

**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

**Brief in support of motion for an extension of time to serve summonses**

**I. The Court may grant an extension of time to serve summonses for good cause.**

The Court may, for good cause, extend the time for service of a summons. Ark. R. Civ. P. 4(i).

Whether to grant an extension of time is a fact-intensive determination committed to the Court's discretion. *See Logan Centers, Inc. v. Walker*, 2015 Ark. App. 687, at 2–3 (applying abuse-of-discretion standard under Ark. R. Civ. P. 6(b)); *Layman v. Bone*, 333 Ark. 121, 967 S.W.2d 561 (1998).

To establish good cause, a plaintiff must demonstrate diligent efforts to perfect service with specificity. *See Hawkins-Luckett v. Crossett Health Found.*, 2024 Ark. App. 539, 701 S.W.3d 781.

This Court has previously exercised its discretion to grant extensions of time for service upon a showing of good cause. *See, e.g., Velocity Investments LLC v. Belden Allen*, Case No. 60CV-25-4422 (Aug. 29, 2025).

As set forth below, Plaintiffs have undertaken diligent efforts to identify and serve Defendants but have been unable to complete service due to circumstances outside their control.

## **II. Efforts made to serve each specific defendant.**

The plaintiffs asked UAMS by interrogatory at the Claims Commission for the last known address of each potential witness, which would include each defendant. UAMS objected to the interrogatory and demanded the plaintiffs litigate against the individuals after the plaintiffs filed a motion to compel discovery.

The plaintiffs asked the Board of Trustees for the last known addresses of the defendants by interrogatory. The board objected by filing a motion for a protective order that is still pending.

Records were searched for each defendant with a unique name at [arcountydata.com](http://arcountydata.com) the official site of Pulaski County. Common names like Elizabeth Brown and Shannon Cobb returned multiple addresses. Searches were made beginning on January 19, 2026.

Each defendant was searched for on [UAMS.edu](http://UAMS.edu). Searches were made beginning on January 19, 2026.

The plaintiffs made a request to UAMS Human Resources on April 23, 2026 to determine if the defendants who were not mentioned on the UAMS website still worked there. The list was produced on April 29, 2026 in the afternoon.

Responding defendants have all asserted insufficiency of process because Sean Lynn's name is only on the caption of the summons and not on the mailing address, which is the address

Sean Lynn asked UAMS to mail all correspondence to after the defendants allowed him to leave. Laura asked the deputy clerk who issued the first summonses processed why both home addresses were not included on the summonses. The deputy clerk explained that there is no capability in eFlex to have more than one address. Laura offered to have Sean go to the clerk's office with her to have summonses issued conventionally. The deputy clerk said not to do that. The plaintiffs ask leave to amend the summonses if the Court finds them insufficient after reading the pending motions to dismiss, responses and replies, within the extension of time to serve.

1. **The Board of Trustees of the University of Arkansas:** This defendant was served timely. Plaintiffs request only to extend the time to serve this defendant if the Court finds summons insufficient.

2. **Karrar Aljiboori:** Laura delivered the summons and complaint to the Sheriff office and paid \$50 on March 2, 2026. Joseph Shackelford 5131 was unable to serve on the first attempt; he was "unable to locate def @ hospital (need a valid contact for def). Service was completed March 25, 2026.

3. **Natalie J. Applebaum:** Pulaski County records show 30 KANIS CREEK PL. LITTLE ROCK, AR 72223-4919. Summons and complaint sent by certified mail restricted delivery on April 29, 2026. USPS tracking says Delivered, Left with Individual on May 2, 2026. Return receipt looks to be signed by a third party, which may invalidate it. **Natalie J. Applebaum** is still employed at UAMS according to web search and HR response. The plaintiffs request leave to perfect service by requesting a waiver or paying for the Sheriff to serve.

4. **Timothy J. Baer:** Pulaski County records show no results. **Timothy J. Baer** is not employed at UAMS according to web search and HR response. The plaintiffs request an extension of time to serve and an order that UAMS supply a last known address.

5. **Jarred M. Baxter:** Pulaski County records show no results. **Jarred M. Baxter** is not employed at UAMS according to web search, but is according to HR response. The plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

6. **Alexis Beavers:** Pulaski County records show no results. **Alexis Beavers** is not employed at UAMS according to web search and HR response. The plaintiffs request an extension of time to serve and an order that UAMS supply a last known address.

