

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

Errata of Laura Hammett's Response to Shannon Cobb's Motion to Dismiss

Comes now Pro Se Plaintiffs Laura Hammett and Sean Lynn in response to Separate Defendant Shannon Cobb's motion to dismiss and state:

[The plaintiffs did not add three days to time allowed to respond and in haste to serve timely did not make all the appropriate changes to names, pronouns and name of drug or actions that constituted battery on Lynn and Fraud and Outrage on Hammett by Shannon Cobb (Section II(A), (E)). Those corrections are made hereunder.]

1. Sean Lynn and Laura Hammett filed a joint complaint against Shannon Cobb and 80 other individuals on January 7, 2026. Lynn is joining in this opposition to prevent any adverse issue preclusion for his own claims.

2. Cobb, named only in her individual capacity, committed gross negligence, intentional and criminal¹ conduct against Lynn and acted with reckless disregard for the truth rising to malice, and knew or should have known the situation she caused would be deeply disturbing to Hammett, therefore Cobb is not immune from suit under Article 5, § 20 of the Arkansas Constitution, “Arkansas Code Annotated § 19-10-305” or § 25-44-305, that was formerly cited as § 19-10-305.

3. Hammett stated enough specific fact allegations against Cobb individually to state a claim upon which relief can be granted. Also, where “clinician defendants” were referred to in allegations, Cobb was on notice that the allegations were directed at her, as well as each other clinician defendant.

4. Hammett intends to amend her claims to include unjust enrichment and add several lengthy exhibits to the complaint after serving the shorter, but sufficient complaint to all defendants. In case the Court finds that the original complaint is not specific enough, Hammett requests leave to amend.

5. The grounds for this opposition are more fully set out in the brief in support.

6. Cobb purportedly adopted and incorporated by reference the arguments raised in the following filings by other defendants, “[u]nder Rule 10(c): Buemeler’s Brief in Support of Motion to Dismiss, filed April 22, 2026.

¹ Civil Action by Crime Victim, Ark. Code Ann. § 16-118-107 (2011).

7. “Statements in a pleading may be adopted by reference” in “any motion.” Ark. R. Civ. P. 10(c). Cobb conflated “pleading” to mean that other “motions” are allowed to be adopted by reference. A motion is not a pleading. Ark. R. Civ. P. 7(a).

Wherefore, the plaintiffs request the Court deny Separate Defendant Shannon Cobb’s motion to dismiss claims made by Hammett or grant plaintiffs leave to amend no more than 30 days after plaintiffs’ anticipated renewed motion for an extension of time to serve summonses is decided.

Respectfully submitted,



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May 17, 2026

Date

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May 17, 2026

Certificate of Service

I, Laura Hammett, hereby certify that on May 17, 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 all attorneys in this matter. I also served a copy by email of the unstamped copy to each attorney by email. I also will deliver a copy of the file stamped copy by email to Plaintiff Sean Lynn at SeanLynnP@yahoo.com.

/s/ Laura Hammett

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