

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

**SEAN LYNN and
LAURA HAMMETT**

PLAINTIFFS

V. CASE NO. 60CV-26-216

**BOARD OF TRUSTEES OF THE
UNIVERSITY OF ARKANSAS; et al.**

DEFENDANTS

**MOTION FOR PROTECTIVE ORDER
ON BEHALF OF SEPARATE DEFENDANT
BOARD OF TRUSTEES OF THE UNIVERSITY OF ARKANSAS**

Comes now Separate Defendant, Board of Trustees of the University of Arkansas (Board), by and through the undersigned counsel, and for its Motion for Protective Order, states:

1. Plaintiff Hammett served one interrogatory on the Board through the Board Chair, Kelly Eichler, which was received on February 24, 2026. (See Exhibit A).
2. Hammett’s sole interrogatory requests that the Board “identify” each of the 81 named defendants listed in Hammett's lawsuit and provide the “last known address and contact information.” (Id.).
3. Hammett is not entitled to the information she requests for any individual listed because she has demonstrated harassing and abusive behavior already toward some of the named defendants individually; the University of Arkansas for Medical Sciences (UAMS), the individuals’ employer or former employer; counsel for the Board and UAMS; as well as representatives of A.J. Gallagher. (See Exhibit B).

4. Hamett is not entitled to the information she requests for several individuals as she has not stated a claim against these defendants in the Complaint upon which the Court may grant relief.
5. Hammett is not entitled to the information for Dr. Joseph Margolick because she has already served him with a copy of the Complaint, and any future contact with Dr. Margolick should be made to his attorney who has filed an Answer in this matter.
6. If the Court finds that Hammett is entitled to the last known contact information for any of the individuals as requested in Exhibit A, the Board requests that the Court enter its proposed Protective Order to maintain the confidentiality of the personal contact information of the parties provided in response to discovery. (See Exhibit C).
7. Counsel for Separate Defendant attempted in good faith to confer with Plaintiffs on this matter; however, Hammett did not provide an alternative Protective Order as she stated she would. (See Exhibit D).
8. The following exhibits are attached in support of this motion:
 - a. Exhibit A – Plaintiff Hammett’s First Interrogatory to the Board of Trustees of the University of Arkansas
 - b. Exhibit B – Examples of Plaintiff Hammett’s harassing and abusive tactics
 - c. Exhibit C – Proposed Protective Order
 - d. Exhibit D – Email chain between counsel for the Board and Plaintiffs

9. The grounds for this motion are more fully set forth in a brief in support.

WHEREFORE, Separate Defendant, Board of Trustees of the University of Arkansas, respectfully requests that the Court entered an Order denying Plaintiff Hammett's request in Interrogatory No. 1 or in the alternative, enter Separate Defendant's Proposed Protective Order and for all other relief to which it is entitled.

Respectfully submitted,

THE BOARD OF TRUSTEES OF
THE UNIVERSITY OF ARKANSAS

BY: /s/ Sherri L. Robinson
SHERRI L. ROBINSON, #97194
Sr. Associate General Counsel
University of Arkansas System | UAMS
4301 West Markham, Slot 860
Little Rock, AR 72205
(501) 686-7608
SLRobinson@uams.edu

Attorney for Separate Defendant,
Board of Trustees of the University of Arkansas

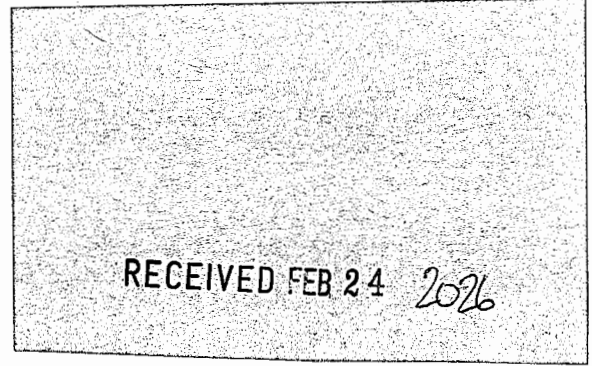
CERTIFICATE OF SERVICE

I, Sherri L. Robinson, hereby certify that on March 24, 2026, I filed the foregoing electronically with the Clerk of Court using the Arkansas Judiciary Electronic Filing System, which shall send notification to any other attorneys in this matter. I also mailed a copy by U.S. Mail, postage prepaid to both Plaintiffs:

Sean Lynn, Pro Se
10 Theresa Drive North
Little Rock, AR 72118

Laura Lynn Hammett, Pro Se
16 Gold Lake Club Road
Conway, AR 72032

/s/ Sherri L. Robinson
Sherri L. Robinson



IN THE CIRCUIT COURT OF PULASKI, ARKANSAS

12th DIVISION – 6th CIRCUIT

SEAN LYNN; and
LAURA HAMMETT

PLAINTIFFS

vs.