7. **Britney M. Beumeler:** This defendant was served timely. Plaintiffs request only to extend the time to serve this defendant if the Court grants a motion to dismiss with leave to amend the summons.

8. **Rebekah Danielle Beene:** Pulaski County records show no results. **Rebekah Danielle Beene** is not employed at UAMS according to web search, but is according to HR response. The plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

9. **Kristy Bienvenu:** Pulaski County records show no results. **Kristy Bienvenu** is not employed at UAMS according to web search, but is according to HR response. The plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

10. **Jennings R. Boyette:** A search of Pulaski County records in March came back void. On May 18, 2026, Laura tried looking for only the last name and an address came up for BOYETTE JENNINGS/BRITTANY, 15400 BEAU VUE DR, LITTLE ROCK, AR 72223. Boyette is not employed at UAMS according to web search but is according to HR response. Further, Boyette filed a motion to dismiss on May 15, 2026. He did not mention that the Court said “Plaintiffs may timely refile this motion [].” Because the Order was issued after May 7, 2026, it sounds like the Court realizes that the Plaintiffs’ motion was not completely without merit, but should have analyzed efforts to serve each defendant separately. The plaintiffs request an extension of time to serve **Jennings R. Boyette**.

11. **Carol Brizzolara:** Pulaski County records show no results. **Carol Brizzolara** is not employed at UAMS according to web search, but is according to HR response. The plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

12. **Cejae Brown:** Pulaski County records show no results. **Cejae Brown** is not employed at UAMS according to web search, but is according to HR response. The plaintiffs

request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

13. **Elizabeth Brown:** In January 2026, Pulaski County records showed several Elizabeth Browns owned property. The most likely was 109 Molly Lane, Maumelle, Arkansas, 72113 (With Graham Brown). A search on May 18, 2026 shows another likely 304 W J AVE NORTH LITTLE ROCK, AR 72116. A January web search showed Dr. Elizabeth Brown working at an unaffiliated Orthopedic clinic. A search on May 18 shows Dr. Brown as a UAMS employee. UAMS HR responded that Elizabeth Brown is an employee. Laura delivered a summons and complaint with \$50 to the sheriff's office on April 30, 2026. On May 13, 2026, representative Jordan Collins said no attempts at service were made yet. The plaintiffs request that service by the sheriff be deemed proper whenever it is made. If the sheriff is unable to make service, plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address.

14. **Nolan R. Bruce:** Pulaski County records show 2200 N. University Ave., Little Rock, Arkansas as owned by Nolan Bruce. Summons and complaint were sent to that address by certified mail restricted delivery on April 29, 2026. Nolan Bruce signed the return receipt on May 2, 2026.

15. **Amber Bryant:** Pulaski County records show no results. **Amber Bryant** is not employed at UAMS according to web search, but is according to HR response. The plaintiffs

request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

16. **Elizabeth Cate:** Pulaski County records show no results. **Elizabeth Cate** is not employed at UAMS according to web search and HR response. The plaintiffs request an extension of time to serve and an order that UAMS supply a last known address.

17. **Christopher S. Cathcart:** Pulaski County records show no results. **Christopher S. Cathcart** is not employed at UAMS according to web search but is according to HR response. The plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

18. **Benjamin L. Davis:** The Board of Trustees of the University of Arkansas: This defendant was served timely. Plaintiffs request only to extend the time to serve this defendant if the Court finds summons insufficient.

19. **Prashanth Reddy Damalcheruvu:** Pulaski County records show 209 Haywood Drive, Little Rock, Arkansas as owned by **Prashanth Reddy Damalcheruvu**. Summons and complaint were sent to that address by certified mail restricted delivery on April 29, 2026. **Prashanth Reddy Damalcheruvu** signed the return receipt on May 11, 2026. The summons and complaint were mailed timely. USPS tracking shows that a notice was left on May 2, 2026 and a second notice was sent on May 7, 2026. Plaintiffs ask that the service be considered timely.

20. **Rebekah Davis:** According to Pulaski County records DAVIS REBEKAH D/JEREMY C own 206 CHERRYWOOD DR., SHERWOOD, AR 72120-4104 and DAVIS REBEKAH/JAY KEVIN own 22914 WYLDWOOD DR, LITTLE ROCK AR 72210-5298. UAMS HR said Rebekah Davis no longer is employed there. Rather than knocking on doors, the plaintiffs request the Court order UAMS to provide a last known address.

