IN THE CIRCUIT COURT OF PULASKI, ARKANSAS

SEAN LYNN; et al. — PLAINTIFFS

v. Case No. 60CV-26-216

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

Sean Lynn's Response to Joseph F. Margolick's First Set of Requests for Admission

Comes now Pro Se Plaintiff Sean Lynn in response to requests for admission propounded by Defendant Joseph F. Margolick and mailed to Lynn on March 19, 2026:

REQUEST FOR ADMISSION NO. 1: Admit that you do not have testimony from a qualified medical expert to support the allegations of negligence against Dr. Joseph Margolick in your Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO. 1: **Objection**. Irrelevant. I do not need an expert because the asserted negligence lies within the jury's comprehension as a matter of common knowledge. Ark. Code Ann. § 16-114-206(a). Expert testimony is not required when the asserted negligence lies within the comprehension of a jury of laymen, such as a surgeon's failure to sterilize his instruments or to remove a sponge from the incision before closing it. *Mitchell v. Lincoln*, 366 Ark. 592, 598, 237 S.W.3d 455, 460 (2006). I am only questioning Dr. Margolick's decision to force me not to recover from my initial head injury at home without the use of pharmaceuticals.

The law regarding involuntary confinement and non-consensual harmful or offensive contact is easy to understand. There are model jury instructions that are understood by jurors without any expert, other than the judge, explaining the law.

Arkansas law is clear that when a patient seeks release but is held against his will, he must be treated as an involuntary detainee with full due process protections, including a meaningful hearing with clear and convincing evidence. *Von Luce v. Rankin*, 267 Ark. 34, 39, 588 S.W.2d 445, 449 (1979). As in *Von Luce*, I was never afforded any hearing, judicial review, or due process before being confined for 14 days against my expressed wishes to leave.

The need for expert testimony specified in Ark. Code Ann. § 16-114-206(b) does not apply here. Informed consent presupposes that a patient consented to the procedure but may have done so without all information necessary to make a reasoned decision. *Millsap v. Williams*, 2014

Ark. 469, 14, 449 S.W.3d 291, 300. I refused treatment after the first CT Scan and blood test, when I was told there was no need for surgery. My suit is about lackof consent; not informed consent.

A jury can understand that Dr. Margolick did not invoke an emergency exception at any time.

The State has a due process obligation to provide appropriate medical care to persons in its custody, which must look to the intent of the State in its decision to involuntarily medicate the confined person. *Singleton v. Norris*, 338 Ark. 135, 138, 992 S.W.2d 768, 769 (1999). Here, it is easy to understand that chemical restraints were used by Dr. Margolick because I "attempt[ed] to elope when off sedation[.]" Compl. at ¶ 68.

Arkansas courts distinguish between medical negligence requiring specialized knowledge and ordinary negligence involving basic safety measures that laypeople can understand. The destruction of surveillance video evidence, failure to maintain proper security protocols, and allowing unauthorized detention of a competent patient represent institutional safety failures comprehensible to any reasonable jury member. These are not complex medical decisions requiring expert interpretation, but rather basic administrative and security functions that any hospital must perform competently. The systematic destruction of video evidence particularly demonstrates consciousness of wrongdoing and violates fundamental principles of evidence preservation that any layperson can understand. UAMS's own policies required preservation of such evidence because my mother clearly stated that there would be litigation and UAMS counsel was consulted before my release. The deliberate destruction suggests institutional awareness that the recorded conduct was legally problematic. Such ordinary negligence in

hospital administration and security falls outside the specialized medical knowledge requiring expert testimony.

A jury can comprehend as a matter of common knowledge the evidence that indicates that accepting an EMT's unverified statement unattributed to a witness, claiming that I had a death defying 35-foot fall yet still presented with no other indicator for level 1, 2 or 3 activation, was a breach of Dr. Marglick's duty. Compl. at ¶¶ 95, 11-58. Dr. Margolick had access to my medical record and an obligation to read it. Apparently, he did not.

A jury can comprehend as a matter of common knowledge the well settled law that the violation of a safety statute is evidence of negligence. *Bussell v. Missouri Pac. R. Co.*, 237 Ark. 812, 817, 376 S.W.2d 545, 548 (1964). A jury can comprehend, without expert testimony, that it is imprudent to commit a criminal battery and false imprisonment against a man who is already injured.