Case No.: 60-CV-26-216

BOARD OF TRUSTEES of the UNIVERSITY
of ARKANSAS, in their official capacity, et al.

DEFENDANTS

Plaintiff Laura Hammett's First Interrogatory to the Board of Trustees of the University of Arkansas, in their official capacity.

INSTRUCTIONS

1. This interrogatory must be answered separately and fully in writing under oath, in accordance with Ark. R. Civ. P. 33.
2. If you object to this interrogatory, state the specific grounds for your objection and answer the portion of the interrogatory to which you do not object.
3. If you cannot answer this interrogatory in full, answer to the extent possible, stating the reason for your inability to answer the remainder and specifying what information or knowledge you have concerning the unanswered portion.

4. If you claim any privilege or protection as to any information requested, identify the nature of the privilege or protection and provide sufficient information to allow assessment of the claim.

5. These interrogatories are continuing in nature. If you obtain additional information responsive to this interrogatory, you are required to supplement your answers in accordance with Ark. R. Civ. P. 26(e).

INTERROGATORIES

Interrogatory No. 1: Identify each person listed, including his or her last known address and contact information, who was employed by or contracted with UAMS during any time after January 12, 2024 who is named as a defendant in this action:

- (a) Karrar Aljiboori;
- (b) Natalie J. Applebaum;
- (c) Timothy J. Baer;
- (d) Jarred M. Baxter;
- (e) Alexis Beavers;
- (f) Rebekah Danielle Beene;
- (g) Britney M. Beumeler;
- (h) Kristy Bienvenu;
- (i) Jennings R. Boyette;
- (j) Carol Brizzolara;
- (k) Cejae Brown;
- (l) Elizabeth Brown;
- (m) Nolan R. Bruce;

- (n) Amber Bryant;
- (o) Elizabeth Cate;
- (p) Christopher S. Cathcart;
- (q) Shannon Cobb;
- (r) Benjamin L. Davis;
- (s) Prashanth Reddy Damalcheruvu;
- (t) Rebekah Davis;
- (u) Joseph P. Deloach;
- (v) Amanda Diehl;
- (w) Jaicey Dowd;
- (x) Nathan Ernst;
- (y) James Fitsimones;
- (z) Chrystal T. Fullen;
- (aa) Macall Gilmartin;
- (bb) Tyler Gray;
- (cc) Emily Gray;
- (dd) Jordan W. Greer;
- (ee) Shannon Hankins;
- (ff) Brandon Hearn;
- (gg) Rachel Hill;
- (hh) Mi-Ran Kim;
- (ii) Mary K. "Katie" Kimbrough;
- (jj) Alyssa Kirkpatrick;

- (kk) Jacob Langston;
- (ll) Eric Lambert;
- (mm) Payton D. Lea;
- (nn) Ariana Limon;
- (oo) Noah Lloyd;
- (pp) Joseph F. Margolick;
- (qq) Sarah E. Martin;
- (rr) Tyree McClure;
- (ss) Zachary A. McConnell;
- (tt) Elizabeth McNulty;
- (uu) Jordan Millsapps;
- (vv) Anna G. Morris;
- (ww) Sriram Navuluri;
- (xx) Derrick C. Nichols;
- (yy) Mason Noble;
- (zz) Kristina Ong;
- (aaa) Na’Kika Perkins;
- (bbb) Erika A. Petersen;
- (ccc) Brittany Presson;
- (ddd) Nathan Redding;
- (eee) Edward Reece;
- (fff) Arthur Rezayev;
- (ggg) Brenda Roberts;

- (hhh) Tyler K. Rose;
- (iii) Christian Rosenbaum;
- (jjj) Kristen Rosenbaum;
- (kkk) Tonya R. Sanders;
- (lll) Jackson Sargent;
- (mmm) Hannah Scimenti;
- (nnn) Carmen Shaw;
- (ooo) Christian Spallino;
- (ppp) Caroline Steele;
- (qqq) Krista J. Stephenson;
- (rrr) Jordan M. Takasugi;
- (sss) Evelyn Tipton;
- (ttt) Marisa D. Tran;
- (uuu) Julien P. Vinas;
- (vvv) Charles Waters;
- (www) Adam S. Watkins;
- (xxx) Derrick Wilkes;
- (yyy) Edward Williams;
- (zzz) Lyrex Williams;
- (aaaa) Kesley M. Winn;
- (bbbb) Leslie Witt;
- (cccc) Susan Zaleski, AKA Susan Norsworthy.

