

IN THE CIRCUIT COURT OF PULASKI, ARKANSAS

SEAN LYNN; et al.

PLAINTIFFS

v.

Case No. 60CV-26-216

BOARD OF TRUSTEES of the UNIVERSITY
of ARKANSAS, in their official capacity;
et al.

DEFENDANTS

Sean Lynn's Response to Prashanth Reddy Damalcheruvu's First Set of Requests for Admission

Comes now Pro Se Plaintiff Sean Lynn in response to requests for admission propounded by Defendant Prashanth Reddy Damalcheruvu and emailed to Lynn on September 3, 2026:

REQUEST FOR ADMISSION NO. 1: Admit that you do not have testimony from a qualified medical expert to support the allegations of negligence against Dr. Prashanth Reddy Damalcheruvu in your Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO. 1: **Objection.** Irrelevant. I do not need an expert because the asserted negligence lies within the jury's comprehension as a matter of common knowledge. Ark. Code Ann. § 16-114-206(a). Expert testimony is not required when the asserted negligence lies within the comprehension of a jury of laymen, such as a surgeon's failure to sterilize her instruments or to remove a sponge from the incision before closing it. *Mitchell v. Lincoln*, 366 Ark. 592, 598, 237 S.W.3d 455, 460 (2006). I am questioning Prashanth Reddy Damalcheruvu, M.D.'s decision to force me not to recover from my initial head injury at home without the use of pharmaceuticals; and her failure to follow UAMS policy as explained in language lay persons can understand on the form UAMS PATIENT RIGHTS AND RESPONSIBILITIES. A copy of the 2023 version of the form is attached as Exhibit 22. Neither Prashanth Reddy Damalcheruvu, M.D. nor any other UAMS employee gave me a copy or alerted me to its existence. My mother found it on the internet after I returned home.

The law regarding involuntary confinement and non-consensual harmful or offensive contact is easy to understand. There are model jury instructions that are understood by jurors without any expert, other than the judge, explaining the law.

Arkansas law is clear that when a patient seeks release but is held against his will, he must be treated as an involuntary detainee with full due process protections, including a meaningful hearing with clear and convincing evidence. *Von Luce v. Rankin*, 267 Ark. 34, 39,

588 S.W.2d 445, 449 (1979). As in *Von Luce*, I was never afforded any hearing, judicial review, or due process before being confined for 14 days against my expressed wishes to leave.

The need for expert testimony specified in Ark. Code Ann. § 16-114-206(b) does not apply here. Informed consent presupposes that a patient consented to the procedure but may have done so without all information necessary to make a reasoned decision. *Millsap v. Williams*, 2014 Ark. 469, 14, 449 S.W.3d 291, 300. I refused treatment after the first CT Scan and blood test, when I was told there was no need for surgery. My suit is about lack of consent; not informed consent.

A jury can understand that Prashanth Reddy Damalcheruvu, M.D. did not invoke an emergency exception at any time.

The State has a due process obligation to provide appropriate medical care to persons in its custody, which must look to the intent of the State in its decision to involuntarily medicate the confined person. *Singleton v. Norris*, 338 Ark. 135, 138, 992 S.W.2d 768, 769 (1999). Here, it is easy to understand that chemical restraints were used by Prashanth Reddy Damalcheruvu, M.D. to hold me for observation and to participate in the second CT scan, made on the morning of January 14, 2024.

Arkansas courts distinguish between medical negligence requiring specialized knowledge and ordinary negligence involving basic safety measures that laypeople can understand. Prashanth Reddy Damalcheruvu's failure to ask for preservation of the surveillance video of her interactions with me in the Emergency Department is comprehensible to any reasonable jury member. A juror can make a reasonable inference that the evidence would show that whatever "treatment" Prashanth Reddy Damalcheruvu, M.D. performed on me was adverse to standard of care. These are not complex medical decisions requiring expert interpretation, but rather basic

administrative functions that any doctor must perform competently. The systematic destruction of video evidence particularly demonstrates consciousness of wrongdoing and violates fundamental principles of evidence preservation that any layperson can understand. UAMS's own policies required preservation of such evidence because my mother clearly stated that there would be litigation and UAMS counsel was consulted before my release. The deliberate destruction suggests Prashanth Reddy Damalcheruvu, M.D.'s awareness that the recorded conduct was legally problematic. Such ordinary negligence in documentation falls outside the specialized medical knowledge requiring expert testimony.

Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use as evidence in pending or reasonably foreseeable litigation; and it has long been the rule that spoliators should not benefit from their wrongdoing. *Kelsay v. Wise*, No. CA98-1487, 1999 WL 1203724, at *3 (Ark. Ct. App. Dec. 8, 1999).

A jury can comprehend as a matter of common knowledge the evidence that indicates that accepting an EMT's unverified statement unattributed to a witness, claiming that I had a death defying 35-foot fall yet still presented with no other indicator for level 1, 2 or 3 activation, was a breach of Prashanth Reddy Damalcheruvu, M.D.'s duty. Compl. at ¶¶ 95, 11-58. Prashanth Reddy Damalcheruvu, M.D. had access to my medical record and an obligation to read it. Apparently, she¹ did not.

A jury can comprehend as a matter of common knowledge the well settled law that the violation of a safety statute is evidence of negligence. *Bussell v. Missouri Pac. R. Co.*, 237 Ark. 812, 817, 376 S.W.2d 545, 548 (1964). A jury can comprehend, without expert testimony, that it

¹ The requests for admission served on behalf of Prashanth Reddy Damalcheruvu show a preference for using the pronouns "She/her" so I am using her preferred pronouns.

is imprudent to commit a criminal battery and false imprisonment against a man who is already injured.

For example, a person commits battery in the first degree if acting alone or with one or more other persons the person commits or attempts to commit a felony; and in the course of and in furtherance of the felony the person or an accomplice causes serious physical injury to any person under circumstances manifesting extreme indifference to the value of human life or another person who is resisting the felony or flight causes serious physical injury to any person. Ark. Code Ann. § 5-13-201; Compl. at ¶¶ 346-354.

A jury can comprehend as a matter of common knowledge that using physical and chemical restraints to confine a person, me, to a hospital without consent and without a lawful order is the felony of false imprisonment. Ark. Code Ann. § 5-11-103 (“A person commits the offense of false imprisonment in the first degree if, without consent and without lawful authority, the person knowingly restrains another person so as to interfere substantially with the other person's liberty in a manner that exposes the other person to a substantial risk of serious physical injury.”); Compl. at ¶¶ 346-354.

A jury can understand, without expert testimony, that Prashanth Reddy Damalcheruvu, M.D. committed the crimes of battery and false imprisonment against me. While confining me without consent and without a lawful order, she ordered staff under her supervision and control to drug and bind me. A jury can understand that committing these crimes was negligence per se, allowing for an inference of negligence.

A jury can understand that because the medical record contains no petition or physician certification under Ark. Code Ann. § 20-9-604—and no psychiatric hold petition—there was no legal authority to hold me. Compl. at ¶¶ 57, 58, 107-114.

Regardless of which party has the burden of proof, a jury can understand that an emergency exception did not apply, without any testimony from an expert. Arkansas law establishes that medical treatment without consent constitutes battery, but provides a narrow emergency exception. See *Millsap*, 2014 Ark. 469. Under Ark. Code Ann. § 20-9-603:

“Emergency” means a situation in which, in competent medical judgment, the proposed surgical or medical treatment or procedures are immediately or imminently necessary and any delay occasioned by an attempt to obtain a consent would reasonably be expected to jeopardize the life, health, or safety of the person affected or would reasonably be expected to result in disfigurement or impaired faculties.

