

IN THE CIRCUIT COURT OF PULASKI, ARKANSAS

SEAN LYNN; and

PLAINTIFFS

LAURA HAMMETT

v.

Case No. 60CV-26-216

BOARD OF TRUSTEES of the UNIVERSITY

DEFENDANTS

of ARKANSAS, in their official capacity;

et al.

PLAINTIFF SEAN LYNN'S RESPONSES TO DEFENDANT JOSEPH F. MARGOLICK,
MD'S FIRST INTERROGATORIES TO PLAINTIFF SEAN LYNN

Plaintiff Sean Lynn responds pursuant to Rule 33 of the Arkansas Rules of Civil Procedure:

INTERROGATORY NO. 1: Please state your full name, your date of birth, your place of birth
and your Social Security number.

INTERROGATORY NO. 1: Objection. My social security number is irrelevant. Asking for it
is meant to harass and violate my privacy further.

Objection. Duplicative. You know who I am and my birthday because you controlled my
wallet and it is in the record you helped to create.

While reserving my objections, my name is Sean Patrick Lynn and my birthdate is June 24, 1990.

INTERROGATORY NO. 2: Please list in chronological order your home address for the last ten years, including the dates you each lived at each address and all persons with whom you lived at each address.

INTERROGATORY NO. 2:

Objection. This interrogatory is vague and ambiguous as to the phrase “the dates you each lived” and the scope of “all persons with whom you lived,” and therefore cannot be answered with reasonable certainty as written. Also ambiguous as to what time period “lived” refers to.

Objection. This interrogatory is overly broad and unduly burdensome in seeking a ten-year history of all persons with whom Plaintiff resided, including third parties whose privacy rights are implicated.

Objection. Compound as to conjunctive regarding where I and others lived and whom lived with me and others.

Objection. Duplicative. You already know my address and my address on January 13, 2024. Your cohorts did not go to my house o try to find my family on January 13, 2024. You ar wasting my time and bothering me.

Subject to and without waiving these objections, I am providing permanent residential addresses for myself since buying my first owned property in North Little Rock about seven years ago.

418 Sierra madre Drive, NLR, AR. Purchased, improved and moved in about 2018.
Moved out about March 2025.

10 Theresa Dr., NLR, AR.. About March 2025 to present.

INTERROGATORY NO. 3: Please state whether you have ever been married. If so, please state the name of any spouse, the date of marriage, the date of divorce or death and the county and state in which the divorce or death occurred, if applicable, and the current name and address of each spouse.

INTERROGATORY NO. 3:

Objection. Compound as inquiring into my marriage(s) and the residential history of any spouse(s).

Objection. Irrelevant, except as to the status of my relationship to Lisette Reyes, to whom I was never married.

Subject to and without waiving these objections, I was married once. I filed for divorce in 2014.

INTERROGATORY NO. 4: Please state whether you have any children, and provide the names, dates of birth, address and the mother and/or father's name of each child.

INTERROGATORY NO. 4:

Objection. Irrelevant, other than to C.L., unless the imprisonment at UAMS results in a wrongful death. Laura Lynn Hammett will have an attorney contact you with my statutory beneficiaries information at that time.

Objection. Unduly intrusive and harassing.

Objection. Compound, vague and ambiguous as to the phrase “provide the names, dates of birth, address and the mother and/or father’s name of each child.”

Subject to and without waiving these objections, I am the father to C.L. who was under 12 years old at the time of my imprisonment and not allowed to be with me. My other children don’t live nearby.

INTERROGATORY NO. 5: Please state the names, addresses, and telephone numbers of all relatives you have in Pulaski County, Arkansas.

INTERROGATORY NO. 5:

Objection. This interrogatory seeks information that is not relevant to any claim or defense and improperly invades the privacy of third parties.

Objection. Vague. You did not say how many degrees of separation.

Objection. Irrelevant and random.

Objection. Vague as to the phrase “Lives in Pulaski County” and the meaning of relative.

Subject to and without waiving these objections, C.L. is in Pulaski County. My mom Laura Lynn Hammett is in Pulaski County often. My dad is in Pulaski County sometimes. My mom’s husband is in Pulaski County about every day.

INTERROGATORY NO. 6: State the names, addresses and telephone numbers of all persons who know anything about the alleged incidents giving rise to this lawsuit.