For example, a person commits battery in the first degree if acting alone or with one or more other persons the person commits or attempts to commit a felony; and in the course of and in furtherance of the felony the person or an accomplice causes serious physical injury to any person under circumstances manifesting extreme indifference to the value of human life or another person who is resisting the felony or flight causes serious physical injury to any person. Ark. Code Ann. § 5-13-201; Compl. at ¶¶ 346-354.

A jury can comprehend as a matter of common knowledge that using physical and chemical restraints to confine a person, me, to a hospital without consent and without a lawful order is the felony of false imprisonment. Ark. Code Ann. § 5-11-103 ("A person commits the offense of false imprisonment in the first degree if, without consent and without lawful authority, the person knowingly restrains another person so as to interfere substantially with the other

person's liberty in a manner that exposes the other person to a substantial risk of serious physical injury."); Compl. at ¶¶ 346-354.

A jury can understand, without expert testimony, that Dr. Margolick committed the crimes of battery and false imprisonment against me. While confining me without consent and without a lawful order, he ordered staff under his supervision and control to drug and bind me. A jury can understand that committing these crimes was negligence per se, allowing for an inference of negligence.

A jury can understand that because the medical record contains no petition or physician certification under Ark. Code Ann. § 20-9-604—and no psychiatric hold petition—there was no legal authority to hold me. Compl. at ¶¶ 57, 58, 107-114.

Regardless of which party has the burden of proof, a jury can understand that an emergency exception did not apply, without any testimony from an expert. Arkansas law establishes that medical treatment without consent constitutes battery, but provides a narrow emergency exception. See *Millsap*, 2014 Ark. 469. Under Ark. Code Ann. § 20-9-603:

> "Emergency" means a situation in which, in competent medical judgment, the proposed surgical or medical treatment or procedures are immediately or imminently necessary and any delay occasioned by an attempt to obtain a consent would reasonably be expected to jeopardize the life, health, or safety of the person affected or would reasonably be expected to result in disfigurement or impaired faculties.

The emergency exception operates under a conjunctive two-pronged test established in *Millsap*: "Consent is not required when an emergency exists AND there is no one immediately available who can provide consent for the patient." *Millsap*, 2014 Ark. 469 at 13, 449 S.W.3d at 299. Both conditions must be satisfied for the exception to apply, meaning the plaintiff can defeat the emergency doctrine by disproving either prong. Here, I was of sound mind when I initially refused treatment, subsequent intoxication was caused by the medical providers' battery, and my

mother was available to inform the defendants that I did not want treatment by the defendants. Further, it was clear to all but the most cognitively impaired individuals that I wanted to leave and I had reason and the right to leave.

A jury can understand the reasonable inference from the spoliation of surveillance video and the enforcement by Dr. Margolick of the prohibition against my mom video recording. Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation; and it has long been the rule that spoliators should not benefit from their wrongdoing. *Kelsay v. Wise*, No. CA98-1487, 1999 WL 1203724, at *3 (Ark. Ct. App. Dec. 8, 1999).

A jury can comprehend, using a small amount of common knowledge, that damage is caused by being forced to use the drugs Dr. Margolick forced me to use.

For example, courts find that mental anguish, an affront to personality, indignity, disgrace, humiliation and mortification to which the victim is subjected by battery is compensable. *Browder v. Gahr*, 258 Ark. 992, 996–97, 530 S.W.2d 359, 362 (1975).

A jury can comprehend that each defendant, owing me a duty, who failed to act to release me from imprisonment is a proximate cause of the damages I sustained from the time the bad actor should have tried to release me. Dr. Margolick is particularly liable. He was an assistant professor collecting $506,637 per year salary. Yet he signed off on the imprisonment and battery committed on January 17, 2024 and recorded at 8:53 a.m. by a resident, Landon Arensberg, over four days later, January 21, 2024 at 5:31 p.m.[1]

Notwithstanding the objection, I am not paying an expert to testify.

[1] Dr. Arensberg was not named as a defendant. This was inadvertent.

REQUEST FOR ADMISSION NO. 2: Admit that you do not have testimony from a qualified medical expert willing to testify that Dr. Joseph Margolick failed to meet the applicable standard of care in his medical care and treatment of Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 2: **Objection**. Irrelevant. I do not need an expert because the standard of care that I assert Dr. Margolick failed to meet lies within the jury's comprehension as a matter of common knowledge.

