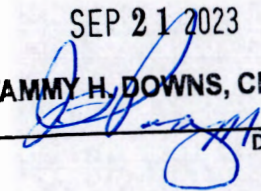


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

SEP 21 2023

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

LAURA LYNN HAMMETT, an)
individual,)

Plaintiff,)

vs.)

Case No.: 4:21-CV-00189-LPR

PORTFOLIO RECOVERY)
ASSOCIATES, LLC, a Limited)
Liability Company; DOES 1-99)

Defendants)

Plaintiff Laura Lynn Hammett's Notice of Supplemental Authority

I, Laura Lynn Hammett, