9. UAMS Response to Paragraph 10: Claimants continue to make argument that should be reserved for a hearing rather than in a disagreement in discovery. Additionally, Claimants, primarily Hammett, make factual

arguments that she is not qualified to make. That a medication may be designed for a specific purpose or classified as a type of drug does not preclude its use for other medically appropriate reasons. UAMS provided information on consent and on the medications in their Amended and Substituted Responses to Claimants' Requests for Admission. Claimants' disagreement with the information does not make it wrong or support their motion.

10. UAMS Response to Paragraph 11: UAMS denies Claimants allegations.

They do not provide expert medical testimony to refute UAMS' conclusion that Lynn suffered an emergency and life-threatening condition in the form of a traumatic brain injury (TBI). That Claimants disagree with the diagnosis and treatment thereof is insufficient.

11. UAMS Response to Paragraph 12: UAMS denies that any of its employees committed a criminal battery on Lynn. To UAMS' knowledge, Lynn has not sought to prosecute any UAMS employee with the Pulaski County Prosecutor's Office.

12. UAMS Response to Paragraph 13: There is no UAMS employee responsible for destroying video evidence. The security video system is designed to automatically overwrite footage every 30 days because UAMS does not have the ability to keep all video footage throughout the campus for an extended period of time. This is a matter of policy; there is no specific employee to blame. As UAMS explained in its responses to First Set of Discovery and Response to the Motion for Spoliation Sanctions,

Claimants did not make specific statements within the 30-day timeframe requiring that UAMS implement a preservation hold on security video footage for the two-week period Lynn was hospitalized. General statements that they were going to sue, without more, is insufficient. Without a specific request to archive security video footage, which included an event that occurred on a specific date and in a specific location, UAMS was not under an obligation to preserve any video security footage.

13. UAMS Response to Paragraph 14: Claimants' allegations in this paragraph are unclear. To the extent a response is required, the allegations are denied.

14. UAMS Response to Paragraph 15: UAMS agrees and reiterates that the Amended and Substituted Responses are appropriate under Arkansas Rule of Civil Procedure 26.

15. UAMS Response to Paragraph 16: UAMS denies Claimants' allegations. Rule 33(d) of the Arkansas Rules of Civil Procedure that states: "*Option to Produce Business Records. Where the answers to an interrogatory may be derived or ascertained from the business records of the party upon whom the interrogatory has been served or from an examination, audit or inspection of such business records, or from a compilation, abstract or summary based thereon, **and** the burden of deriving or ascertaining the answer is substantially the same for the party serving the interrogatory as for the party served, it is a sufficient answer to such interrogatory to*

specify the records from which the answer may be derived or ascertained and to afford to the party serving the interrogatory reasonable opportunity to examine, audit or inspect such records and to make copies, compilations, abstracts or summaries. A specification shall be in sufficient detail to permit the interrogating party to locate and to identify, as readily as can the party served, the records from which the answer may be ascertained.” (emphasis added).

UAMS counsel provided Hammett an electronic copy of the Legal Medical Record, in pdf format, generated on April 29, 2025. Because it was provided electronically and is in a searchable pdf format, both parties have the same access to the same record and the same burden to search the record and locate the specific information desired.

16. UAMS Response to Paragraph 17: UAMS agrees that Claimants accurately set forth Interrogatory No. 72 and UAMS’ Answer. Critically, UAMS referred to the Legal Medical Record, which is acceptable under Arkansas Rule of Civil Procedure 33 as cited in paragraph 15 above. Claimants know that Lynn was diagnosed with a TBI. A quick search of the electronic version of the Legal Medical Record shows that “traumatic brain injury” appears 45 times and “TBI” appears 89. Several of those entries include information on the impact that the TBI was having on Lynn. If Claimants had a medical expert, as the medical injury statute requires, the medical expert could explain why a TBI in and of itself is an “emergency situation.”

17. UAMS Response to Paragraph 18: UAMS denies Claimants' allegations.

The evidence of Lynn's TBI is clearly set forth in the Legal Medical Record and medical experts in the appropriate discipline would also be able to discern that and explain it to Claimants. The emergent nature of Lynn's injuries is obvious to medical experts which also supports UAMS' position that because of the existing emergency, Lynn's consent was excused under Arkansas law.