Respectfully submitted,
Laura Hammett, Pro Se
16 Gold Lake Club Road
Conway, Arkansas 72032

CERTIFICATE OF SERVICE

The undersigned certifies that on February 21, 2026, a true and correct copy of the above and foregoing was served upon the Board of Trustees of the University of Arkansas, in their official capacity, by depositing it in the U.S. mail, postage paid, addressed to:

Kelly Eichler Chair of the Board of Trustees of the University of Arkansas
2404 North University Avenue
Little Rock, Arkansas, 72207

With a copy mailed to Co-Plaintiff
Sean Lynn
10 Theresa Drive
North Little Rock, Arkansas 72118



Laura Hammett
16 Gold Lake Club Road
Conway, Arkansas 72032

Undue Influence and Litigation Tactics of the Arkansas Elite

A bunch of doctors who work at UAMS and get paid half a million bucks a year goofed.

Instead of admitting to their mistake, they and their cohorts hid the most damning pages of the medical report from the patient, my son, for about 16 months. They also destroyed all the video evidence of their illegal conduct that was taken by the surveillance cameras in the emergency department and hallways where they battered my son.

The UAMS PD refused to arrest any of the people we allege falsely imprisoned and battered my son. So we filed a suit against the medical personnel, security and police involved and a claim against UAMS. We should win, but the legal system rarely works the way it is supposed to work.

Someone sent me a message yesterday, on the two-year anniversary of my son's release from our two-week ordeal. The message was, drop the lawsuits or never be granted a license to practice law in Arkansas. It was implied, not explicit. Maybe the message was that in retaliation for filing the suit, I will not be granted a license in Arkansas.

I'm 63 years old. I've gotten this far without a license. Those of my readers who watched my story unfold over the last two decades know that threats from misfeasors to harm me further don't usually have the intended effect.

More importantly, the defendants met my son. After he hit his head, the UAMS gang pumped him with fentanyl, lorazepam, diazepam, and a list of other chemical restraints. They withheld all food and water. And still my son did a Houdini out of the four-point restraints the brain surgeons used to bind him, naked, to the \$4,700 per night bed.

He knows how corrupt they are, and still he says, "let's take it to trial."

**December 10,
2025**in **Uncategorized****Leave a comment**

UAMS Doctors Tried to Hide the Evidence

Summary of the Case

This complaint arises from negligence in a medical setting that can be understood by a person of ordinary intelligence using common knowledge. The defendants failed to ask the patient what the mechanism of his injury was, instead relying on an unattributed and erroneous note made by someone who was not a witness to the accident. Based solely on that erroneous statement, the Medical Defendants substituted their judgment for the patient's and refused to allow the patient to contact his family or get a ride home from a professional driver.

The claims that arose during the two weeks immediately after are brought under two alternate theories. The Plaintiffs' preferred theory is that refusal of consent ended the doctor-patient relationship, and the further claims arise out of ordinary tort, contract, and civil rights law. The alternative is that Lynn's claims are subsumed into the medical injury claim, and Hammett's claims fall under tort, contract, and civil rights law, particularly the ADA.

In response to the Plaintiffs' threats of a lawsuit, the Defendants allowed Lynn to leave the hospital on January 27, 2024. Instead of attempting to make the Plaintiffs whole, the Defendants manifested their intent to commit fraud on the court and obstruct justice. They refused to amend the medical record to correct the mechanism of the initial injury and destroyed the videos taken in the emergency room and during Lynn's escape attempts through the hospital halls and stairways.

Let's Get Loud

**November 28,
2025**

ABC Guide to Lawyering

Insurance Company v. ChatGPT

We all know AI hallucinates and doesn't get it right sometimes.

But what about Gallagher Insurance-Risk Management consultant Steve Hillis? Is he hallucinating?

We gave ChatGPT an accurate account of a non-consenting patient's medical condition upon entry to the UAMS hospital, during the two-week false imprisonment, and after being allowed to leave AMA. This is how ChatGPT valued the case, for just the patient, not his mother's claims.

Okay — I'll treat this like a **real valuation memo**, not internet bravado. I'll flag assumptions, give **ranges**, and explain **why a defendant would be scared of this case**.