INTERROGATORY NO. 6: Objection. Overbroad and burdensome. There are hundreds of downloads per day on my mom’s website where she posts court docs. And my mom talks to anyone who will listen about it. She has gone to several prosecutors, law enforcement, news agencies, attorneys.

Objection. Attorney-client privilege and work product privilege.

Objection: the defendant knows the names and contact information for the majority of witness4es better than I do; and the Board of Trustees and UAMS refuse to give that information to me. Ask them.

INTERROGATORY NO. 7: Please state whether you have ever been a party to a lawsuit, whether domestic, civil, criminal, and/or an administrative proceeding. If so, please state for each:

- (a) the names of all parties;
- (b) the court in which the suit is (was) pending;
- (c) the case number;
- (d) the attorneys representing you and the defendants;
- (e) the underlying basis for the lawsuit; and
- (f) the final resolution of the lawsuit.

INTERROGATORY NO. 7: Objection. Overbroad, burdensome and meant to harass.

Objection. Compound.

Objection. Irrelevant.

Objection. Your attorneys can find my entire legal history in the State of Arkansas by going on court connect.

Subject to and without waiving these objections, I have no court cases filed in any other state during the last ten years.

INTERROGATORY NO. 8: If you have ever sought relief for any chapter of bankruptcy, state for each case:

- (a) the names of all parties;
- (b) the court in which the suit is (was) pending;

- (c) the case number;
- (d) the attorney representing you; and
- (e) the final resolution.

INTERROGATORY NO. 8: I have never filed for bankruptcy.

INTERROGATORY NO. 9: Have you ever been charged, convicted or pled guilty or no contest to a violation of any criminal or civil statute or regulation? If your answer is yes, please state for each:

- (a) the complete style of the case, including court and case number;
- (b) the name and address of the attorney, governmental official or entity alleging the violation;
- (c) the date the action was filed;
- (d) the date of the resolution;
- (e) if settled or verdict returned, the full amount and complete terms of the settlement or of the penalties/fines/sentence awarded; and
- (f) a complete description of the circumstances alleged to have occurred upon which the action was based.

INTERROGATORY NO. 9: Objection. Meant to harass.

Subject to and without waiving these objections, I was not charged, convicted, nor pled guilty, nor pled no contest to a violation of any criminal or civil statute or regulation between January 13, 2024 and January 27, 2024, inclusive, but I was physically and chemically restrained and held prisoner by you and your cohorts during that entire period.

INTERROGATORY NO. 10: Please state your current occupation and the length of time engaged at same, and provide the name, address and telephone number of your employers for the past ten years.

INTERROGATORY NO. 10: Objection. Burdensome.

Objection. Irrelevant. I am not asking for lost wages.

INTERROGATORY NO. 11: Please list your educational background to include names of school attended, dates of attendance, dates of graduations and degrees obtained.

INTERROGATORY NO. 11: Collecting information as soon as I am in Arkansas. My resume is in some of my books. College of the Canyons two AA degrees.

INTERROGATORY NO. 12: Identify the name, address, and telephone number of all medical care providers, including physicians and hospitals, who examined or provided care and treatment to you during the ten years prior to the allegations of the subject litigation and all medical care providers who have provided treatment to you thereafter.

INTERROGATORY NO. 12: Objection. Duplicative. The same interrogatory was asked and fully answered to that point at the Claims Commission.

Objection. Compound.

Subject to and without waiving these objections, In the ten years before being forced to stay at UAMS, I went to approximately two doctors or nurses. Once for a COVID vaccine so I could work, and once for antibiotics. My mom Laura Lynn Hammett is willing to meet with you at an office in Little Rock or Conway to show you all the records she collected of my care after leaving UAMS. They are also available as a public record in the Claims Commission. The records are not on a data base, but you can make a FOIA request and use this document to show that I intended to file my responses to interrogatories as an open public record.

INTERROGATORY NO. 13: For each hospitalization you have had, please state:

- (a) the name and address of each hospital;
- (b) the dates of admission and discharge;
- (c) the identity of the physician who admitted you;
- (d) the reason for admittance;
- (e) the identity of all physicians who treated you;
- (f) a description of the treatment received;
- (g) the diagnosis made; and
- (h) the prognosis given.

INTERROGATORY NO. 13: Objection. Vague as to time. If you mean over my entire life, please ask my mother Laura Lynn Hammett. She knows more than I do.