A jury can understand that the majority of doctors in Arkansas studied or did a residency at UAMS. UAMS set the standard in Arkansas, as dismal as it is. Dr. Margolick violated almost every one of the patient rights defined by UAMS, including the right to refuse treatment and to leave UAMS against the advice of the health care providers, to the extent permitted by law. Compl. at ¶ 93.

UAMS admitted on the record generated by UAMS staff: "Arkansas has no law (and UAMS, no policy) that covers so-called 'medical holds,' which means that the ability to hold a patient who wants to leave AMA can only happen in a very limited set of conditions where the team can show a significant risk of imminent harm could befall the incapacitated patient should they leave the hospital." Compl. at ¶ 94. It does not take a brain surgeon to explain that Dr. Margolick violated this standard.

A procedure performed without a valid consent would be outside the standard of care. *Haupt v. Kumar*, 103 Ark. App. 298, 300, 288 S.W.3d 704, 706 (2008).

Dr. margolick did not document a medical emergency. It is easy to understand the triage report, initial test results and the words Dr. Bruce wrote at about 10 p.m. on the first night of the confinement: "Suspect his exam will get worse - ICU for close monitoring[.]" Compl. at ¶¶ 55,

56. Suspicion is not imminent need that would allow Dr. Margolick to vary from the standard of care of allowing me bodily autonomy.

A jury will also understand that every drugging and procedure that Dr. Margolick subjected me to after my right to leave UAMS Medical Center was violated was harmful or offensive.

The need for expert testimony specified in Ark. Code Ann. § 16-114-206(b) does not apply here. Informed consent presupposes that a patient consented to the procedure but may have done so without all information necessary to make a reasoned decision. *Millsap v. Williams*, 2014 Ark. 469, 14, 449 S.W.3d 291, 300.

A jury can understand the reasonable inference from the spoliation of surveillance video and the enforcement of Dr. Margolick of the prohibition on my mom video recording. Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation; and it has long been the rule that spoliators should not benefit from their wrongdoing. *Kelsay*, No. CA98-1487, 1999 WL 1203724, at *3 (Ark. Ct. App. Dec. 8, 1999).

Notwithstanding the objection, I am not paying an expert to testify.

REQUEST FOR ADMISSION NO. 3: Admit that you do not have testimony from a qualified medical expert that there was an act or omission on the part of Dr. Joseph Margolick that was a proximate cause of injury or damage to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 3: **Objection**. Irrelevant. I do not need an expert because the fact there was an act or omission on the part of Dr. Joseph Margolick that was

a proximate cause of injury or damage to Sean Lynn lies within the jury's comprehension as a matter of common knowledge.

Advertisements for the drugs Dr. Margolick forced into me are required to be written comprehensible to an ordinary person. They include side effects, warnings, precautions, and contraindications of the drugs. 21 C.F.R. § 202.1. I intend to read the warnings from each drug Dr. Margolick forced into me to the jury. I am not an expert and I understand those labels. So will the jury.

The jury can easily comprehend that there was foreseeable harm and injury to a person who wants to go to sleep in his own bed, to be bound in one position for days at a time, woken as often as captors torture their prisoners, starved, dehydrated and humiliated, instead. I accused Dr. Margolick of this conduct.

For example, courts find that mental anguish, an affront to personality, indignity, disgrace, humiliation and mortification to which the victim is subjected by battery is compensable. *Browder*, 258 Ark. at 996–97, 530 S.W.2d at 362. No expert is required to show that it was foreseeable that being battered at Dr. Margolick's direction was reasonably certain to cause the mental anguish, affront to personality, indignity, disgrace, humiliation and mortification that it caused me.

A jury can comprehend using common knowledge that it was foreseeable that forced dehydration, starvation, lack of uninterrupted sleep, administration of a pharmacology of controlled substances and being bound in one position for days at a time would foreseeably cause injury and damage. The same jury can easily understand that my claim that because Dr. Joseph Margolick was a supervising assistant professor at the time of the false imprisonment and battery,

he did not discourage those working under him from continuing with the false imprisonment and battery, and he "ordered" the conduct, that he was a proximate cause of the injury and damage.