The emergency exception operates under a conjunctive two-pronged test established in *Millsap*: "Consent is not required when an emergency exists AND there is no one immediately available who can provide consent for the patient." *Millsap*, 2014 Ark. 469 at 13, 449 S.W.3d at 299. Both conditions must be satisfied for the exception to apply, meaning the plaintiff can defeat the emergency doctrine by disproving either prong. Here, I was of sound mind when I initially refused treatment, subsequent intoxication was caused by the medical providers' battery, of which Prashanth Reddy Damalcheruvu, M.D. was an active conspirator, and my mother was available to inform the defendants that I did not want treatment by the defendants. Further, it was clear to all but the most cognitively impaired individuals that I wanted to leave and I had reason and the right to leave.

A jury can comprehend, using a small amount of common knowledge, that damage is caused by being forced to be hospitalized overnight so Prashanth Reddy Damalcheruvu, M.D. could force me to have my head scanned a second time. Besides the physical violation of detainment, my medical condition is an extremely private matter and Damalcheruvu required chemical sedation to be administered on me in order to obtain the expensive images she wanted to look at.

For example, courts find that mental anguish, an affront to personality, indignity, disgrace, humiliation and mortification to which the victim is subjected by battery is compensable. *Browder v. Gahr*, 258 Ark. 992, 996–97, 530 S.W.2d 359, 362 (1975).

A jury can comprehend that damalcheruvu, owing me a duty, failed to act to release me from imprisonment, therefore was a proximate cause of the damages I sustained from the time she should have tried to release me. Prashanth Reddy Damalcheruvu, M.D. is particularly liable. She was an assistant professor collecting \$584,976 per year salary. Yet she approved of the imprisonment and battery committed on January 13, 2024 that continued to January 27, 2024.

REQUEST FOR ADMISSION NO. 2: Admit that you do not have testimony from a qualified medical expert willing to testify that Dr. Prashanth Reddy Damalcheruvu failed to meet the applicable standard of care in his medical care and treatment of Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 2: **Objection.** Irrelevant. I do not need an expert because the standard of care that I assert Prashanth Reddy Damalcheruvu, M.D. failed to meet lies within the jury's comprehension as a matter of common knowledge.

A jury can understand that the majority of doctors in Arkansas studied or did a residency at UAMS. UAMS set the standard in Arkansas, as dismal as it is. Prashanth Reddy Damalcheruvu, M.D. violated almost every one of the patient rights defined by UAMS, including the right to refuse treatment and to leave UAMS against the advice of the health care providers, to the extent permitted by law. Compl. at ¶ 93.

UAMS admitted on the record generated by UAMS staff: "Arkansas has no law (and UAMS, no policy) that covers so-called 'medical holds,' which means that the ability to hold a

patient who wants to leave AMA can only happen in a very limited set of conditions where the team can show a significant risk of imminent harm could befall the incapacitated patient should they leave the hospital.” Compl. at ¶ 94. It does not take a brain surgeon to explain that Prashanth Reddy Damalcheruvu, M.D. violated this standard.

A procedure performed without a valid consent would be outside the standard of care. *Haupt v. Kumar*, 103 Ark. App. 298, 300, 288 S.W.3d 704, 706 (2008).

Prashanth Reddy Damalcheruvu, M.D. did not petition a court with a statement that claimed a need to override patient autonomy. Presumably, a competent doctor in Arkansas files a petition before overriding authority, unless the doctor knows the petition will be denied. It is easy to understand the triage report, initial test results and the words Dr. Bruce wrote at about 10 p.m. on the first night of the confinement: “Suspect his exam will get worse - ICU for close monitoring[.]” Compl. at ¶¶ 55, 56. Suspicion is not imminent need that would allow Prashanth Reddy Damalcheruvu, M.D. to vary from the standard of care of allowing me bodily autonomy.

A jury will also understand that every drugging and procedure that Prashanth Reddy Damalcheruvu, M.D. subjected me to after my right to leave UAMS Medical Center was violated by her¹ was harmful or offensive.

The need for expert testimony specified in Ark. Code Ann. § 16-114-206(b) does not apply here. Informed consent presupposes that a patient consented to the procedure but may have done so without all information necessary to make a reasoned decision. *Millsap v. Williams*, 2014 Ark. 469, 14, 449 S.W.3d 291, 300.