Objection. Impracticable. Any hospitalization I had prior to January 13, 2024 was more than 10 years ago and I would have more trouble than you finding the records.

Subject to and without waiving these objections, my mother Laura Lynn Hammett told you or your cohorts about my hospitalization when I had my fingertip severed. It was not in the medical record you and your cohorts created.

INTERROGATORY NO. 14: Please state the name, address and telephone number of all pharmacies or prescriptive services you have utilized for ten years prior to the allegations of the subject litigation and thereafter.

INTERROGATORY NO. 14: Objection. Duplicative. The same interrogatory was asked and fully answered to that point at the Claims Commission.

Objection. Compound.

Subject to and without waiving these objections, In the ten years before being forced to stay at UAMS, I used prescription drugs twice. Once COVID vaccine so I could work, and once antibiotics. My mom Laura Lynn Hammett is willing to meet with you at an office in Little Rock or Conway to show you all the records she collected of my care after leaving UAMS. They are also available as a public record in the Claims Commission. The records are not on a data base, but you can make a FOIA request and use this document to show that I intended to file my responses to interrogatories as an open public record.

INTERROGATORY NO. 15: If at any time you suffered from any chronic or permanent adverse health condition, state what condition you have had and names and addresses of medical care providers who treated you for that condition.

INTERROGATORY NO. 15: Objection. Overbroad as it sounds like you want my entire life's history to include mental and physical health and situational or organic.

Objection. Compound and ambiguous as to the phrase "chronic or permanent adverse health condition."

Subject to and without waiving these objections, I have never had an oscillator chain disrupted until I was in UAMS. I've had an especially traumatic life, but the experience at UAMS was the most traumatic thing that ever happened to me.

INTERROGATORY NO. 16: Please identify all hobbies and forms of recreation in which you participated prior to January 13, 2024 which you can no longer participate as a result of the allegations contained in your complaint.

INTERROGATORY NO. 16: Objection. Irrelevant. Everything I did before is less enjoyable now.

Subject to and without waiving these objections, prior to January 13, 2024 I enjoyed hearing people talk. Now everybody mumbles and I have to read lips.

I enjoyed living with my daughter and her mother, my girlfriend of about 11 years. My girlfriend moved out of my house on February 1, 2025. It is hard to know how things would be different if I had been able to heal comfortably at home and not lost my hearing.

I used to enjoy working. It is hard to know if my lack of job offers has risen dramatically because of my hearing loss or because of a bad economy. I stay busy though.

I had just written my first chapters in a book my mom wrote with me before January 13, 2024.

My mom did not change a word of what I wrote and she said it was perfect. I crank books out now, but my mom says they need to be edited and she is too busy to do it.

INTERROGATORY NO. 17: State all social clubs, lodges, churches or associations of any nature in which you participate or have been a member for the past five years.

INTERROGATORY NO. 17: Objection. Intrusive beyond the needs of discovery.

Objection. My mother told you and your cohorts my religion and her religion while I was in UAMS and it was not included in your medical records. It is annoying that you are feigning a lack of knowledge now.

Subject to and without waiving these objections, collecting information when I return to Arkansas. I go to Catholic church and occasionally other sects of Christianity.

INTERROGATORY NO. 18: Please state whether either of you created any entry on any form of social media relating to the events described in the complaint. If the answer is in the affirmative, please state the date, time, substance of each entry, and form of social media,

including your user name on which such entries were made. If you have altered or deleted any posts related to the subject matter contained in your complaint either prior to or after filing of your complaint, please identify the date, time and content of the alteration or deletion and the reason for doing so. Please confirm that you will not alter or delete any posts concerning the subject matter of your complaint until the conclusion of this lawsuit.

INTERROGATORY NO. 18: Objection. Compound.

Objection. Ambiguous as to the phrase “either of you.”

Objection. Burdensome. You are asking me to write tens of thousands of pages. You can watch my YouTube channel, @peckerwood23.

I do not have multiple personality disorder.

Subject to and without waiving these objections, my mother is willing to share my social media with you during an office meeting. She is collecting any relevant to the issues in our complaint. I use Facebook, Instagram and YouTube.

INTERROGATORY NO. 19: Please identify any form of social media websites or applications, including but not limited to, Facebook, Linked In, Twitter, Instagram or similar sites, for which you have an account, and provide your user domain name(s) for each account.