A jury can comprehend using common knowledge that the numbers on the blood tests recorded by the defendants started in healthy range and got much worse, then within four days of leaving against medical advice, my blood was in the healthy range again. For example, my Sodium on the first test taken January 13, 2024 was 139 mmol/L. On January 21, 2024, Dr. Margolick wrote "Euvolemic hyponatremia." He was referring to a test taken under his purported supervision on January 17, 2024. My sodium level had fallen to 128 mmol/L. I am not an expert, but I understand that 128 mmol/L is not healthy, because it is printed in a red font with an asterisk. The dictionary definition of "euvolemic hyponatremia (sic)" is easy to understand. "Euvolemic" means relating to or having the normal volume of blood or fluids in the body. https://www.dictionary.com/browse/euvolemic?q=Euvolemic. "Hyponatraemia" means water intoxication, a condition in which there is a low concentration of sodium in the blood. https://www.dictionary.com/browse/hyponatraemia.

Because Dr. Margolick supervised my electrolyte intake, forbid me from eating the foods I would eat at home, and forced me to intake a plethora of pharmaceuticals, each with its list of side effects, it is easy to understand, even with a simple mind, that Dr. Margolick was the proximate cause of my euvolemic hyponatremia.

It was foreseeable that I would be traumatized by being falsely imprisoned and battered as that is a natural consequence of defendant Margolick's conduct. *Missouri Pac. R. Co. v. Yancey*, 178 Ark. 147, 10 S.W.2d 22, 24 (1928).

Notwithstanding the objection, I am not paying an expert to testify.

REQUEST FOR ADMISSION NO. 4: Admit that Dr. Joseph Margolick was not negligent in any way in connection with the care and treatment provided to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 4: **Objection**. This request should not be considered because it is legal in nature. The firm representing Dr. Margolick knows this request is impermissible. Wright, Lindsey and Jennings LLP represented Baptist Health and Dr. Patrick O'Connell in a medical malpractice case in 2013. The firm propounded, "*REQUEST FOR ADMISSION NO. 4:* Admit that Baptist was not negligent in the care and treatment of Vernon Hardesty." *Hardesty v. Baptist Health*, 2013 Ark. App. 731, 3, 431 S.W.3d 327, 330. The circuit court did not consider Baptist's fourth request, finding that it was legal in nature. *Hardesty*, 2013 Ark. App. at 4, 431 S.W.3d at 330. The same request was made on behalf of Dr. O'Connell and the lower court did not invalidate that request, erroneously, but not prejudiciously. Id. at 5, 431 S.W.3d at 331.

Objection. This is an improper request for admission because Dr. Margolick knows or should know that I would not admit this; it is I direct contradiction to my complaint. The purpose of requests for admission is to decrease the costs of litigation by narrowing the issues. It is not meant to be a tool to cause busy work for a pro se litigant in the hopes that the litigant fails to respond timely.

> The request for admissions within our discovery procedure is intended to eliminate the effort, expense and time involved in proving such facts as are admitted and is not intended as some new or modern legal method of winning law suits without trial. The object of the civil court trial still remains to attain justice between the parties as nearly as possible, and the rules of civil procedure, including discovery, are intended to aid in that object.

Widmer v. Fort Smith Vehicle & Mach. Corp., 244 Ark. 626, 632, 427 S.W.2d 186, 190 (1968).

Notwithstanding my objections, I deny the request.

REQUEST FOR ADMISSION NO. 5: Admit that Dr. Joseph Margolick did not fail to meet the applicable standard of care in his medical care and treatment of Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 5: **Denied.** A procedure performed without a valid consent would be outside the standard of care. *Haupt*, 103 Ark. App. at 300, 288 S.W.3d at 706.

The majority of doctors in Arkansas studied or did a residency at UAMS. UAMS set the standard in Arkansas, as dismal as it is. Dr. Margolick violated almost every one of the patient rights defined by UAMS, including the right to refuse treatment and to leave UAMS against the advice of the health care providers, to the extent permitted by law. Compl. at ¶¶ 91, 92.

UAMS admitted on the record generated by UAMS staff: "Arkansas has no law (and UAMS, no policy) that covers so-called 'medical holds,' which means that the ability to hold a patient who wants to leave AMA can only happen in a very limited set of conditions where the team can show a significant risk of imminent harm could befall the incapacitated patient should they leave the hospital." Compl. at ¶ 94. Dr. Margolick violated this standard.