I'm going to assume:

- State hospital / state actor
- No lawful statutory hold
- Clean plaintiff credibility
- Medical records support what you described (this matters a lot)

**Does UAMS Attorney Hallucinate;
Or Does She Use ChatGPT?
[Redacted for error on 11/1/2025]**

UAMS Lawyer Admits Some Lies; Creates Others

Mrs. Sherri Robinson, the \$160,000 per year public attorney representing UAMS, filed what she called Amended and Substituted Answers to the Requests for Admissions.

I can't make this up. So, with no more ado:

REQUESTS FOR ADMISSIONS

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

Is UAMS Dr. Joseph Margolick on the lam?

LRTR-20-10539: STATE V JOSEPH MARGOLICK

Offenses

Case Summary	Offense	File	Disposition
Case Participants	1 SPEEDING - MORE THAN 15 MPH OVER LIMIT - VOL 21-50-202, 27-00-30201	None	None

Sentences

No Sentences

Docket Entries

File Date	Description	Docket Entry	View	Documents
05/14/2022 @ 11:36AM	PLATONIC CITIZEN SUITS	None	View	None
05/15/2022 @ 11:42AM	FILE A MENSUREMENT SCHEDULE	None	View	None
05/15/2022 @ 11:01AM	FILE ANSWER TO COMPLAINT	None	View	None

What are the chances that there are two or more people named Joseph Margolick in Arkansas, one of whom was cited for speeding more than 15 miles per hour over the limit in Pulaski County and failed to appear for the 2022 arraignment?

A search of Arkansas Court Connect reveals three cases involving the name Joseph Margolick. Two are medical malpractice cases. One is a criminal traffic case.

Standing alone, that proves nothing. Names repeat. Databases are imperfect. Coincidences happen.

But the question becomes more interesting when the lens is narrowed.

What are the chances that there are multiple individuals with the same name in Arkansas, each alleged—separately—to have acted in ways that endangered others, while the systems responsible for accountability appear strikingly disengaged?

In one medical malpractice case, allegations include conduct described as false imprisonment and battery. According to records and correspondence, evidence related to those allegations was submitted to the UAMS Police Department. No meaningful investigation followed. Instead, the department requested that this writer stop sending information.

That response raises a different question altogether.

What are the chances that if the accused individual in a case was poor, unknown, or lacking institutional affiliation, the same level of indifference would apply?

Available information suggests no urgency in executing the warrant issued for Joseph Margolick in 2022 related to a failure to appear.

Again, this is not an identification. It is an observation about systems.

Because when warrants sit unserved, when allegations involving violence are quietly shelved, and when law enforcement discourages the submission of evidence, the issue is no longer about who someone is. It is about what institutions choose to do—or not do.

If accountability pauses whenever professional courtesy enters the room, then the issue is not identity or coincidence—it is selective restraint by the very institutions charged with enforcement.

And that should concern everyone—especially those who believe the law is supposed to work the same way for all.

January 30, 2026

in Uncategorized

Leave a comment

UAMS Benjamin Davis M.D. takes legal advice from “council.”

UAMS doctors, nurses, and other staff are accused of a two-week-long false imprisonment and battery of a man named Sean Lynn, who entered the hospital after a head injury.

Here is what Dr. Benjamin Davis wrote in the medical record on the day Sean Lynn was finally allowed to leave. “I also discussed the case with CMO of the day (and via CMO, hospital council). All of the above concurred that Arkansas has no statute and UAMS has no policy dictating the terms under which a patient may be placed on medical hold. It was made clear to me the police would be no help without a 72 hour psych hold, which, as stated above, was impossible.”

I am not an attorney. “Council” that Dr. Davis referred to is probably legal counsel. It is odd, therefore, that I noticed a statute in Arkansas that dictates **the terms under which a patient may be placed on a medical hold that UAMS “council” does not advise doctors at the university hospital to follow.**

Under Arkansas law, where a patient refuses care and no valid surrogate exists, treatment may proceed only upon a court granting a petition supported by medical certification of necessity. Ark. Code Ann. § 20-9-604.

That law is specifically for when no valid surrogate exists, and I was a valid surrogate that existed at all relevant times; but Dr. Davis and the other medical staff refused to share medical information with me and would not honor the decisions that I told them were their prisoner-patient’s wishes. Because they did not acknowledge a valid surrogate, it is my lay opinion that they should have followed § 20-9-604.


The UAMS staff held Sean Lynn for two weeks by using chemical and physical restraints, and never once applied to a court for certification of medical necessity.

It has been two years and **the alleged criminals have not been arrested**, they have given no restitution and continue to deny that the ordeal ever happened.