INTERROGATORY NO. 19:

Objection, intrusive and meant to harass. My mother is willing to meet in an office in Pulaski or Faulkner County to let you see and request copies of my social media. My YouTube channel is public. @peckerwood23.

INTERROGATORY NO. 20: Please identify each insurance company or plan that at any time has provided or been obligated to provide you with medical, health, disability and/or

compensation coverage. Include the company name, address, telephone number, policy or identification number, and policy period.

INTERROGATORY NO. 20: Objection. Duplicative. General Counsel for UAMS, Sherri Robinson already collected that information. It is easier for your employer to supply it than it is for me.

INTERROGATORY NO. 21: Please identify in detail any statements that defendants or any employee or representative of defendants, in matters arising out of the same transaction or occurrence alleged in the Complaint, has made relating to the subject matter of the Complaint, including but not limited to any statement that you believe qualifies as a statement against interest, present sense impression, and/or an excited utterance with regard to any of your contentions in this case.

INTERROGATORY NO. 21: Objection. Ambiguous and potentially Burdensome and unduly broad. "Any" can mean to choose one, or it may be understood to mean "all." Writing every word spoken and written by all defendants and employees or representatives of defendants has said, which also wrongly assumes I know everything everyone has communicated would take well over 30 days of full time work.

Objection. Compound.

Objection. UAMS refused to produce communications made through UAMS email, Workday and all other platforms used by defendants and defendants representatives and employees.

UAMS deleted the surveillance videos it made of the transaction or occurrence. I could read lips fairly well now and could have told you what defendants and defendants representatives and employees were saying when they chased me through hallways and tackled me.

Objection. Defendants and defendants representatives and employees drugged me with drugs that they know to cause memory loss. (Britney Beumeler said this during a recorded conversation with my mother.) And defendants and defendants representatives and employees forbid my mother from taking video recordings of the transaction and occurrence. I assume the things my mother says were said are true.

Subject to and without waiving these objections, read the book I published, ABC guide to Lawyering (Life Is A Freeroll Series Book 26), the letters written by your insurance company representatives, especially Steve Hillis and see the discovery responses in the related claims commission case, which are public documents and in the possession of the defendants and defendants representatives and employees.

Examples include General Counsel Sherri Robinson exclaiming that because the videos defendants made were destroyed that it would be their word against mine. Also the admitting representative my mom videoed saying the ordeal was “tragic” and that UAMS was not allowed to hold me. Also, Nurse Susan Zaleski (now Norsworthy) saying that UAMS does not give “benzos” to TBIs. And an unidentified clinician saying that UAMS never gives opioids to TBIs. Also, Dr. Elizabeth Brown on January 27, 2024, two hours before I was finally released, saying I was on a 72-hour hold.

INTERROGATORY NO. 22: Please state whether you claim or contend that any individual has made any statement or statements with reference to your care and treatment, to the alleged occurrences giving rise to this lawsuit, or to any of the matters alleged in your complaint. If so, please state the names, addresses, and telephone numbers of the persons claimed to have made

the statements, the substance of the statements, when made, where made, to whom made, and in whose presence made.

INTERROGATORY NO. 22: Objection. Unduly broad and burdensome.

Objection. Harassing and annoying.

Objection. Compound.

Objection. Asked and answered in part and posted to forums that are publicly available, including but not limited to the claims commission.

INTERROGATORY NO. 23: State the name, address, occupation, and qualifications of each person you intend to call as an expert witness at the trial of this case.

INTERROGATORY NO. 23: None.

INTERROGATORY NO. 24: With respect to each expert identified, please state the following:

- a. his or her professional specialty;
- b. the subject matter on which he or she is expected to testify;
- c. the opinions to which he or she will testify at trial;
- d. the facts upon which each opinion set forth in subparagraph (c) is based;
- e. whether or not such expert has submitted a written report or opinion related to the subject matter of the case;
- f. identify the documents and any other material relied upon by and/or provided to each such expert for review;
- g. the amount of the expert's fee;
- h. the hourly rate charged by the expert in litigation matters;

- i. the total amount of income earned during the preceding year from testifying or consulting with attorneys in litigation matters;
- j. the number of cases the expert has testified (at trial or in deposition) on behalf of plaintiffs in general;
- k. the total number of cases the expert has testified (at trial or in deposition behalf of defendants in general; and
- l. a list of all other cases in which the witness has testified as an expert at trial or by deposition within the past four years. Each case should be identified by style, court in which it was filed, docket number, and the name, address and telephone number of the attorney retaining the expert's services.