18. UAMS Response to Paragraph 19: UAMS denies Claimants' allegations

and asserts that the legal requirement of a medical expert at the summary judgment or final hearing phase is well-grounded in Arkansas law. UAMS is not required to move for dismissal of the initial claim because Claimants do not have to have a medical expert at the time of the initial filing. However, the Commission consistently orders the dismissal of claims at the hearing stage if a claim requires medical expert testimony, and a claimant cannot produce it. If Claimants do not produce a medical expert by the conclusion of the discovery phase in this case, they cannot succeed on any of their claims in this matter, and UAMS will file the appropriate motion at that time.

19. UAMS Response to Paragraph 20: As UAMS has already stated

throughout this response, their Amended and Substituted responses to all four sets of Claimants' discovery are appropriate under the Arkansas Rules of Civil Procedure. UAMS supplemented the responses as required and allowed by Rule 26.

20. UAMS Response to Paragraph 21: For the reasons set forth in paragraphs 1-19 herein, UAMS denies that Claimants are entitled to the removal of any objections. Claimants have not provided factual or legal support to remove any of UAMS' objections.
21. UAMS Response to Paragraph 22: For the reasons set forth in paragraphs 1-20 herein, UAMS denies that it has failed to respond to all of Claimants' discovery requests in good faith. Claimants have not demonstrated a factual or legal basis for the Commission to find otherwise.
22. UAMS Response to Paragraph 23: For the reasons set forth in paragraphs 1-21 herein, UAMS denies that Claimants are entitled to the relief requested, and Claimants have not demonstrated a factual or legal basis for the Commission to find otherwise. Moreover, thus far, the only relevant documentary evidence that exists in this case is the Legal Medical Record generated on April 29, 2025, which Claimants cannot dispute was provided in a timely manner in the litigation.
23. UAMS Response to Paragraph 24: For the reasons set forth in paragraphs 1-22 herein, UAMS denies that Claimants are entitled to the relief requested, and Claimants have not demonstrated a factual or legal basis for the Commission to find otherwise. Furthermore, the cost-shifting that Claimants propose with regard to depositions is not allowed under Arkansas law.
24. UAMS Response to Paragraph 25: For the reasons set forth in paragraphs 1-23 herein, UAMS denies Claimants' allegations. Again, Hammet resorts

to disparaging, and even defamatory comments, as UAMS counsel is the person gathering the information to respond to the discovery requests. Hammet continues to use bullying tactics in an attempt to compel UAMS settle the case. UAMS maintains, and the Legal Medical Record supports, that Lynn suffered an emergency, life-threatening injury on July 13, 2024 that UAMS correctly diagnosed as a TBI and treated appropriately. Claimants have not, and cannot, produce any medical evidence to the contrary.

25. UAMS Response to Paragraph 26: UAMS denies Claimants' allegations.

While several definitions were similar, Claimants added at least four definitions that were objectionable especially as they attempt to change words generally used in the medical profession or define words in an argumentative way that is not supported by the Legal Medical Record. Nonetheless, UAMS counsel's objections to the definitions do not impact the validity or appropriateness of UAMS' discovery responses in any way.

26. UAMS Response to Paragraph 27: For the reasons set forth in paragraphs 1-25 herein, UAMS denies Claimants' allegations.

27. UAMS Response to Paragraph 28: The Legal Medical Record refers to the record requested and released. The records produced on February 13, 2024 and March 29, 2024 were produced based on what was selected on release form submitted by Claimants. While both versions of these records were "legal" medical records, they were only portions of the record as requested by Claimants. UAMS counsel requested a copy of the entire

Legal Medical Record which was generated on April 29, 2025. Using this record ensures that the parties and the Commission are all utilizing the same version of the record with the same page numbers. UAMS denies that anything requested during this litigation with regard to the Legal Medical Record has been withheld. Radiology reports are contained in the Legal Medical Record. Radiology images are maintained by Radiology because a special program is required in order to view the images. A CD was produced to Hammett containing the images and the viewing program on or about August 5, 2025.

28. UAMS Response to Paragraphs 29-30: UAMS denies Claimants' allegations that the objection is inappropriate. Moreover, Claimants do not provide any legal support for their position.