Sunday Funday: The Insurance Rep and the Whopper

“...you arrived at UAMS as a trauma level II patient.”

This is just one lie told by **The Doctors Company insurance risk manager, Steve Hillis**. It is the purported reason the UAMS medical providers' insurance company is making the non-consenting patient litigate to be compensated for two weeks of false imprisonment and battery.

Watch on  YouTube

"I don't want to be completely broke, and I don't want to be here for fuckin four days!" – Patient Drugged Against His Will.

University of Arkansas for Medical Sciences, known as UAMS, kept this Traumatic Brain Injury patient for two weeks despite his constant refusal to cooperate and lack of consent.

An FBI agent in the public integrity unit was baffled about why we wanted to report the state hospital doctors for honest services fraud. Unfortunately, many people are as naive as him.

People want to believe medical professionals go into the business for altruistic reasons. Maybe some do. But the Professors of Medicine at UAMS are the highest paid employees in Arkansas.

Here are the salaries of some of the doctors who tried to transfer the unwilling man's assets into the university's coffers: (2023 – 2024 per [Open Checkbook](#))

Dr. Benjamin Davis – \$571,750

Dr. Joseph Margolick – \$506,637

Dr. Mary Kaye Kimbrough – \$539,329

Dr. Kevin Means – \$310,040

Dr. Prashanth Reddy Damalcheruvu – \$584,976

May 30, 2025

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

**SEAN LYNN and
LAURA HAMMETT**

PLAINTIFFS

V.

CASE NO. 60CV-26-216

**BOARD OF TRUSTEES OF THE
UNIVERSITY OF ARKANSAS; et al.**

DEFENDANTS

PROTECTIVE ORDER

Separate Defendant Board of Trustees of the University of Arkansas have moved a protective order, and the Court has granted that motion:

IT IS THEREFORE ORDERED:

1. Scope. All documents and materials produced in the course of discovery of this case, including initial disclosures, responses to discovery requests, all deposition testimony and exhibits, and information derived directly therefrom (hereinafter collectively “documents”), are subject to this Order concerning Confidential Information as set forth below. As there is a presumption in favor of open and public judicial proceedings, this Order will be strictly construed in favor of public disclosure and open proceedings wherever possible.

2. Definition of Confidential Information. As used in this Order, “Confidential Information” is defined as information that the producing party designates in good faith has been previously maintained in a confidential manner and should be protected from disclosure and use outside the litigation because its disclosure and use is restricted by law or there is a reasonable potential that disclosure will cause annoyance, embarrassment, oppression, or undue burden or expense to the producing party. For purposes of this Order, the parties will limit their designation of “Confidential Information” to the following categories of information or documents:

- a. Personal contact information of the parties;

3. Form and Timing of Designation. The producing party may designate documents as containing Confidential Information and therefore subject to protection under this Order by marking or placing the words “CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER” (hereinafter “the marking”) on the document and on all copies in a manner that will not interfere with the legibility of the document. As used in this Order, “copies” includes electronic images, duplicates, extracts, summaries or descriptions that contain the Confidential Information. The marking will be applied prior to or at the time the documents are produced or disclosed. Applying the marking to a document does not mean that the document has any status or protection by statute or otherwise except to the extent and for the purposes of this Order. Copies that are made of any designated documents must also bear the marking, except that indices, electronic databases, or lists of documents that do not contain substantial portions or images of the text of marked documents and do not otherwise disclose the substance of the Confidential Information are not required to be marked. By marking a designated document as confidential the designating attorney and party thereby certify that the document contains Confidential Information as defined in this Order.

4. Inadvertent Failure to Designate. Inadvertent failure to designate any document or material as containing Confidential Information will not constitute a waiver of an otherwise valid claim of confidentiality pursuant to this Order, so long as a claim of confidentiality is asserted within 10 days after discovery of the inadvertent failure.

5. Depositions. Deposition testimony will be deemed confidential only if designated as such when the deposition is taken or within thirty (30) days after receipt of the deposition

transcript. Such designation must be specific as to the portions of the transcript and/or any exhibits to be protected.

6. Protection of Confidential Material.

(a) General Protections. Designated Confidential Information may be used or disclosed solely for purposes of prosecuting or defending this lawsuit, including any appeals.