A jury can understand the reasonable inference from the failure to ask for the preservation of surveillance video. Spoliation is the destruction or significant alteration of evidence, or the failure to preserve property for another's use as evidence in pending or reasonably foreseeable

litigation; and it has long been the rule that spoliators should not benefit from their wrongdoing. *Kelsay*, No. CA98-1487, 1999 WL 1203724, at *3 (Ark. Ct. App. Dec. 8, 1999).

Further, a jury needs no expert to explain Damalcheruvu's failure to check for consent, ask for consent or contact my family, whose numbers were in my cell phone.

REQUEST FOR ADMISSION NO. 3: Admit that you do not have testimony from a qualified medical expert that there was an act or omission on the part of Prashanth Reddy Damalcheruvu, M.D. that was a proximate cause of injury or damage to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 3: **Objection**. Irrelevant. I do not need an expert because the fact there was an act or omission on the part of Prashanth Reddy Damalcheruvu, M.D. that was a proximate cause of injury or damage to me lies within the jury's comprehension as a matter of common knowledge.

Advertisements for the drugs Prashanth Reddy Damalcheruvu, M.D. forced into me are required to be written comprehensible to an ordinary person. They include side effects, warnings, precautions, and contraindications of the drugs. 21 C.F.R. § 202.1. I intend to read the warnings from each drug Prashanth Reddy Damalcheruvu, M.D. forced into me to the jury. I am not an expert and I understand those labels. So will the jury.

The jury can easily comprehend that there was foreseeable harm and injury to a person who wants to go to sleep in his own bed, to be bound in one position for days at a time, woken as often as captors torture their prisoners, starved, dehydrated and humiliated, instead. I accused Prashanth Reddy Damalcheruvu, M.D. of this conduct.

A jury can easily comprehend Prashanth Reddy Damalcheruvu's violation of my right to have a family member or representative of my choice notified promptly of my admission to the hospital. 42 C.F.R. § 482.13(b)(4).

Further, courts find that mental anguish, an affront to personality, indignity, disgrace, humiliation and mortification to which the victim is subjected by battery is compensable. *Browder*, 258 Ark. at 996–97, 530 S.W.2d at 362. No expert is required to show that it was foreseeable that being battered at Prashanth Reddy Damalcheruvu, M.D.'s direction was reasonably certain to cause the mental anguish, affront to personality, indignity, disgrace, humiliation and mortification that it caused me.

A jury can comprehend using common knowledge that it was foreseeable that forced dehydration, starvation, lack of uninterrupted sleep, administration of a pharmacology of controlled substances and being bound in one position for days at a time would foreseeably cause injury and damage. The same jury can easily understand that my claim that because Dr. Prashanth Reddy Damalcheruvu was a supervising assistant professor at the time of the false imprisonment and battery, she did not discourage those working under her from continuing with the false imprisonment and battery, and she "ordered" the conduct, that she was a proximate cause of the injury and damage.

A jury can comprehend using common knowledge that the numbers on the blood tests recorded by the defendants started in healthy range and got much worse, then within four days of leaving against medical advice, my blood was in the healthy range again.

It was foreseeable that I would be traumatized by being falsely imprisoned and battered as that is a natural consequence of Damalcheruvu's conduct. *Missouri Pac. R. Co. v. Yancey*, 178 Ark. 147, 10 S.W.2d 22, 24 (1928).

REQUEST FOR ADMISSION NO. 4: Admit that Prashanth Reddy Damalcheruvu, M.D. was not negligent in any way in connection with the care and treatment provided to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 4: **Objection.** This request should not be considered because it is legal in nature. The firm representing Prashanth Reddy Damalcheruvu, M.D. knows or should know that this request is impermissible. The Damalcheruvu requests are identical to the requests for admission filed and answered by the now dismissed defendants who were represented by Wright, Lindsey and Jennings LLP. (Those defendants will be named in my 42 USC 1983 federal case.) It is reasonable to believe that when Amelia H. Sandrock on behalf of Damalcheruvu accessed the WLJ requests, Ms. Sandrock also read my answers. To proceed otherwise would violate Rule 11's admonishment to make a reasonable inquiry before certifying a document.