21. **Joseph P. Deloach:** Laura found a Dr. Joseph Deloach who graduated from UAMS on the Texas Medical Board website with a work address of 3500 Gaston Ave., Dallas Texas. Summons and complaint were mailed to that address on March 24, 2026, certified mail restricted delivery. The return receipt but not the envelope was returned with a yellow sticker that says “UNABLE TO FORWARD/FOR REVIEW.” USPS tracking says “Delivered, Front Desk/Reception/Mail Room DALLAS, TX 75246 March 26, 2026 7:51 AM.” Dr. DeLoach did not respond. The plaintiffs request the Court order UAMS to provide a last known address.

22. **Amanda Diehl:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker

also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasili Khammad, wrote that “unchecked power [at UAMS] could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

23. **Jaicey Dowd:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

24. **Nathan Ernst:** This defendant was served. The plaintiffs ask leave to amend Nathan Ernst’s summons if the Court finds it insufficient after reading the pending motions to dismiss, responses and replies, and for an extension of time to serve.

25. **James Fitsimones:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

26. **Chrystal T. Fullen:** UAMS Human Resources said Fullen is no longer employed there. Pulaski County records show an owner-occupant FULLEN CRYSTAL/CHARLES ROBERT at 8 CAMBAY CT LITTLE ROCK AR 72211-5524. Knowing Chrystal Fullen does not work at UAMS, the plaintiffs request an order for the Board to provide a last known address and extension of time to serve summons.

27. **Macall Gilmartin:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

28. **Tyler Gray:** Pulaski County records show no results. **Tyler Gray** is not employed at UAMS according to web search and HR response. The plaintiffs request an extension of time to serve and an order that UAMS supply a last known address.

29. **Emily Gray:** Laura delivered a summons and complaint with \$50 to the sheriff's office on April 30, 2026. On May 13, 2026, representative Jordan Collins said no attempts at service were made yet. The plaintiffs request that service by the sheriff be deemed proper whenever it is made. If the sheriff is unable to make service, plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address.

30. **Jordan W. Greer:** Laura did not find Dr. Jordan W. Greer while searching the UAMS website in March 2026. She did not see the post about this disturbing publication: Kalkwarf KJ, Bailey BJ, Wells A, Jenkins AK, Smith RR, **Greer JW**, Yeager R, **Bruce N**, **Margolick J**, Kost MR, **Kimbrough MK**, Roberts ML, **Davis BL**, Privratsky A, Curran GM. Using implementation science to decrease variation and high opioid administration in a surgical ICU. *J Trauma Acute Care Surg*. 2024 Apr 30. Epub ahead of print. PMID: 38685205.

Greer was working on this paper when Sean was administered fentanyl to treat non-surgical pain that he self-reported as a 2 out of 10.

Greer also wrote this note in the medical report: "Patient lacks capacity and continues to try and elope. Will give zyprexa, phenobarb, and ativan PRN. Will add precedex as needed for safety of patient and staff. Placed on 72 hour hold due to lack of capacity and potential elopement with mother." This was done without a petition to the Court, after seven days of confinement and Hospital Acquired Conditions.

31. **Shannon Hankins:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

32. **Brandon Hearn:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

33. **Rachel Hill:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

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Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

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34. **Mi-Ran Kim:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

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35. **Mary K. "Katie" Kimbrough:** Laura delivered a summons and complaint with \$50 to the sheriff's office on April 30, 2026. On May 13, 2026, representative Jordan Collins said no attempts at service were made yet. The plaintiffs request that service by the sheriff be deemed proper whenever it is made. If the sheriff is unable to make service, plaintiffs request an extension

of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address.

36. **Alyssa Kirkpatrick:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

37. **Jacob Langston:** Pulaski County records show no results. **Jacob Langston** is not employed at UAMS according to web search and HR response. The plaintiffs request an extension of time to serve and an order that UAMS supply a last known address.