Dr. Margolick did not document a medical emergency. The triage report, initial test results and the words Dr Bruce wrote at about 10 p.m. on the first night of the confinement: "Suspect his exam will get worse - ICU for close monitoring[.]" Compl. at ¶¶ 55, 56. Suspicion is not imminent need that would allow Dr. Margolick to vary from the standard of care.

None of the drugs or procedures done to me from January 13, 2024 to January 27, 2024 by Dr. Margolick, ordered by Dr. Margolick or allowed by Dr. Margolick in his supervising role was to address an imminent danger from the initial traumatic brain injury I sustained when I jumped 10 feet from a falling ladder.

Further, the single criteria used to define me as a trauma level 2 was erroneous, unattributed and unverified. Compl. at ¶¶ 315, 316. UAMS counsel noted in discovery at the Claims Commission that my mother said that being unscathed as I was after falling 35 feet was a "miracle." Dr. Margolick failed to inform my mother that my agitated and intoxicated behavior was caused solely by a purported fall from a three-story height and denied the administration of intoxicating drugs. Compl. at ¶ 382.

REQUEST FOR ADMISSION NO. 6: Admit that there was no act or omission by Dr. Joseph Margolick that was the proximate cause of injury or damage to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 6: **Objection**. This request should not be considered because it is legal in nature. The firm representing Dr. Margolick knows this request is impermissible. Wright, Lindsey and Jennings LLP represented Baptist Health and Dr. Patrick O'Connell in a medical malpractice case in 2013. The firm propounded, "*REQUEST FOR ADMISSION NO. 5:* Admit that any actions or inactions on the part of Dr. Patrick O'Connell were not the proximate cause of any damages or injuries alleged in your complaint." *Hardesty*, 2013 Ark. App. at 3, 431 S.W.3d at 330. The circuit court did not consider Dr. O'Connell's fifth request, finding that it was legal in nature. *Hardesty*, 2013 Ark. App. at 4, 5, 431 S.W.3d at 330, 331.

Notwithstanding my objection, I **deny** that no act or omission by Dr. Joseph Margolick was the proximate cause of injury or damage to me.

REQUEST FOR ADMISSION NO. 7: Admit that Dr. Joseph Margolick complied with the standard of care required of him in the medical care and treatment provided to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 7: **Objection**. Dr. Margolick asked substantially the same request for admission No. 5, "Admit that Dr. Joseph Margolick did not fail to meet the applicable standard of care in his medical care and treatment of Sean Lynn." The only difference is using "complied with" in place of "did not fail to meet the applicable[.]" Dr. Margolick and the other defendants already stole two weeks of my life and I will probably die sooner than if I had been allowed to heal properly in my home after jumping 10 feet from a falling ladder. Stop asking the same questions over and over.

Notwithstanding the objection, **Denied**. A procedure performed without a valid consent would be outside the standard of care. *Haupt, 103 Ark. App. at 300, 288 S.W.3d at 706.*

The majority of doctors in Arkansas studied or did a residency at UAMS. UAMS set the standard in Arkansas, as dismal as it is. Dr. Margolick violated almost every one of the patient rights defined by UAMS, including the right to refuse treatment and to leave UAMS against the advice of the health care providers, to the extent permitted by law. Compl. at ¶¶ 91, 92.

UAMS admitted on the record generated by UAMS staff: "Arkansas has no law (and UAMS, no policy) that covers so-called 'medical holds,' which means that the ability to hold a patient who wants to leave AMA can only happen in a very limited set of conditions where the

team can show a significant risk of imminent harm could befall the incapacitated patient should they leave the hospital." Compl. at ¶ 94. Dr. Margolick violated this standard.

Dr. Margolick did not document a medical emergency. The triage report, initial test results and the words Dr. Bruce wrote at about 10 p.m. on the first night of the confinement: "Suspect his exam will get worse - ICU for close monitoring[.]" Compl. at ¶¶ 55, 56. Suspicion is not imminent need that would allow Dr. Margolick to vary from the standard of care.

None of the drugs or procedures done to me from January 13, 2024 to January 27, 2024 by Dr. Margolick, ordered by Dr. Margolick or allowed by Dr. Margolick in his supervising role was to address an imminent danger from the initial traumatic brain injury I sustained when I jumped 10 feet from a falling ladder.