As per my filed answers to the WLJ defendants, Wright, Lindsey and Jennings LLP represented Baptist Health and Dr. Patrick O'Connell in a medical malpractice case in 2013. The firm propounded, "*REQUEST FOR ADMISSION NO. 4:* Admit that Baptist was not negligent in the care and treatment of Vernon Hardesty." *Hardesty v. Baptist Health*, 2013 Ark. App. 731, 3, 431 S.W.3d 327, 330. The circuit court did not consider Baptist's fourth request, finding that it was legal in nature. *Hardesty*, 2013 Ark. App. at 4, 431 S.W.3d at 330. The same request was made on behalf of Dr. O'Connell and the lower court did not invalidate that request, erroneously, but not prejudicially. *Id.* at 5, 431 S.W.3d at 331.

Objection. This is an improper request for admission because Prashanth Reddy Damalcheruvu, M.D. knows or should know that I would not admit this; it is in direct

contradiction to my complaint. The purpose of requests for admission is to decrease the costs of litigation by narrowing the issues. It is not meant to be a tool to cause busy work for a pro se litigant in the hopes that the litigant fails to respond timely.

The request for admissions within our discovery procedure is intended to eliminate the effort, expense and time involved in proving such facts as are admitted and is not intended as some new or modern legal method of winning law suits without trial. The object of the civil court trial still remains to attain justice between the parties as nearly as possible, and the rules of civil procedure, including discovery, are intended to aid in that object.

Widmer v. Fort Smith Vehicle & Mach. Corp., 244 Ark. 626, 632, 427 S.W.2d 186, 190 (1968).

Notwithstanding my objections, I deny that Prashanth Reddy Damalcheruvu, M.D. was not negligent in any way in connection with the care and treatment provided to Sean Lynn.

REQUEST FOR ADMISSION NO. 5: Admit that Dr. Prashanth Reddy Damalcheruvu did not fail to meet the applicable standard of care in his medical care and treatment of Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 5: I deny that Dr. Prashanth Reddy Damalcheruvu did not fail to meet the applicable standard of care in his medical care and treatment of Sean Lynn.

REQUEST FOR ADMISSION NO. 6: Admit that there was no act or omission by Prashanth Reddy Damalcheruvu, M.D. that was the proximate cause of injury or damage to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 6: **Objection.** This request should not be considered because it is legal in nature. The firm representing Prashanth Reddy Damalcheruvu, M.D. knows this request is impermissible. The Damalcheruvu requests are identical to the requests for admission filed and answered by the now dismissed defendants who were represented by Wright, Lindsey and Jennings LLP. (Those defendants will be named in my 42 USC 1983 federal case.) It is reasonable to believe that when Amelia H. Sandrock on behalf of Damalcheruvu accessed the WLJ requests, Ms. Sandrock also read my answers. To proceed otherwise would violate Rule 11's admonishment to make a reasonable inquiry before certifying a document.

As per my filed answers to the WLJ defendants, Wright, Lindsey and Jennings LLP represented Baptist Health and Dr. Patrick O'Connell in a medical malpractice case in 2013. The firm propounded, "*REQUEST FOR ADMISSION NO. 5: Admit that any actions or inactions on the part of Dr. Patrick O'Connell were not the proximate cause of any damages or injuries alleged in your complaint.*" *Hardesty*, 2013 Ark. App. at 3, 431 S.W.3d at 330. The circuit court did not consider Dr. O'Connell's fifth request, finding that it was legal in nature. *Hardesty*, 2013 Ark. App. at 4, 5, 431 S.W.3d at 330, 331.

Notwithstanding my objection, I **deny** that no act or omission by Dr. Prashanth Reddy Damalcheruvu was the proximate cause of injury or damage to me.

REQUEST FOR ADMISSION NO. 7: Admit that Prashanth Reddy Damalcheruvu, M.D. complied with the standard of care required of him in the medical care and treatment provided to Sean Lynn.