38. **Eric Lambert:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant,

wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

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A prior resident at UAMS, Dr. Vasili Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

39. **Payton D. Lea:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

40. **Ariana Limon:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

41. **Noah Lloyd:** Pulaski County records show no results. **Noah Lloyd** is not employed at UAMS according to web search and HR response. The plaintiffs request an extension of time to serve and an order that UAMS supply a last known address.

42. **Joseph F. Margolick:** This defendant was served. The plaintiffs ask leave to amend Nathan Ernst's summons if the Court finds it insufficient after reading the pending motions to dismiss, responses and replies, and for an extension of time to serve.

43. **Sarah E. Martin:** UAMS Human Resources said Martin is no longer employed there. Pulaski County records show an owner-occupant MARTIN SARAH/HAYWARD CHRISTOPHER at 64 EMERALD DR, MAUMELLE AR 72113-6039. Knowing Sarah E. Martin does not work at UAMS, the plaintiffs request an order for the Board to provide a last known address and an extension of time to serve summons.

44. **Tyree McClure:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs

purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the

constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

45. **Zachary A. McConnell:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasili Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

46. **Elizabeth McNulty:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant,

wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

47. **Jordan Millsapps:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasili Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

48. **Anna G. Morris:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

49. **Sriram Navuluri:** There is no property ownership listed for Sriram Navuluri in Pulaski County. Sriram Navuluri is not employed at UAMS according to web search and HR response. Sriram Navuluri filed a motion to dismiss on May 15, 2026. He did not mention that the Court said, “Plaintiffs may timely refile this motion [].” Because the Order was issued after May 7, 2026, it sounds like the Court realizes that the Plaintiffs’ motion was not completely without merit but should have analyzed efforts to serve each defendant separately. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Sriram Navuluri.**

50. **Derrick C. Nichols:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

51. **Mason Noble:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

52. **Kristina Ong:** There is no property ownership listed for **Kristina Ong** in Pulaski County. **Kristina Ong** is not employed at UAMS according to web search and HR response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Kristina Ong**.

53. **Na’Kika Perkins:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

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A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

54. **Erika A. Petersen:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

55. **Brittany Presson:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

56. **Nathan Redding:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break

the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

57. **Edward Reece:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

58. **Arthur Rezayev:** This defendant was a key actor in the multiple catheterizations without consent on January 21 to 23, 2024. It would be a gross miscarriage of justice to deny Sean his day in court against Arthur Rezayev, after Arthur Rezayev brutalized Sean. Dr. Rezayev did not serve a summons on Sean before imprisoning him and battering him. In fact, there was no petition ever filed to obtain lawful custody over Sean.

59. **Brenda Roberts:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

60. **Tyler K. Rose:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that "unchecked power could end a career overnight." *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real->

protections.html. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

61. **Christian Rosenbaum:** There is no property ownership listed for **Christian Rosenbaum** in Pulaski County. **Christian Rosenbaum** is not employed at UAMS according to web search and HR response. He was at a school in Jonesboro according to a Facebook post and blurb on the UAMS website. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Christian Rosenbaum**.

62. **Kristen Rosenbaum:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the

reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that "unchecked power could end a career overnight." *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. "For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question." *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

63. **Tonya R. Sanders:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break

the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasili Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

64. **Jackson Sargent:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

65. **Hannah Scimenti:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

66. **Carmen Shaw:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

67. **Christian Spallino:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

68. **Caroline Steele:** The plaintiffs were waiting for this defendant’s address to send a waiver package. Laura’s entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband’s property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. “Jaliyah Rucker, PCT, not made a defendant, wrote ‘pt has been asking “why can’t I just go”’ pt becoming agitated.’ Rucker made the reasonable connection between Lynn’s desire to leave and his agitation. She did not attribute his

agitation to the effects of a fictionalized fall from three stories high.” *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean’s behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS. A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

69. **Krista J. Stephenson:** There is no property ownership listed for **Krista J. Stephenson** in Pulaski County. **Krista J. Stephenson** is not employed at UAMS according to web search and HR response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Krista J. Stephenson**.

70. **Jordan M. Takasugi:** There is no property ownership listed for **Jordan M. Takasugi** in Pulaski County. **Jordan M. Takasugi** is not employed at UAMS according to web search and HR response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Jordan M. Takasugi**.

71. **Evelyn Tipton:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

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Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

72. **Marisa D. Tran:** There is no property ownership listed for **Marisa D. Tran** in Pulaski County. **Marisa D. Tran** is not employed at UAMS according to web search and HR

response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Marisa D. Tran**.