29. UAMS Response to Paragraph 31: UAMS denies Claimants' allegations. All of Claimants' claims are intertwined with the issue of whether UAMS healthcare team met the relevant standard of care in diagnosing and treating Lynn after his fall from the ladder. In fact, in the Third Amended Claim, Claimants specifically state they are making a medical injury claim. A TBI is a very complicated injury that impacts individuals differently and requires medical expert testimony for Claimants to meet their burden to prove any injuries can be attributed to UAMS.

30. UAMS Response to Paragraph 32: UAMS denies Claimants' allegations. UAMS has already addressed the Legal Medical Record issues in number 15 above. When UAMS appropriately referred Claimants to medical

record as a response to an interrogatory, counsel used the phrase “speaks for itself” meaning the answer is found within the medical record. That response is accurate, and Claimants have not proven otherwise. All information regarding Lynn’s diagnosis and treatment is contained in the Legal Medical Record. There are occasions that healthcare personnel, including residents and trainees, may make paper notes that are then entered into the record and the paper notes are immediately shredded. There is no legal obligation for UAMS to maintain those notes after the information is entered in the patient’s electronic chart. Additionally, many trainees’ notes contain learning information not specific to the patient that would not be appropriate to place in a patient’s chart. Reviewing the four sets of discovery requests that Claimants propounded, they did not request emails or policies about video recording. If Hammett requested those during Lynn’s hospital stay as she purports in a video of a resident, that is not considered a request during the litigation.

31. UAMS Response to Paragraph 33: UAMS denies Claimants’ allegations.

Of the 41 requests for production, UAMS responded to 12 requests without objection, 25 requests with a specific objection but with additional information provided or referenced by “notwithstanding the objection,” and only four requests were fully objected to with no additional information provided or referenced. UAMS already addressed Claimants’ reference to the emergency department floor plan in paragraph 1 of this document.

Response to Claimants' Brief in Support

As Claimants have divided the brief into sections III to VI, UAMS will address each section separately.

"III. Boilerplate Objections, purposefully false answers and non-responsive material are improper."

UAMS denies the allegation and that its responses were boilerplate objections, purposefully false or non-responsive. Claimants have not explained how the information provided to them in the Amended and Substituted responses to the four discovery sets is insufficient. Instead, they make inaccurate and unsupported statements throughout the document. For example, Claimants state: "General or boilerplate objections are improper. The objecting party must show specifically how each interrogatory is burdensome, irrelevant, or otherwise objectionable." (Motion, p. 11). Claimants cite no authority for this position. Immediately prior to these two sentences, she cites Rule 33 of the Arkansas Rules of Civil Procedure. However, Rule 33 does not support Claimants' expounded proposition. It simply states: "All grounds for an objection to an interrogatory shall be stated with specificity." Ark. R. Civ. P. 33(b)(4). UAMS specifically provides the grounds for each of its objections, and the bases for the objections are obvious based on the nature of the requests.

In the next paragraph, Claimants refer to deponents failing to answer a question; however, Claimants have not taken any depositions in this matter. The only request that Hammett made to tour the emergency department was while she was at UAMS on a pre-arranged tour of the ICU. As UAMS explains on page three, footnote one of this response, the emergency department is very busy and a tour of

the area just to look at cameras would be unduly burdensome and irrelevant to the issues raised in this case.

Next, Claimants cite Rules 33 and 34 of the Arkansas Rules of Civil Procedure stating that each request must be answered separately and objections stated separately and answers to the extent the responding party does not object. As Claimant does not cite to what content they are referring, it is difficult to formulate a response except to state that UAMS responded to each interrogatory and request for production separately, provided objections, when applicable, to the requests separately, and answered each request to the extent it was not objectionable. Moreover, UAMS provided Amended and Substituted responses to all four sets of discovery to ensure that complete and accurate information was provided, or objections were appropriate and preserved.

“IV. The UAMS statement that Claimants have the burden of proving their claims through expert testimony is false.”

Claimants have very clearly put forth arguments disagreeing with the medical diagnosis and treatment of Lynn. In fact, the Third Amended Claim, Count I, is for medical injury pursuant to Arkansas Code Annotated §§ 16-114-201 to 16-114-214. (Third Amended Claim, p. 27). Lynn’s so called medical injury is the basis for all other claims raised—false imprisonment and battery raised by Lynn—and—fraud and breach of fiduciary duty raised by Hammett. All of these claims are premised on the argument that UAMS providers were negligent in their diagnosis and treatment of Lynn during his two-week hospitalization.