INTERROGATORY NO. 24: Not applicable.

INTERROGATORY NO. 25: Does there exist, either written or oral, any understanding, agreement, or contract, including, but not limited to, guaranty agreements, loan receipts, Mary Carter agreements, releases, quasi-releases, compromise or settlement agreements, hold harmless agreements, covenants not to sue, covenants not to execute, indemnity or contribution agreements, high/low agreements or the like, between you and any person or entity with regard to any potential liability, directly or indirectly, that any such person or entity might have had or might in the future have, which liability is based in whole or in part, directly or indirectly, on the occurrences made the basis of this lawsuit? If your answer is yes, state verbatim the contents of such understanding, agreement or contract including, but not limited to: the parties thereto, the terms thereof, and the date on which such agreement was reached. If you will do so without a formal request for production, attach all documents that relate to or reflect the understanding,

agreement, or contract referred to in this interrogatory, if any such documents exist. If you will not attach the documents or if you do not have a copy of them, identify the documents.

INTERROGATORY NO. 25: Objection. Compound.

Subject to and without waiving this objection, there is no agreement between me and any person or entity with regard to any potential liability, directly or indirectly, that any such person or entity might have had or might in the future have, which liability is based in whole or in part, directly or indirectly, on the occurrences made the basis of this lawsuit.

INTERROGATORY NO. 26: State the name, complete address, and current business and residence telephone numbers of all lay witnesses who may testify on your behalf at the trial of this case, stating the substance of each fact to which such person is expected to testify.

INTERROGATORY NO. 26: Objection. Overbroad and burdensome.

Objection. The vast majority of our witnesses are defendants. The contact information and substance of what each will say is easier for you to ascertain than it is for me. UAMS refused to supply the contact information to me.

Subject to and without waiving these objections, I am still collecting witness identities.

INTERROGATORY NO. 27: Please identify any and all exhibits and demonstrative aids that will be offered or used at trial.

INTERROGATORY NO. 27: Objection. It is impossible to answer this question yet. Discovery is ongoing. Thus far, UAMS has not produced documents responsive to our discovery requests at the claims commission, other than the medical record generated April 29, 2025.

Subject to and without waiving these objections, I will use all the videos my mother took and posted on YouTube channel @StopBigBusinessBillionaires, the four versions of the medical

record produced by UAMS, responses to discovery requests at the claims commission, the documents filed in this case and the claims commission case, my medical records from before and after the forced hospitalization, documents filed in Sullivan v. Margolick (or any other case against Dr. Margolick) and still collecting.

INTERROGATORY NO. 28: Please state whether you or anyone on your behalf has maintained any written or audio notes, diaries, calendar entries, or the like, which in any way pertain to the allegations in this case.

INTERROGATORY NO. 28: Objection. Overbroad as to the phrase “in any way pertain to[.]” Subject to and without waiving these objections, yes.

INTERROGATORY NO. 29: Please set forth an itemized list of all medical, hospital, physician, prescription drug and related expenses that you are claiming as damages in this lawsuit. Include in your answer the name and address of the charging entity, the amount of the expense, the reason for the expense, and whether you or any insurance company or medical care payor has paid that expense.

INTERROGATORY NO. 29: Objection. Asked and answered at the claims commission and that documentation is a public record.

Subject to and without waiving these objections, the compilation can be found in the public record of my responses to interrogatories at the claims commission and in my book, ABC guide to Lawyering (Life Is A Freeroll Series Book 26).

INTERROGATORY NO. 30: Because you are claiming permanent injury as an element of damage in this lawsuit, please list any physician or medical care provider who has diagnosed a

permanent injury, describe in detail what each physician has concluded and provide the names and addresses of the physicians who manage care for the identified permanent injury(ies).

INTERROGATORY NO. 30: Objection. Asked and answered at the claims commission and that documentation is a public record.

Subject to and without waiving these objections, the compilation can be found in the public record at the claims commission and in my book, ABC guide to Lawyering (Life Is A Freeroll Series Book 26).