(b) Who May View Designated Confidential Information. Except with the prior written consent of the designating party or prior order of the court, designated Confidential Information may only be disclosed to the following persons:

(1) The parties to this litigation, including any employees, agents, and representatives of the parties;

(2) Counsel for the parties and employees and agents of counsel;

(3) The court and court personnel, including any special master appointed by the court;

(4) Court reporters, recorders, and videographers engaged for depositions;

(5) Any mediator appointed by the court or jointly selected by the parties;

(6) Any expert witness, outside consultant, or investigator retained specifically in connection with this litigation, but only after such persons have made a written certification acknowledging receipt and review of this Order and agreeing to be bound by its terms;

(7) Independent providers of document reproduction, electronic discovery, or other litigation services retained or employed specifically in connection with this litigation; and

(8) Other persons only upon consent of the producing party and on such conditions as the parties may agree, or pursuant to a court order.

(c) Control of Documents. The parties must take reasonable efforts to prevent unauthorized or inadvertent disclosure of documents designated as containing Confidential Information pursuant to the terms of this Order.

7. Filing of Confidential Information. Any Confidential Information disclosed in any pleading, motion, deposition transcript, brief, exhibit, or other filing with the Court shall be filed under seal and maintained by the Clerk with access restricted to the Court and parties. To the extent such confidential filing is capable of redaction, the redacted version of the document is to be filed on the public docket, with the unredacted version attached as a sealed exhibit to the redacted version. The Clerk will maintain the unredacted version of a confidential filing with access restricted to the Court and parties. The redacted version of confidential filing may include, when necessary, slip sheets appropriately labeled “UNDER SEAL” to indicate the exhibits or other materials that have been omitted in their entirety from the public filing.

8. Challenges to a Confidential Designation. If any party objects to another’s designation of Discovery Materials as confidential, the objecting party shall give counsel for the party making the designation written notice of such objection, stating the reason(s) for the objection. The designating party shall respond in writing within ten (10) days of its receipt. If the parties cannot resolve their dispute, the matter may be brought before the Court using the procedures described in the Arkansas Rules of Civil Procedure or any other order of the Court.

9. Use of Confidential Documents or Information at Hearings. Nothing in this Order will be construed to affect the use of any document, material, or information at any hearing or at trial. A party that intends to present or that anticipates that another party may present Confidential Information at a hearing or at trial must bring that issue to the attention

of the court and the other parties without publicly disclosing the Confidential Information. The Court may thereafter make such orders as are necessary to govern the use of such documents or information at the hearing or trial.

10. Obligations on Conclusion of Litigation.

(a) Order Remains in Effect. Unless otherwise agreed or ordered, all provisions of this Order will remain in effect and continue to be binding after conclusion of the litigation.

(b) Return of Confidential Documents. Upon request by the producing party, within 30 days of the conclusion of this action, Confidential Materials produced by the producing party, as well as all copies, excerpts, or summaries thereof, shall be returned to the producing party, except to the extent that a copy must be retained by counsel to comply with the law, another court order, or mandatory professional obligations, in which case the Confidential Materials will remain subject to this order. In the event counsel possesses attorney work product containing or referring to Confidential Materials, such attorney work product shall remain subject to the restrictions set forth in this order or in the alternative may be destroyed.

11. Order Subject to Modification. This Order is subject to modification by the Court on its own motion or on motion of any party or any other person with standing concerning the subject matter.

12. No Prior Judicial Determination. This Order is entered for the purpose of facilitating discovery. Nothing in this Order will be construed or presented as a judicial determination that any document or material designated as Confidential Information by counsel or the parties is entitled to protection under Ark. Civ. P. 26(c) or otherwise until such time as the Court may rule on a specific document or issue.

13. Persons Bound by Protective Order. This Order will take effect when entered and is binding upon all counsel of record and their law firms, the parties, and persons made subject to this Order by its terms.

14. Jurisdiction. The court will retain jurisdiction to enforce the provisions of this Order after the final disposition of this case.

IT IS SO ORDERED this ____ day of _____, 20____.

Pulaski Circuit Judge

Robinson, Sherri

From: Sean Lynn <seanlynnp@yahoo.com>
Sent: Tuesday, March 10, 2026 2:32 AM
To: Laura Lynn
Cc: Robinson, Sherri
Subject: Re: Proposed Protective Order

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

I agree with Laura

Thank You,
Punkter LC
Seanlynnp.Wordpress.com
Text 213-716-5231

On Mar 9, 2026, at 8:40 PM, Laura Lynn <bohemian_books@yahoo.com> wrote:

Mrs. Robinson,

No, I would not agree to the terms of your proposed protective order. I will propose a protective order for the contact information.

Laura Hammett

On Monday, March 9, 2026 at 06:04:40 PM CDT, Robinson, Sherri <slrobinson@uams.edu> wrote:

Mrs. Hammett - Does that mean that you agree to the terms of the protective order if limited to the contact information?