RESPONSE TO REQUEST FOR ADMISSION NO. 7: **Objection.** Prashanth Reddy

Damalcheruvu, M.D. asked substantially the same request for admission No. 5, “Admit that Dr. Prashanth Reddy Damalcheruvu did not fail to meet the applicable standard of care in his medical care and treatment of Sean Lynn.” The only difference is using “complied with” in place of “did not fail to meet the applicable[.]” Prashanth Reddy Damalcheruvu, M.D. and the other defendants already stole two weeks of my life and I will probably die sooner than if I had been allowed to heal properly in my home after jumping 10 feet from a falling ladder. Stop asking the same questions over and over.

Notwithstanding the objection, I deny that Prashanth Reddy Damalcheruvu, M.D. complied with the standard of care required of him in the medical care and treatment provided to Sean Lynn.

REQUEST FOR ADMISSION NO. 8: Admit that Dr. Prashanth Reddy Damalcheruvu is not
liable in any way to you.

RESPONSE TO REQUEST FOR ADMISSION NO. 8: **Objection.** As the firm representing Prashanth Reddy Damalcheruvu, M.D. knows or should know from reading my answer to requests for admission to the exact requests (other than defendant’s name) filed in this case by the WLJ defendants, a request for admission of a purely legal matter is impermissible. A request for admission that asks a party to admit that a person is not liable is also legal in nature, as it pertains to a legal conclusion rather than a factual matter.

Where there are no facts mentioned in the request, it cannot be called an “application of facts to law.” *Matter of Adoption of Dailey*, 30 Ark. App. 8, 11, 784 S.W.2d 782, 783 (1989).

Notwithstanding the objection, I **deny** that “Prashanth Reddy Damalcheruvu, M.D. is not liable in any way to” me.

REQUEST FOR ADMISSION NO. 9: Admit that you do not have a reasonable cause affidavit against Prashanth Reddy Damalcheruvu, M.D. from a qualified expert as required by Ark. Code Ann. § 16-114-209(b).

RESPONSE TO REQUEST FOR ADMISSION NO. 9: **Objection.** Irrelevant. It is also unclear as to what the affidavit would address.

Ark. Code Ann. § 16-114-209(b) was ruled as unconstitutional, because the legislature was infringing on the court’s ability to make rules concerning procedural law. See *Summerville v. Thrower*, 369 Ark. 231, 253 S.W.3d 415 (2007). The court concluded that § 16–114–209(b) is procedural and turned to its asserted conflict with Rule 3. *Summerville*, 369 Ark. at 238, 253 S.W.3d at 420. The Arkansas Constitution is clear that rules of pleading, practice, and procedures for our courts fall within the domain of the Arkansas Supreme Court. Ark. Const. amend. 80, § 3. *Summerville*, 369 Ark. at 238, 253 S.W.3d at 420.

Further, before being deemed unconstitutional, the statute would not be applicable to this case. It begins, “In all cases where expert testimony is required under § 16-114-206[.]” § 16-114-209(b). I am not required to have expert testimony because the issues addressed by my claims are within the comprehension of a jury of my peers. § 16-114-206. No expert testimony is required to understand that I was falsely imprisoned and battered by Prashanth Reddy Damalcheruvu, M.D. A jury can read the UAMS patient rights, exhibit 22, and understand that Damalcheruvu violated my right to have a family member or other person of your choosing to be

notified promptly upon my admission to UAMS Medical Center; know the name of the physician who had primary responsibility for coordinating my care and the names of other health care providers who cared for me; to be informed that I was injected with Fentanyl, Benzos and other medication during the time Damalcheruvu was actively involved in my non-consensual treatment; refuse treat; and almost every other one of the listed rights.

REQUEST FOR ADMISSION NO. 10: Admit that you have no evidentiary support for the allegations made in your Complaint against Prashanth Reddy Damalcheruvu, M.D..

RESPONSE TO REQUEST FOR ADMISSION NO. 10: I deny that I have no evidentiary support for the allegations made in my Complaint against Prashanth Reddy Damalcheruvu, M.D..

REQUEST FOR ADMISSION NO. 11: Admit you have no evidentiary support for the damages claimed in your Complaint.

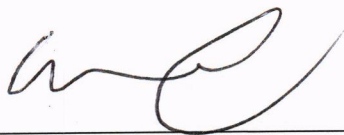
RESPONSE TO REQUEST FOR ADMISSION NO. 11: I deny that I have no evidentiary support for the damages claimed in your Complaint.

REQUEST FOR ADMISSION NO. 12: Admit Sean Lynn's injuries and damages as alleged in the Complaint were due to his pre-existing medical conditions and not a result of the medical care and treatment he received from Defendants.

RESPONSE TO REQUEST FOR ADMISSION NO. 12: Objection. This request is compound and the second clause is pregnant. Damalcheruvu is referring to non-consensual, harmful and offensive contact as “medical care and treatment” instead of “battery.”

Notwithstanding my objection, I deny that my injuries and damages as alleged in the Complaint were due to my pre-existing medical conditions and not a result of the battery by the defendants as alleged in my complaint.

I, Sean Lynn, declare under penalty of perjury under the laws of the State of Arkansas that the foregoing Responses to Requests for Admission are true and correct to the best of my knowledge, information, and belief.



Sean Lynn, in pro se
Mailing Address:
16 Gold Lake Club Road
Conway, Arkansas 72032
(213) 716-5231
SeanLynnP@yahoo.com

9-21-2026

Date

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' EXHIBIT 22
UAMS 2023 Published Patients' Rights

UAMS PATIENT RIGHTS AND RESPONSIBILITIES

UAMS Medical Center is committed to providing quality medical care to every patient. It is our policy to respect your individuality and dignity. We support your right to know about your medical condition and your right to participate in the decisions that affect your well-being. When you are treated as a patient at UAMS Medical Center, you or your representative have the following rights and responsibilities:

Patient Rights:

- To be treated with dignity and receive considerate care that is respectful of your personal beliefs and cultural and spiritual values.
- To have a family member or other person of your choosing to be notified promptly upon your admission to UAMS Medical Center.
- To know the name of the physician who has primary responsibility for coordinating your care and the names of other health care providers who will be caring for you.
- To be informed of your health status, diagnosis, and treatment options, including risks, benefits and alternatives, and prospects for recovery and outcomes of care in terms you understand.
- To make decisions regarding your medical care, including the right to refuse treatment and participate in the development and implementation of your plan of care;
- To appropriate assessment and management of your symptoms, including pain.
- To impartial medical care, regardless of race, color, national origin, religion, cultural beliefs, sex, gender identity, gender expression, sexual orientation, disability or financial status.
- To an interpreter as necessary to understand all pertinent communications;
- To have any restrictions on communications discussed with you;
- To leave UAMS against the advice of your health care providers, to the extent permitted by law.
- To be advised if your health care providers propose to engage in or perform research affecting your care or treatment, including the right to refuse to participate in such research proposals, and any such refusal will not jeopardize your access to treatment or services.
- To receive care in a safe setting, free from all forms of abuse or harassment.
- To be free from restraints and seclusion of any form that are used for the purpose of coercion, discipline, convenience, or retaliation by staff.
- To have your personal privacy respected. You have the right to restrict non-UAMS visitors and to have non-healthcare provider visitors leave prior to an examination and when treatment issues are being discussed.
- To confidential treatment of all communications and records pertaining to your care and stay in the hospital to the extent required by law. You will receive a separate Notice of Privacy Practices that explains your privacy rights in detail.
- To access your medical records within a reasonable time frame and have them explained unless restricted by law;
- To be informed of continuing health care requirements following discharge from the hospital and to be involved in the development and implementation of your discharge plan.
- To have your family and other guests present while receiving care at UAMS, and you have the right to define who your family is.
- To obtain an explanation of the bills related to your health care services.
- To access state and community protective services.
- To include or exclude any or all family members or support persons from participating in your care decisions.
- To have any restrictions on communications discussed with you.
- To formulate an advance directive and have it followed as allowed by law.
- To Pastoral Care support (page 501-688-2060) and the Clinical Ethics Consultation Service (page 501-405-8134) at your request.
- To express any concerns or grievances you have with UAMS orally or in writing by contacting any member of your health care team or by contacting the Department of Patient Relations at 501-296-1039, 24/7 including weekends & holidays, and to be informed of the outcome or response to your concerns or grievance within a reasonable time and without affecting the quality of your care.

