

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 TO DISMISS SEAN LYNN'S COMPLAINT
ON BEHALF OF SEPARATE DEFENDANT NATHAN ERNST**

Comes now Separate Defendant, Nathan Ernst, by and through the undersigned counsel, and for his Motion to Dismiss, states:

1. Nathan Ernst is one of 81 individuals named in a lawsuit purportedly filed by Sean Lynn and his mother Laura Hammett.
2. As a state employee, Ernst is immune from suit under Article 5, § 20 of the Arkansas Constitution and Arkansas Code Annotated § 19-10-305.
3. Additionally, Ernst has only been served with a complaint from Hammett; thus, service and process are lacking, and due process requirements have not been fulfilled by Lynn.
4. Finally, Lynn relies on conclusory allegations as to the group of defendants rather than providing fact specific allegations to state a claim for relief against Ernst.
5. The grounds for this motion are more fully set forth in a brief in support.
6. Under Rule 10(c) of the Arkansas Rules of Civil Procedure, Ernst also adopts and incorporates by reference the arguments raised in the following filings by other defendants:

- a. Motion to Dismiss on Behalf of Separate Defendant Board of Trustees of the University of Arkansas and Brief in Support, filed on March 2, 2026.
- b. Motion to Dismiss Claims Brought by Plaintiff Sean Lynn on Behalf of Separate Defendant Karrar Aljiboori, M.D. and Brief in Support, filed on April 22, 2026.

WHEREFORE, Separate Defendant, Nathan Ernst, respectfully requests that the Complaint be dismissed as to him and for all other relief to which he is entitled.

Respectfully submitted,

THE BOARD OF TRUSTEES OF
THE UNIVERSITY OF ARKANSAS,
for and on behalf of Separate Defendant,
Nathan Ernst

BY: /s/ Sherri L. Robinson
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Attorney for Separate Defendant,
Nathan Ernst

CERTIFICATE OF SERVICE

I, Sherri L. Robinson, hereby certify that on April 30, 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:

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/s/ Sherri L. Robinson _____
Sherri L. Robinson