

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

Plaintiffs' Joint Opposition to Jennings R. Boyette and Sriram Navuluri's Motion to Dismiss Each Plaintiffs' Claims

Comes now Co-Plaintiffs Sean Lynn ("Sean")¹ and Laura Hammett ("Laura"), each pro se, and for their Joint Opposition to Jennings R. Boyette and Sriram Navuluri's Motion to Dismiss all claims against them state:

1. Jennings R. Boyette and Sriram Navuluri asked this Court to dismiss all claims against them based on their argument that Sean and Laura "failed to serve" process timely or "get an extension of time from this Court" to serve process after the end of the 120-day window. *Boyette Mot.*, at p. 1, 2. Boyette and Navuluri specified that dismissal of the "medical negligence claims" should be with prejudice because the statute of limitations has now expired. *Boyette/Navuluri Mot.*,

¹ Common names are used because UAMS employees wrote versions of Laura Lynn in the medical report and using Lynn may be confusing.

at p. 2. Sean still has viable 42 U.S.C. 1983 claims against Boyette and Navuluri, so a dismissal with prejudice is an inappropriate.

2. The order of this Court issued on May 12, 2026 included permission to refile timely if the plaintiffs expressed good cause for the extension with specificity. *Order*, at p. 2 (“Plaintiffs may timely refile this motion”). Sean and Laura refiled their motion for extension of time with separate sections describing efforts to serve each defendant, including Boyette and Navuluri on May 19, 2026. The motion is pending. Therefore, the *Boyette/Navuluri motion to dismiss* is premature.

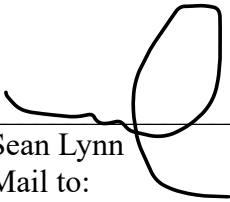
3. Further, Boyette and Navuluri’s assertion that a dismissal with prejudice is mandatory is false. Sean and Laura intend to file a second complaint if there are any defendants dismissed. Sean’s claims against Boyette and Navuluri will be for denying Sean’s well settled right to bodily autonomy under color of law, pursuant to 42 U.S.C. § 1983. These claims are based on the same conduct as the medical claims, that have a two-year statute of limitations, but have a three-year statute of limitations.

4. Boyette and Navuluri’s motion to dismiss is evidence that the medical doctors were aware of and zealous in protecting their own rights to due process; while failing to extend due process to Sean before binding him naked to a bed, forcing controlled substances into his body, catheterizing, dehydrating, and forcing him to defecate in a bedpan though he was fully capable and begging to use a toilet. It is absurd to allow Boyette and Navuluri get away with a blatant violation of an injured man’s right to due process because their victim’s timely motion for extension of time to provide due process needed to be restructured.

Wherefore, the plaintiffs ask that Jennings R. Boyette and Sriram Navuluri’s motion to dismiss all claims against them be denied, because the plaintiffs exercised the gracious permission

of this Court to timely refile their motion for extension of time to serve process. Further, the plaintiffs ask that if claims are dismissed, they will be dismissed without prejudice, allowing for alternative claims based on the same conduct, transaction or occurrence to proceed.

Respectfully Submitted,



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May 28, 2026

/s/ Laura Hammett

May 28, 2026

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Certificate of Service

I, Laura Hammett, hereby certify that on May 28, 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

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