Arkansas Code Annotated § 16-114-201 defines a medical injury as “any adverse consequences arising out of or sustained in the course of the professional

services being rendered by a medical care provider to a patient or resident, whether resulting from negligence, error, or omission in the performance of such services; or from rendition of such services without informed consent.” (emphasis added). Claimants have raised all aspects of this definition in their Third Amended Complaint. They allege that UAMS did not have informed consent, that Lynn was not really hurt much at all and should have been discharged the same day as his arrival at UAMS, and that the treatment rendered to Lynn was inappropriate and unnecessary. The Legal Medical Record, the only medical evidence before the Commission, proves otherwise, and Claimants steadfastly maintain that Hammett is qualified to refute the medical evidence without the aid of a medical expert.

It is clear based on the injuries detailed in the Legal Medical Record that Lynn suffered from a TBI. Anyone can find information on TBIs by researching the internet. However, only a trained medical provider can explain how to diagnose a TBI, the impact or potential impact of a TBI on a patient, whether lingering symptoms are more likely than not related to a TBI, and most importantly whether medical providers met the standard of care when diagnosing and providing medical treatment to a patient with a TBI. For these reasons, Claimant must comply with Arkansas Code Annotated § 16-114-206 which requires that they present “expert testimony . . . by a medical provider of the same specialty . . ., the degree of skill and learning ordinarily possessed and used by members of the profession of the medical care provider in good standing, engaged in the same type of practice or specialty in the locality in which he or she practices or in a similar locality.” Thus far, Claimants

refuse to acknowledge this requirement, and nothing they have argued in their brief changes these requirements of the law.

“V. The medical record does not ‘speak for itself.’”

Claimants’ arguments in this section are legally incorrect. UAMS addressed this in paragraph 15 above and this section of Claimants’ brief does not alter UAMS’ argument or the authority provided in support of the argument. Rule 33(d) of the Arkansas Rules of Civil Procedure very clearly allows for a party to provide documents in response to an interrogatory. Moreover, if the information in the document is readily available to the same extent to both parties, UAMS is not obligated to point Claimants to the specific locations in the record that supports the response. *Id.* Again, the significant problem here is that Claimants do not understand the medical record and refuse to hire a medical expert.

In paragraph 3 above, UAMS has also already addressed the filing of its amended and substituted responses which is also allowed under Rule 26(e) of the Arkansas Rules of Civil Procedure. If Claimants want the most complete and accurate information from UAMS, the amended and substituted responses are the best source of information.

“VI. Prayer for Relief.”

UAMS denies that Claimants are entitled to any relief in this matter. Contrary to Claimants’ allegations, UAMS has not intentionally provided false information or tried to hide information. Claimants are bound by the rules of litigation that they have elected to pursue. Those rules allow the parties to request information in discovery that is “relevant to the issues,” which includes the claims or defenses in the

action. Ark. R. Civ. P. 33(b)(1). Many of Claimants' requests in discovery have been wholly irrelevant to the claims and defenses raised and would not lead the discovery of relevant or admissible information. For example, Claimants made discovery requests about what Lynn wearing at various times or Hammett's age at the time of Lynn's hospitalization. Furthermore, Claimants' discovery requests, emails and motions have been harassing and abusive to both UAMS employees and UAMS counsel. Under the rules, UAMS is allowed to object to these types of requests. Despite the initial objections, UAMS has diligently reviewed and revised many responses even if it has still been unable to give Claimants the answer they demand. Claimants' demands or disagreements do not mean that UAMS' responses are incorrect or disallowed under the governing authority, and Claimants' motion and brief do not prove otherwise.

Even if the Commission disagrees with some of the objections raised by UAMS, the objections have been raised in good faith, and UAMS counsel has been cooperative in this process. While Claimants have requested sanctions in some form, monetary sanctions are not allowed against UAMS under Rule 37(f) of the Arkansas Rules of Civil Procedure, which states: "Except to the extent permitted by statute, expenses and fees may not be awarded against the state of Arkansas under this rule."

As result, Claimants' motion should be denied in its entirety.

WHEREFORE, Respondent respectfully requests that Claimants' Motion for to Remove Objections, Compel Discovery Responses, and Impose Sanctions be denied, and for all other relief to which it may be entitled.

Respectfully submitted,

UNIVERSITY OF ARKANSAS
FOR MEDICAL SCIENCES,
Respondent

By:



SHERRI L. ROBINSON, #97194
Sr. Associate General Counsel
University of Arkansas for Medical
Sciences 4301 West Markham, Slot 860
Little Rock, AR 72205
(501) 686-7608
SLRobinson@uams.edu

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, with Claimants' permission, to the email addresses below, on this 3rd day of October, 2025, to:

Sean Lynn
seanlynnp@yahoo.com

Laura Hammett
Bohemian_books@yahoo.com



Sherri L. Robinson

From: [Laura Lynn](#)
To: [Robinson, Sherri](#)
Subject: Re: Discovery to UAMS - Set 1
Date: Tuesday, June 24, 2025 9:09:16 AM
Attachments: [image001.png](#)

This Message Is From an External Sender

This message came from outside your organization.

Good morning, Sherri,

An extension to July 18 is fine with us. Sean has plans to travel the last two weeks in July, so please do not plan anything that requires his attendance then.

When is the next good day (not today) for us to reschedule my site visit? We also need to scan the records of Sean's medical after his release. We didn't get to that folder last time.

Thank you,

Laura

On Tuesday, June 24, 2025 at 08:34:20 AM CDT, Robinson, Sherri <slrobinson@uams.edu> wrote:

Good morning, Laura,

I believe that my responses to your first set of discovery is due to you today. May I please extend that to July 18? I hope to respond to all 3 sets by that date.

Thank you in advance for your consideration.

Best,

Sherri L. Robinson

Sr. Associate General Counsel

Office of General Counsel

University of Arkansas for Medical Sciences

4301 W. Markham St., #860

Little Rock, AR 72205-7199

Main: 501-686-7964; Mitel: 10648

Email: SLRobinson@UAMS.edu

UAMS.edu|UAMSHHealth.com



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From: [Robinson, Sherri](#)
To: [Seanlynnp](#); [Laura Lynn](#)
Subject: UAMS Answers to Claimants" First Set of Interrogatories and Requests for Production
Date: Friday, July 18, 2025 3:25:00 PM
Attachments: [image001.png](#)
[UAMS Answers to First set of Interrogatories and Requests for Production.pdf](#)
[Response to RFP No. 8.pdf](#)
[Response to RFP No. 14.pdf](#)

Dear Mr. Lynn and Mrs. Hammett,

Attached please find UAMS' Answers to Claimants' First Set of Interrogatories and Requests for Production along with 2 documents referenced in the Answers. I must also request an additional 10 days to respond to the second set. Some of the folks I need to consult have not been available this week.

Sincerely,

Sherri L. Robinson

Sr. Associate General Counsel
Office of General Counsel

University of Arkansas for Medical Sciences

4301 W. Markham St., #860

Little Rock, AR 72205-7199

Main: 501-686-7964; Mitel: 10648

Email: SLRobinson@UAMS.edu

UAMS.edu | UAMSHHealth.com



From: [Laura Lynn](#)
To: [Robinson, Sherri](#)
Subject: Re: UAMS Answers to Claimants' First Set of Interrogatories and Requests for Production
Date: Monday, July 21, 2025 3:35:05 PM
Attachments: [image001.png](#)

This Message Is From an External Sender

This message came from outside your organization.

Dear Mrs. Robinson,

We will not make any effort to compel responses before July 28, 2025.

Regards,

Sean Lynn and Laura Hammett

On Friday, July 18, 2025 at 03:25:51 PM CDT, Robinson, Sherri <slrobinson@uams.edu> wrote:

Dear Mr. Lynn and Mrs. Hammett,

Attached please find UAMS' Answers to Claimants' First Set of Interrogatories and Requests for Production along with 2 documents referenced in the Answers. I must also request an additional 10 days to respond to the second set. Some of the folks I need to consult have not been available this week.

Sincerely,

Sherri L. Robinson

Sr. Associate General Counsel

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