INTERROGATORY NO. 31: Please describe what you allege are any physical or psychological injury(ies), resulting from treatment or services rendered by defendants including in your description:

- (a) the identity of any treating or examining physician supporting this diagnosis;
- (b) the date and place of any such treatment or examination;
- (c) the duration of any treatment received for said injury(ies);
- (d) any prognosis or diagnosis concerning such injury(ies);
- (e) the identity of each person rendering any such diagnosis or prognosis; and
- (f) whether the injury is permanent.

INTERROGATORY NO. 31: Objection. Asked and answered at the claims commission and that documentation is a public record.

Objection. Compound.

Objection. The defendants did not provide treatment and services after the initial CT Scan when I asked to leave and refused treatment and services. The alleged injuries are from battery and false imprisonment and the threat of robbing me.

Subject to and without waiving these objections, a compilation can be found in my book, ABC guide to Lawyering (Life Is A Freeroll Series Book 26).

INTERROGATORY NO. 32: Please state in accordance with Ark. Code Ann. § 16-114-205(b) the total amount of damages, including actual, special, and punitive damages, that you claim in this case, including but not limited to the nature of each element, the amount of money sought for each element of damage, all bases for your computation of each element of damage, all payments you have made to or received from any source in connection with each of these elements of damage, and all medical treatment you have sought or received to alleviate each element of damage (including but not limited to each person from whom you have sought or received such treatment).

INTERROGATORY NO. 32: Objection. Asked and answered at the claims commission and that documentation is a public record.

Objection. Compound.

Objection. Treatment is ongoing and it is impossible to know what future damages will be. When I asked to leave UAMS emergency department on January 13, 2024 at approximately 5:30 p.m., I had an 80% chance of recovery from the non-hospital acquired traumatic brain injury. Because of the imprisonment and battery by the defendants, I have a 100% chance of suffering from Post Traumatic Epilepsy. Epileptic seizures thus far have caused me to crack my head open, bite my

tongue which made eating or drinking painful for a week, and have side effects of the prophylactic, brand name Keppra.

Subject to and without waiving these objections, general damages for pain and suffering, humiliation, loss of time and loss of enjoyment of life, \$7,000,000; Punitive damages \$21,000,000 where allowed for intentional torts and if I add a claim for 42 USC 1983 or any statutory law that shifts costs and fees; out of pocket expenses for medical treatments that is approximately \$3,000 and counting; Costs of litigation, including service of summons, filing fees, mileage to file, and any other costs as proved.

INTERROGATORY NO. 33: If you are claiming past or future loss of income, please identify the amount of such loss and the name, address, and telephone number of the person or entity that would have paid the income. Please list how long you were employed by each employer.

INTERROGATORY NO. 33: I am not asking for loss of income.

INTERROGATORY NO. 34: Have you ever filed a worker's compensation claim? If so, please state the jurisdiction in which you filed the claim, the year in which you filed the claims, and the name of the employer and/or employer's worker's compensation carrier against whom you filed the claim.

INTERROGATORY NO. 34: Objection. Compound.

Objection. Ambiguous as to the character chain "and/or".

Subject to and without waiving these objections, I filed a worker's comp claim in 2024.

According to documents my mother collected, it was an Arkansas claim against Vertigo insurance on behalf of "Punket LC" and was denied.

INTERROGATORY NO. 35: Has you ever served in the military? If so, please state the branch of the military in which you served and your dates of service.

INTERROGATORY NO. 35: No. I have not served in the military.

INTERROGATORY NO. 36: Please provide the following information:

a. Full name as set forth on Social Security Card, Medicare Card and/or Medicaid Card;

b. Whether you ever applied for or received benefits from Medicare, Medicaid or the Social Security Administration at any time. If so, please identify the specific entity(ies); the date(s) on which you applied for said benefits; the date(s) you first received benefits from said entity(ies); and any claim number associated with your receipt of benefits.

INTERROGATORY NO. 36: Objection. Compound.

Objection. Ambiguous as to the character chain “and/or”.

Objection. UAMS has the information about Medicaid. UAMS billed Medicaid for both the initial exam in the emergency department and all the charges for drugs, procedures and confinement that was unnecessary, addressed hospital acquired conditions, and was refused.

Subject to and without waiving these objections, I do not qualify for social security disability because I have significant assets (which the defendants wanted to transfer to themselves).

