

IN THE CIRCUIT COURT OF PULASKI, ARKANSAS

SEAN LYNN; and
LAURA HAMMETT

PLAINTIFFS

v.

Case No. 60CV-26-216

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

DEFENDANTS

RESPONSE TO MOTION FOR PROTECTIVE ORDER

Comes now Plaintiffs Sean Lynn and Laura Hammett and for their response in opposition to the Board of Trustees of the University of Arkansas's motion for a protective order ("Motion") state:

1. The plaintiffs ask the court to deny the motion and rely on protections already put in place by the legislature and the Arkansas Supreme Court.
2. The Board's motion seeks to block routine discovery necessary for Plaintiffs to pursue their claims arising from Plaintiff Lynn's involuntary hospitalization and ensuing non-consensual, harmful or offensive contact. Further, the Board implies that the court should deny the public and the plaintiffs' First Amendment protections of open discourse on matters of public concern.
3. Hammett filed an ex parte motion for extension of time to file this response so the plaintiffs could file a joint response with the full measure of time for Lynn to participate. On April 8, 2026, at 5:16 p.m., the clerk of this Court informed Hammett verbally by telephone that

the proposed order for extension of time was approved. Relying on that communication, this opposition is filed timely.

4. In direct response to averments in the Motion, the Board did not make the required “good faith” effort to meet and confer. *Motion*, at ¶ 7 and *Board Ex. D*, at p. 1.

5. The Board did not include any reason in its two short emails that comprised its entire effort to meet and confer, that support enhancing the protections offered by Arkansas Supreme Court Administrative Order No. 19, Administrative Order No. 21, Ark. R. Civ. P. 26(c), or applicable federal law governing medical privacy under HIPAA, all of which already provide defined and adequate safeguards for sensitive information. *Board Ex. D*, at p. 1-3.

6. Hammett offered to write a protective order that would protect dissemination of “defendants” contact information “to the extent they are not already available to the public.” *Id.* at p. 2. There was no further communication from the Board until its Motion was filed. *Id.* at p. 1-3.

7. The Board’s Motion raises arguments that were never presented during the meet and confer process. The Board never mentioned “harassing and abusive conduct” in the meet and confer emails. *Id.* The Board did not mention motions to dismiss numerous separate defendants. *Id.* There was no indication that Margolick accepted service of summons as valid. *Id.* The Board did not reply to plaintiffs’ request for General Counsel to coordinate service of process for defendant employees. *Id.* at p. 2.

8. Given the Board’s position attacking plaintiffs’ free speech, the plaintiffs no longer agree to negotiate any expansion of confidentiality protections beyond those already afforded to defendants. Ambushing the plaintiffs as the Board did is not acting in good faith.

9. Moving to its brief, the Board failed to cite authority for its conclusory statement of law, that Hammett harassed and abused individuals, UAMS, counsel for the Board and UAMS, as well as “multiple” representatives of A.J. Gallagher. *See Motion*, at ¶ 3; *See Def’s Brief in Support* (“BIS”), at p. 2, 3.

10. The purportedly harassing and abusive conduct the Board specified was limited to complaining about sometimes incomplete blog posts, that even with the supporting proof of truth cut out by the Board, still are not defamatory. *Motion*, at ¶¶ 3, 8(b), *Board Ex. D*. Plaintiffs have attached the full version of truncated blog posts that show that Hammett’s writing is protected speech under the First Amendment of the United States Constitution. *Pls.’ Ex. 1-3*).

11. The Board wrote what looks vaguely like a motion to dismiss on behalf of numerous separate defendants. *Motion*, at ¶ 4; *BIS*, at p. 4-7. Counsel for the Board and UAMS has not entered an appearance on behalf of any of the other defendants and specified that she is “Attorney for Separate Defendant, Board of Trustees of the University of Arkansas” on her certifications. *Motion*, at p. 3; *BIS*, at p. 9. Plaintiffs request a ruling from the court about whether this is a general appearance for each named defendant, and if it is, to extend the time to respond to their motions to dismiss for 10 days plus weekends and holidays for the plaintiffs.

12. The Board claimed that Hammett “is not entitled to the information for Dr. Joseph Margolick” and should not contact the represented defendant directly because he is represented by counsel. *Motion*, ¶ 5. The Board added in its brief that the court should deny Hammett’s request altogether, not just make the information confidential, because defendant Margolick has already been served with a summons. *BIS*, at p. 7. Instead of offering any authority for its decree, the Board wrote that this “should be easily understood by Hammett[.]” *Id.*

13. As counsel for the Board and UAMS has repeatedly reminded Hammett, the Claims Commission and this Court, Hammett is not an attorney. Hammett is not acting in a role as an attorney nor as a non-lawyer assistant. Lynn is not an attorney nor a law student. Pro se litigants are allowed and encouraged to try to settle their differences directly with opposing parties, which helps litigants on both sides to save money.

14. Furthermore, an address for a defendant is useful for more than to perfect service of summons. These persons, even if dismissed before service of summons, will be called as witnesses at the trial. A home address can also help identify a person, such as Defendant Susan Zaleski, who appears to have changed her name to Susan Norsworthy, by comparing the new name found on public tax records or similar to the address to which UAMS was sending paychecks. There are also defendants who the USPS was unable to serve, such as Dr. Joseph P. Deloach. Plaintiffs should be able to publish the last known address of those defendants to try to find information about whether the person moved or is simply dodging service. *Pls. ' Ex. 4.*

15. Even if the court decides that the addresses should be withheld or confidential, the proposed order is overreaching and sets a bad precedence. The protective order presented as Board Exhibit C is the edge of the slippery slope on which the Board, an arm of the State, hopes to suppress all exposure of its unlawful practices.

16. The grounds for this opposition are more fully set forth in the brief in support.

Respectfully Submitted, this 13th day of April, 2026,



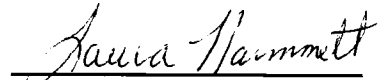
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Certificate of Service

I, Laura Hammett, hereby certify that on April 13, 2026, I entered for filing 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 will deliver the file stamped copy by email to Sean Lynn, who joined this opposition, at SeanLynnP@yahoo.com within one business day of acceptance for filing.



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