Mr. Lynn - what is your position on the Board's request?

Sherri Robinson

On Mar 9, 2026, at 5:31 PM, Laura Lynn <bohemian_books@yahoo.com> wrote:

This Message Is From an External Sender

This message came from outside your organization.

Dear Mrs. Robinson,

I will not agree to a protective order like the one you suggest, that takes the burden off the party that wants confidentiality to prove the need for confidentiality for each document or narrowly classified type of document.

It is absurd for the defendants to use the word good faith. They have already committed fraud and destroyed evidence of felonious conduct.

I would agree to keep addresses, telephone numbers and email addresses of the defendants confidential, to the extent they are not already available to the public. We have found several home addresses already and want only to confirm those.

It would be more practical and usual if you would coordinate service of process for defendant employees.

Mr. Lynn already permitted me to post his UAMS medical record on the internet. The providers at UAMS should not be allowed to hide their misconduct by claiming confidentiality.

[Yahoo Mail: Search, Organize, Conquer](#)

On Mon, Mar 9, 2026 at 3:36 PM, Robinson, Sherri
<SLRobinson@uams.edu> wrote:

Good afternoon,

I am writing to you to request your consideration, and hopefully your agreement, with the attached proposed protective order. My immediate focus is the protection of the contact information you have requested in Interrogatory No. 1 sent to UA Board Chair Kelly Eichler. I have drafted the protective order to encompass other anticipated items that may be requested in discovery in this case such as personnel records, medical records, and financial records; however, I am fine if we can just agree on the contact information at this time.

This is my good faith attempt under Rule 26(c) of the Arkansas Rules of Civil Procedure to resolve this without a motion to the court.

I appreciate your consideration.

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|UAMSHealth.com

<image001.png>

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

<image001.png>

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

**SEAN LYNN and
LAURA HAMMETT**

PLAINTIFFS

V.

CASE NO. 60CV-26-216

**BOARD OF TRUSTEES OF THE
UNIVERSITY OF ARKANSAS; et al.**

DEFENDANTS

PROTECTIVE ORDER

The parties have moved for a protective order, and the Court has granted that motion:

IT IS THEREFORE ORDERED:

1. Scope. All documents and materials produced in the course of discovery of this case, including initial disclosures, responses to discovery requests, all deposition testimony and exhibits, and information derived directly therefrom (hereinafter collectively “documents”), are subject to this Order concerning Confidential Information as set forth below. As there is a presumption in favor of open and public judicial proceedings in the federal courts, this Order will be strictly construed in favor of public disclosure and open proceedings wherever possible.

2. Definition of Confidential Information. As used in this Order, “Confidential Information” is defined as information that the producing party designates in good faith has been previously maintained in a confidential manner and should be protected from disclosure and use outside the litigation because its disclosure and use is restricted by law or there is a reasonable potential that disclosure will cause annoyance, embarrassment, oppression, or undue burden or expense to the producing party. For purposes of this Order, the parties will limit their designation of “Confidential Information” to the following categories of information or documents:

- a. Personal contact information of the parties;
- b. Personnel records of current or former employees of the parties;
- c. Personal health information protected by the Health Insurance Portability and Accountability Act (HIPAA), including, but not limited to, any medical records and/or mental health records of the Plaintiffs;
- d. Personal identifying information protected by state or federal law, e.g., social security numbers, dates of birth, etc.; and
- e. Financial records, including but not limited to tax records and financial account information, of the parties.

3. Form and Timing of Designation. The producing party may designate documents as containing Confidential Information and therefore subject to protection under this Order by marking or placing the words “CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER” (hereinafter “the marking”) on the document and on all copies in a manner that will not interfere with the legibility of the document. As used in this Order, “copies” includes electronic images, duplicates, extracts, summaries or descriptions that contain the Confidential Information. The marking will be applied prior to or at the time the documents are produced or disclosed. Applying the marking to a document does not mean that the document has any status or protection by statute or otherwise except to the extent and for the purposes of this Order. Copies that are made of any designated documents must also bear the marking, except that indices, electronic databases, or lists of documents that do not contain substantial portions or images of the text of marked documents and do not otherwise disclose the substance of the Confidential Information are not required to be marked. By marking a

designated document as confidential the designating attorney and party thereby certify that the document contains Confidential Information as defined in this Order.

4. Inadvertent Failure to Designate. Inadvertent failure to designate any document or material as containing Confidential Information will not constitute a waiver of an otherwise valid claim of confidentiality pursuant to this Order, so long as a claim of confidentiality is asserted within 10 days after discovery of the inadvertent failure.