INTERROGATORY NO. 37: Do you have any existing Medicare or Medicaid lien for treatment of any physical or mental injury which you allege to have been proximately caused by the incident which is the subject of this lawsuit? If so, identify all applicable liens, the amount of the liens and the associated healthcare providers from whom you sought treatment.

INTERROGATORY NO. 37: Objection. I do not understand the question. Ambiguous as to time and who the lien favors.

Subject to and without waiving these objections, I don't have any current liens against Medicare or Medicaid. I am not aware of any current liens Medicare or Medicaid has against me.

INTERROGATORY NO. 38: Are you disabled or receiving disability benefits from a private or other group health plan? Please explain.

INTERROGATORY NO. 38: Objection. Compound.

Objection. Ambiguous. I do not understand if you are asking about the benefits my health insurance pays for me to receive medical treatment for my disabilities.

Subject to and without waiving these objections, I am disabled. I have significant, non-curable hearing loss. I have mild aphasia. I have post traumatic epilepsy. My mom keeps telling me to go to a therapist.

INTERROGATORY NO. 39: If you ever received Medicare and/or Medicaid benefits, please provide the following information:

a. Please identify any and all amounts that have been paid by Medicare and/or Medicaid in satisfaction of medical expenses from any health care provider involved in the treatment of your injuries you are claiming in this lawsuit and for each amount, please indicate the health care provider, date of service, and service provided;

b. Please outline the steps you or your representative(s) have taken to notify Medicare/Medicaid of this lawsuit;

c. Please provide the dates on which you or your representative(s) mailed written correspondence to Medicare/Medicaid or specifically any Medicare/Medicaid secondary payer contractor (MSPRC) regarding its lien;

d. Please provide the dates on which you or your representative(s) communicated orally with Medicare and/or Medicaid or specifically any Medicare and/or Medicaid secondary payer contractor (MSPRC) regarding its lien;

e. Please outline what documents, if any, you or your representatives have received from Medicare/Medicaid including any secondary payer contractors regarding a lien;

f. Please provide the name, address and telephone number for the Medicare Coordinator or Benefit Contractor handling your claim; or

g. Please provide the name, address and telephone number for the Medicare Secondary Payment Recovery Contractor (MSPRC) Representative handling your claim.

INTERROGATORY NO. 39: Objection. Compound.

Objection. Because of my disabilities, my mom collected all my medical records. She might know the answers. But she does not want to be threatened with charges of unauthorized practice of law, so she will not answer for me here.

Objection. Asked, in part, and answered.

Objection. Ambiguous as to the character chain “and/or”.

UAMS has the information about Medicaid. UAMS billed Medicaid for both the initial exam in the emergency department and all the charges for drugs, procedures and confinement that was unnecessary, addressed hospital acquired conditions, and was refused.

INTERROGATORY NO. 40: Have any photographs, audiotapes, or videotapes been taken or made related to any matters pertaining to the subject of this lawsuit? If so, please state when these photographs, audiotapes, and/or videotapes were taken, the person taking them, and state the name of the present custodian of the photographs, audiotapes, and/or videotapes.

INTERROGATORY NO. 40: Objection. Over broad and outside my knowledge. I do not know which of the defendants made videos of me while I was bound naked to the hospital cot or any other time during the unlawful confinement. I do not know everyone who made audio or videotapes related to the subject of this lawsuit after I was released from UAMS on January 27, 2024.

Objection. I do not know everyone, everywhere who has made recordings of or about the ordeal.

Subject to and without waiving these objections, UAMS or its employees made video recordings of me and the defendants in the emergency department on January 13, 2024 and in the hallways and stairways until January 27, 2024. I do not know who has custody of those videos. General Counsel Sherri Robinson certified that all videos taken by or on behalf of UAMS were destroyed.

My mom took videos during the calmer times during the imprisonment and accidentally once when I was pleading to be released from the restraints and allowed to use a toilet. She also made recordings after I was released. The videos taken in the hospital and some of the ones taken after are part of the public record of the claims commission case. Almost all her recordings can be viewed by the public at YouTube channel @StopBigBusinessBillionaires.

INTERROGATORY NO. 41: Did you or any member of your family ever communicate with defendants or any employee or representative thereof, by phone call (home or cell), text message, email or any other form of electronic communication (whether written or recorded), or any other form of written communication? If your answer is “yes”, please state the date, approximate time, parties involved, method and description of the communication.