73. **Julien P. Vinas**: There is no property ownership listed for **Julien P. Vinas** in Pulaski County. **Julien P. Vinas** is not employed at UAMS according to web search and HR response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Julien P. Vinas**.

74. **Charles Waters**: There is no property ownership listed for **Charles Waters** in Pulaski County. **Charles Waters** is not employed at UAMS according to web search and HR response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Charles Waters**.

75. **Adam S. Watkins**: The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers

with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant's address, and that the Court extends the time to serve summonses.

76. **Derrick Wilkes:** There is no property ownership listed for **Derrick Wilkes** in Pulaski County. **Derrick Wilkes** is not employed at UAMS according to web search and HR response. The plaintiffs request an order to the Board to provide Plaintiffs with a last known address and extension of time to serve **Derrick Wilkes**.

77. **Edward Williams:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break

the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasili Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

78. **Lyrex Williams:** Pulaski County records show no results. **Lyrex Williams** is not employed at UAMS according to web search but is according to HR response. The plaintiffs request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

79. **Kesley M. Winn:** Pulaski County records show no results. **Kesley M. Winn** is not employed at UAMS according to web search but is according to HR response. The plaintiffs

request an extension of time to serve and an order that UAMS reimburse for sheriff service and supply a last known address if sheriff service fails.

80. **Leslie Witt:** The plaintiffs were waiting for this defendant's address to send a waiver package. Laura's entire income is approximately \$650 per month. Her savings by using waivers would be enough to pay her and her husband's property taxes for a year.

The Board allowed for the destruction of the surveillance video that would show the defendants that were the roughest when capturing Sean as he tried to escape. The plaintiffs purposefully did not name Jaliyah Rucker, PCT. "Jaliyah Rucker, PCT, not made a defendant, wrote 'pt has been asking "why can't I just go"' pt becoming agitated.' Rucker made the reasonable connection between Lynn's desire to leave and his agitation. She did not attribute his agitation to the effects of a fictionalized fall from three stories high." *Compl.* ¶ 105. Ms. Rucker also admitted to Laura that she gave Sean a couple granola bars and that she played checkers with Sean and Sean won. She specified in the record that she was able to coax Sean back to the room gently.

Likewise, the plaintiffs did not name Nurse Jason Patterson. Nurse Patterson allowed Sean to eat the sushi Laura brought for Sean. *Compl.* ¶ 226. Nurse Patterson also agreed to stop implanting memories by telling Sean he fell 35 feet. No one but Sean knew how far he fell. Sean's behavior was consistent with intoxication, not a three-story fall.

This defendant may feel pressure to stay quiet if called as a witness. But when held accountable for intentional conduct that is not insured, this defendant has an incentive to break

the silence and produce written communications that reflect what truly happened to the plaintiffs at UAMS.

A prior resident at UAMS, Dr. Vasilii Khammad, wrote that “unchecked power could end a career overnight.” *International Medical Graduates Need Real Protections*, KevinMD, May 13, 2026, <https://kevinmd.com/2026/05/international-medical-graduates-need-real-protections.html>. “For many of my colleagues, speaking up about concerns did not feel easy. Over time, a culture developed in which residents became increasingly hesitant to voice disagreement or raise problems openly out of fear of professional consequences: Those individuals could find themselves subjected to focused reviews, disciplinary pressure, and the constant threat of dismissal from the program. In some cases, their professional judgment and psychological stability were also called into question.” *Id.*

Dismissing this defendant because those in power at UAMS refused to allow the defendant to be found would be unjust. The plaintiffs request that the Board be ordered to produce the defendant’s address, and that the Court extends the time to serve summonses.

81. **Susan Zaleski (now Norsworthy)**: Laura delivered a summons and complaint to the Sheriff’s office on April 29, 2026 and paid \$50 for service. The name is misspelled on the receipt. The plaintiffs had a hard time finding Susan Zaleski because she changed her name after January 27, 2024. Susan Zaleski Norsworthy is a key defendant, because Laura video recorded this charge nurse saying UAMS does not give “benzos to TBIs” on January 24, 2024. Nurse Norsworthy had supervised several administrations of benzodiazepines the day of the conversation.