Patient Responsibilities:

- To be respectful and considerate of members of your health care team and to refrain from discrimination, threats, verbal abuse, harassment, or aggressive behavior directed at members of the health care team.
- To follow UAMS Medical Center rules, regulations and policies affecting patient care and conduct.
- To respect the rights and property of other patients and UAMS Medical Center employees. Just as you want privacy, a quiet atmosphere and courteous treatment, so do other patients. You have the responsibility to comply with UAMS policies prohibiting smoking, the use of illegal substances or alcohol, and the presence of weapons.
- To provide, to the best of your knowledge, accurate and complete information about your present illness and past medical history, including medications, to your physicians and other members of your health care team.
- To ask questions when you do not understand information or instructions.
- To participate as best you can in making decisions about your medical treatment and carry out the plan of care agreed upon by you and your health care team.
- To cooperate with members of the health care team who provide care for you.
- To be reasonable in requests for medical treatment and other services.
- To pay bills promptly to ensure that your financial obligations for your health care are fulfilled and to request financial assistance if needed.
- To understand how to continue your care after you leave UAMS Medical Center, including when and where to get further treatment if needed, and to cooperate with members of the health care team who are assisting you with any follow up care needs.
- To accept responsibility for your own decision and actions if you choose to refuse treatment or not to comply with instructions given by your health care providers.
- To provide UAMS with a copy of your advance directive if you have one.

To express any concerns about the service you are receiving, you may speak to any staff member or call 501-296-1039 to speak to a Patient Relations Coordinator. If you wish to submit a written grievance, you may address it to:

Department of Patient Relations
4301 W. Markham, #728
Little Rock, AR 72205

We are committed to addressing your concerns in a timely manner.

You may also contact the following outside agencies about your concerns regardless of whether you have first used UAMS' grievance process:

Arkansas Department of Health
5800 West 10th – Suite 400
Little Rock, AR 72204-1704
Phone: 501-661-2201 Toll Free: 1-800-223-0340
Online: www.healtharkansas.com
KEPRO
5700 Lombardo Center Drive, Suite 100
Seven Hills, OH 44131
Toll Free: 1-844-430-9504

Office of Quality Monitoring:
The Joint Commission
One Renaissance Boulevard
Oakbrook Terrace, IL 60181
Phone: 630-792-5642 Toll Free: 1-800-994-6610
Fax: 630-792-5636
Email: complaint@jointcommission.org
Online: www.jointcommission.org

Certificate of Service

I, Sean Lynn, hereby certify that I handed Laura Hammett these answers so that she could deliver them to the clerk for filing. All other parties who have appeared are represented by persons who are registered users of the Arkansas Judiciary Electronic Filing System, which shall send notification to all registered parties or their legal representatives in this matter upon the clerk inputting my filing, which is effective electronic service.



9-21-2026

Sean Lynn, in pro se
Mailing Address:
16 Gold Lake Club Road
Conway, Arkansas 72032
(213) 716-5231
SeanLynnP@yahoo.com

Date

I, Laura Hammett, hereby certify that I received these signed answers from Sean Lynn, and with no intention of economic benefit to myself, and despite my own disabilities and responsibilities, brought his document to the clerk for filing. This is necessitated as an ADA accommodation for Sean Lynn who suffers from profound hearing loss, aphasia, PTSD symptoms and post traumatic epilepsy, that substantially limit major life activities including generating and organizing written documentation.



9-22-2026

Laura Hammett
16 Gold Lake Club Road
Conway, Arkansas 72032
(760) 966-6000
Bohemian_books@yahoo.com

Date