INTERROGATORY NO. 41: Objection. Compound.

Objection. Ambiguous. There is no indication of how many levels of relatives the defendant is asking me to discuss.

Objection. Overbroad and burdensome. I don't know what every member of my family has done. There are 82 defendants and ten of those are not identified by name. There are many employees and representatives thereof who were not named as defendants. A matrix of possible communications would have potentially thousands of entries.

Objection. This information is equally available to the defendants.

Subject to and without waiving these objections, you might want to ask my relatives what they did or wrote. My writings are available on the internet, in the claims commission public record and emails between me and defendants or any employee or representative thereof are available from the defendants or any employee or representative thereof.

INTERROGATORY NO. 42: Please identify, by name and address, any party holding a contingency interest in the outcome of this litigation including, but not limited to, Medicare, Medicaid disability insurers, governmental entities, medical providers, treatment facilities or clinics, litigation finance companies, banks, and any other entities or individuals who expect to be reimbursed in part or in full by the plaintiffs from any settlement or award obtained by the plaintiffs in this case. This interrogatory specifically excludes identification of any arrangement with counsel, should one exist.

INTERROGATORY NO. 42: I am not aware of any contingency interest in the outcome of this litigation. I do not know how insurance works; health insurance has paid for a significant portion of my medical expenses. My mom said she would contact my insurance and ask if they need to

be reimbursed out of litigation proceeds. If they do, I will ask for the award to include those costs.

INTERROGATORY NO. 43: Please state all persons who drafted or assisted in drafting your responses to Defendant Joseph F. Margolick MD's (a) First Set of Interrogatories, (b) First Set of Requests for Production, and (c) First Set of Requests for Admission and identify which discovery responses were drafted by whom.

INTERROGATORY NO. 43:

Objection. This interrogatory seeks information protected by the work-product doctrine.

Objection. This interrogatory seeks information that is not reasonably calculated to lead to admissible evidence.

Objection. Ambiguous as to the phrase "assisted in drafting".

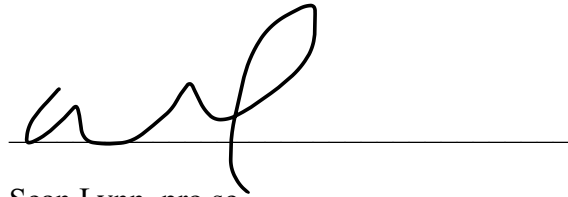
INTERROGATORY NO. 44: Please consider these interrogatories and requests as continuing and supplement your answers in the event new or additional information comes to the attention of you or your attorney in order to avoid the possibility of surprise to defendants at the trial of this case. Will you do so?

INTERROGATORY NO. 44: Objection. This interrogatory improperly seeks a legal conclusion regarding Plaintiff's obligations under the Arkansas Rules of Civil Procedure.

Subject to and without waiving these objections, to the extent required by law.

I declare under penalty of perjury of the laws of Arkansas and the United States that the foregoing answers are true to the best of my knowledge and belief. The answers made subject to and without waiving my objections will be augmented after the objectionable wording of the interrogatories is eliminated or corrected.

Signed this 20th day of April, 2026



Sean Lynn, pro se
Mailing address:
c/o Laura Hammett
16 Gold Lake Rd.
Conway, Arkansas 72032
SeanLynnP@yahoo.com

CERTIFICATE OF SERVICE

On April 20, 2026, a copy of the foregoing was served on the following as indicated below:

Glenn S. Ritter – Via Email WRIGHT, LINDSEY & JENNINGS LLP 3333 Pinnacle Hills Parkway, Suite 510 Rogers, Arkansas 72758-8960 (479) 986-0888 FAX: (479) 986-8932 E-MAIL: gritter@wlj.com	Laura Lynn Hammett, Pro Se – <i>Via Email</i> 16 Gold Lake Club Road Conway, AR 72032 bohemian_books@yahoo.com <i>Pro se Plaintiff</i>
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<p>Sherril L. Robinson – <i>Via Email</i></p> <p>SLRobinson@uams.edu</p> <p><i>Sr. Associate General Counsel</i></p> <p><i>UAMS</i></p>	
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Sean Lynn, Pro Se
Mailing address:
c/o Laura Hammett
16 Gold Lake Rd.
Conway, Arkansas 72032
SeanLynnP@yahoo.com