

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

**REPLY TO PLAINTIFFS' RESPONSE TO
MOTION FOR PROTECTIVE ORDER
ON BEHALF OF SEPARATE DEFENDANT
BOARD OF TRUSTEES OF THE UNIVERSITY OF ARKANSAS**

Plaintiff Hammett has quickly shown in the more than 90 days since she filed the Complaint in this matter on behalf of herself and her son that she is not concerned with the Court's rules or the professional standards on the practice of law. Beginning with her filing against the University of Arkansas for Medical Sciences (UAMS) in the Arkansas State Claims Commission, Hammett has insisted that it is her interpretation of the rules that governs discovery and any disputes. She wants only to bully people into agreeing with her version of the "facts" without even allowing those at whom she points fingers to conduct discovery. She files motions and sends emails seeking to grossly expand her rights beyond what the law allows, but she responds to motions and emails from the attorneys for defendants seeking to limit Defendants' access to information to what she believes it should be and under the rules she sets forth. In short, Hammett has no real idea of how to litigate her claims and those of her son, but she is adept at filing pleadings or sending emails to harass, annoy and make unreasonable demands on others.

With regard to the Board's motion for a protective order, Hammett argues that the disclosure of defendant's contact information is "standard." For support, she

uses interrogatories propounded to her by a separate defendant through his attorney. Crucially, the Board is not aware of any blog in which the separate defendant, or his attorney, publicly posts information regarding lawsuits or the identities and harassing information toward those against whom they are engaged in litigation. Instead, separate defendant and his counsel are professionals operating under the rules rather than battling through name calling and baseless personal attacks.

Hammett also attacks Board counsel's attempt to meet and confer by arguing that the Board did not provide her with the full arguments it intended to raise if a motion for protective order was required. That Hammett wishes to argue in every communication she has does not mean that the Board, any other defendant or attorney, is obligated to do so in return. Counsel for the Board made the inquiry of a protective order and proposed a draft. In response, Hammett stated, "I will not agree to a protective order like the one you suggest It is absurd for the defendants to use the word good faith. They have already committed fraud and destroyed evidence of felonious conduct." (Motion for Protective Order, Exhibit D, p. 2). While Hammett's comments do not invite productive dialogue, Board counsel followed up to ask if Hammett would agree to a protective order that limited the contact information, and she responded, "No, I would not agree to the terms of your proposed protective order. I will propose a protective order for the contact information." (Id., p. 1).

Rather than continue to engage in futile discussions with Hammett, the Board waited 16 days for a proposed protective order that never came. Because Hammett did not follow through with sending a proposed protective order, the Board filed the

current motion before the Court which includes all of the Board's arguments for consideration. Hammett has already shown several times in her Claims Commission filings and before this Court that she does not intend to cooperate with counsel's requests since she has already deemed the alleged conduct of UAMS and its employees as criminal and counsel's requests as absurd. It is unreasonable for Hammett to expect that Board counsel, or any licensed attorney, to participate in the back-and-forth arguments that she suggests.

The Board, through its motion, has requested a simple protective order that does not limit Hammett's access to the contact information she requests, if it is available, but rather requires her to operate in a professional manner in the same way that licensed attorneys operate. That the 81 individually sued defendants have chosen to enter the medical profession or work at UAMS does not make them public figures. Neither Hammett, nor her son should he begin to actively participate in the litigation, are entitled to post the contact information for the defendants online or share it with others outside of this litigation process. The Board's request is not unreasonable, and the requested protective order is the type commonly agreed upon by licensed attorneys in active litigation.

The Board stands behind the arguments raised in its Motion for Protective Order and Brief in Support filed on March 25, 2026. Should the Court agree that Hammett is entitled to the information she seeks, the Board requests that the Court enter the protective order requested by the Board and instruct Hammett to engage with the attorneys in a professional manner going forward.

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

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CERTIFICATE OF SERVICE

I, Sherri L. Robinson, hereby certify that on April 20, 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 emailed and mailed a copy by U.S. Mail, postage prepaid to both Plaintiffs:

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