82. Clinician Doe Defendants 1: There is no record in the medical report of who tackled Sean and held him while he was bound to the cot railings. UAMS refused to make any meaningful response to interrogatories at the Claims Commission. Plaintiff request more time to discover who chased Sean down hallways and guarded doors.

83. Clinician Doe Defendants 2: There is no record in the medical report of who tackled Sean and held him while he was bound to the cot railings. UAMS refused to make any meaningful response to interrogatories at the Claims Commission. Plaintiff request more time to discover who chased Sean down hallways and guarded doors.

84. Clinician Doe Defendants 3: There is no record in the medical report of who tackled Sean and held him while he was bound to the cot railings. UAMS refused to make any meaningful response to interrogatories at the Claims Commission. Plaintiff request more time to discover who chased Sean down hallways and guarded doors.

85. Clinician Doe Defendants 4: There is no record in the medical report of who tackled Sean and held him while he was bound to the cot railings. UAMS refused to make any meaningful response to interrogatories at the Claims Commission. Plaintiff request more time to discover who chased Sean down hallways and guarded doors.

86. Clinician Doe Defendants 5: There is no record in the medical report of who tackled Sean and held him while he was bound to the cot railings. UAMS refused to make any meaningful

response to interrogatories at the Claims Commission. Plaintiff request more time to discover who chased Sean down hallways and guarded doors.

87. Security and Police Doe Defendants 1: Laura spoke to UAMS Police Department Officers Robertson and Clifton Moore and was told there is no record of any disturbance concerning Sean Lynn from January 13, 2024 to January 27, 2024. Plaintiffs request more time to determine through discovery who was on duty watching the surveillance cameras and monitoring the hallways during Sean's attempts to leave the hospital that are well documented by the medical report and the plaintiffs' videos.

88. Security and Police Doe Defendants 2: Laura spoke to UAMS Police Department Officers Robertson and Clifton Moore and was told there is no record of any disturbance concerning Sean Lynn from January 13, 2024 to January 27, 2024. Plaintiffs request more time to determine through discovery who was on duty watching the surveillance cameras and monitoring the hallways during Sean's attempts to leave the hospital that are well documented by the medical report and the plaintiffs' videos.

89. Security and Police Doe Defendants 3: Laura spoke to UAMS Police Department Officers Robertson and Clifton Moore and was told there is no record of any disturbance concerning Sean Lynn from January 13, 2024 to January 27, 2024. Plaintiffs request more time to determine through discovery who was on duty watching the surveillance cameras and monitoring the hallways during Sean's attempts to leave the hospital that are well documented by the medical report and the plaintiffs' videos.

90. Security and Police Doe Defendants 4: Laura spoke to UAMS Police Department Officers Robertson and Clifton Moore and was told there is no record of any disturbance concerning Sean Lynn from January 13, 2024 to January 27, 2024. Plaintiffs request more time to determine through discovery who was on duty watching the surveillance cameras and monitoring the hallways during Sean's attempts to leave the hospital that are well documented by the medical report and the plaintiffs' videos.

91. Security and Police Doe Defendants 5: Laura spoke to UAMS Police Department Officers Robertson and Clifton Moore and was told there is no record of any disturbance concerning Sean Lynn from January 13, 2024 to January 27, 2024. Plaintiffs request more time to determine through discovery who was on duty watching the surveillance cameras and monitoring the hallways during Sean's attempts to leave the hospital that are well documented by the medical report and the plaintiffs' videos.

### **III. Plaintiffs request an extension of time to complete service.**

WHEREFORE, Plaintiffs respectfully request that the Court extend the time for service of summons by an additional 120 days pursuant to Ark. R. Civ. P. 4(i).

Plaintiffs further request that the Court grant such other and further relief as it deems just and proper, including, if appropriate, ordering Defendants to provide last known addresses for purposes of service or facilitating coordination of waivers of service for those Defendants who remain employed by UAMS.

Respectfully Submitted,



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May 19, 2026

/s/ Laura Hammett

May 19, 2026

Laura Hammett, in pro se  
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(760) 966-6000  
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**Certificate of Service**

I, Laura Hammett, hereby certify that on May 19, 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 will also deliver a file stamped copy by email to Plaintiff Sean Lynn who joined in this motion at SeanLynnP@yahoo.com.

/s/ Laura Hammett

Laura Hammett  
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