5. Depositions. Deposition testimony will be deemed confidential only if designated as such when the deposition is taken or within thirty (30) days after receipt of the deposition transcript. Such designation must be specific as to the portions of the transcript and/or any exhibits to be protected.

6. Protection of Confidential Material.

(a) General Protections. Designated Confidential Information may be used or disclosed solely for purposes of prosecuting or defending this lawsuit, including any appeals.

(b) Who May View Designated Confidential Information. Except with the prior written consent of the designating party or prior order of the court, designated Confidential Information may only be disclosed to the following persons:

- (1) The parties to this litigation, including any employees, agents, and representatives of the parties;
- (2) Counsel for the parties and employees and agents of counsel;
- (3) The court and court personnel, including any special master appointed by the court;
- (4) Court reporters, recorders, and videographers engaged for depositions;
- (5) Any mediator appointed by the court or jointly selected by the parties;

(6) Any expert witness, outside consultant, or investigator retained specifically in connection with this litigation, but only after such persons have made a written certification acknowledging receipt and review of this Order and agreeing to be bound by its terms;

(7) Independent providers of document reproduction, electronic discovery, or other litigation services retained or employed specifically in connection with this litigation; and

(8) Other persons only upon consent of the producing party and on such conditions as the parties may agree, or pursuant to a court order.

(c) Control of Documents. The parties must take reasonable efforts to prevent unauthorized or inadvertent disclosure of documents designated as containing Confidential Information pursuant to the terms of this Order.

7. Filing of Confidential Information. Any Confidential Information disclosed in any pleading, motion, deposition transcript, brief, exhibit, or other filing with the Court shall be filed under seal and maintained by the Clerk with access restricted to the Court and parties. To the extent such confidential filing is capable of redaction, the redacted version of the document is to be filed on the public docket, with the unredacted version attached as a sealed exhibit to the redacted version. The Clerk will maintain the unredacted version of a confidential filing with access restricted to the Court and parties. The redacted version of confidential filing may include, when necessary, slip sheets appropriately labeled “UNDER SEAL” to indicate the exhibits or other materials that have been omitted in their entirety from the public filing.

8. Challenges to a Confidential Designation. If any party objects to another’s designation of Discovery Materials as confidential, the objecting party shall give counsel for the party making the designation written notice of such objection, stating the reason(s) for the

objection. The designating party shall respond in writing within ten (10) days of its receipt. If the parties cannot resolve their dispute, the matter may be brought before the Court using the procedures described in the Court's final scheduling order in this case.

9. Use of Confidential Documents or Information at Hearings. Nothing in this Order will be construed to affect the use of any document, material, or information at any hearing or at trial. A party that intends to present or that anticipates that another party may present Confidential Information at a hearing or at trial must bring that issue to the attention of the court and the other parties without publicly disclosing the Confidential Information. The Court may thereafter make such orders as are necessary to govern the use of such documents or information at the hearing or trial.

10. Obligations on Conclusion of Litigation.

(a) Order Remains in Effect. Unless otherwise agreed or ordered, all provisions of this Order will remain in effect and continue to be binding after conclusion of the litigation.

(b) Return of Confidential Documents. Upon request by the producing party, within 30 days of the conclusion of this action, Confidential Materials produced by the producing party, as well as all copies, excerpts, or summaries thereof, shall be returned to the producing party, except to the extent that a copy must be retained by counsel to comply with the law, another court order, or mandatory professional obligations, in which case the Confidential Materials will remain subject to this order. In the event counsel possesses attorney work product containing or referring to Confidential Materials, such attorney work product shall remain subject to the restrictions set forth in this order or in the alternative may be destroyed.

11. Order Subject to Modification. This Order is subject to modification by the court on its own motion or on motion of any party or any other person with standing concerning the subject matter.

12. No Prior Judicial Determination. This Order is entered based on the representations and agreements of the parties and for the purpose of facilitating discovery. Nothing in this Order will be construed or presented as a judicial determination that any document or material designated as Confidential Information by counsel or the parties is entitled to protection under Ark. Civ. P. 26(c) or otherwise until such time as the Court may rule on a specific document or issue.

13. Persons Bound by Protective Order. This Order will take effect when entered and is binding upon all counsel of record and their law firms, the parties, and persons made subject to this Order by its terms.

14. Jurisdiction. The court will retain jurisdiction to enforce the provisions of this Order after the final disposition of this case.

IT IS SO ORDERED this ____ day of _____, 20__.

Pulaski Circuit Judge