Further, the consent form written on behalf of UAMS acknowledges that there is a need to specify that permission is granted for care to be provided by students, residents and trainees. I did not knowingly sign a consent form. Dr. Margolick violated the standard of care by allowing students, residents and trainees to make decisions and impose those decisions on me.

REQUEST FOR ADMISSION NO. 8: Admit that Dr. Joseph Margolick is not liable in any way to you.

RESPONSE TO REQUEST FOR ADMISSION NO. 8: **Objection**. As the firm representing Dr. Margolick knows from its defense of Dr. O'Connell, a request for admission of a purely legal matter is impermissible. A request for admission that asks a party to admit that a person is not liable is also legal in nature, as it pertains to a legal conclusion rather than a factual matter.

Where are no facts mentioned in the request, it cannot be called an "application of facts to law." *Matter of Adoption of Dailey*, 30 Ark. App. 8, 11, 784 S.W.2d 782, 783 (1989).

Not withstanding the objection, I **deny** that "Dr. Joseph Margolick is not liable in any way to" me.

REQUEST FOR ADMISSION NO. 9: Admit that you do not have a reasonable cause affidavit against Dr. Joseph Margolick from a qualified expert as required by Ark. Code Ann. § 16-114-209(b).

RESPONSE TO REQUEST FOR ADMISSION NO. 9: **Objection**. Irrelevant. It is also unclear as to what the affidavit would address.

Ark. Code Ann. § 16-114-209(b) was ruled as unconstitutional, because the legislature was infringing on the court's ability to make rules concerning procedural law. See *Summerville v. Thrower*, 369 Ark. 231, 253 S.W.3d 415 (2007). The court concluded that § 16–114–209(b) is procedural and turned to its asserted conflict with Rule 3. *Summerville*, 369 Ark. at 238, 253 S.W.3d at 420. The Arkansas Constitution is clear that rules of pleading, practice, and procedures for our courts fall within the domain of the Arkansas Supreme Court. Ark. Const. amend. 80, § 3. *Summerville*, 369 Ark. at 238, 253 S.W.3d at 420.

Further, before being deemed unconstitutional, the statute would not be applicable to this case. It begins, "In all cases where expert testimony is required under § 16-114-206[.]" § 16-114-209(b). I am not required to have expert testimony because the issues addressed by my claims are within the comprehension of a jury of my peers. § 16-114-206. I understood that I was falsely imprisoned by Dr. Margolick, even after hitting my head on the ground, then being forced to use

drugs that I have an adverse reaction to and that were meant to make me lose consciousness and wipe out my memory. Dr. Margolick was not allowed to bind me naked to a cot, starve me, refuse to let me drink water, drug me, catheterize me, force me to defacte in a bedpan and have men wipe my anus, nor disrupt the tiny bones in my left ear. The fact that Dr. Margolick acted like he did not to know that he was violating my rights was malicious. A lack of an expert writing an affidavit does not render this fact incomprehensible to a juror.

REQUEST FOR ADMISSION NO. 10: Admit that you have no evidentiary support for the allegations made in your Complaint against Dr. Joseph Margolick.

RESPONSE TO REQUEST FOR ADMISSION NO. 10: **Denied**.

REQUEST FOR ADMISSION NO. 11: Admit you have no evidentiary support for the damages claimed in your Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO. 11: **Denied**.

REQUEST FOR ADMISSION NO. 12: Admit Sean Lynn's injuries and damages as alleged in the Complaint were due to his pre-existing medical conditions and not a result of the medical care and treatment he received from Defendants.

RESPONSE TO REQUEST FOR ADMISSION NO. 12: **Denied**.

I, Sean Lynn, declare under penalty of perjury under the laws of the State of Arkansas that the foregoing Responses to Requests for Admission are true and correct to the best of my knowledge, information, and belief.

3-29-26

Sean Lynn, in pro se
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(213) 716-5231
SeanLynnP@yahoo.com

Date

Certificate of Service

I, Sean Lynn, hereby certify that all other parties who have appeared are represented by persons who are registered users of the Arkansas Judiciary Electronic Filing System, which shall send notification to all registered parties or their legal representatives in this matter upon the clerk inputting my filing, which is effective electronic service. Further, on or within one business day of the date of filing, I will serve a copy by email to each appearing party's representative.

3-29-26

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Date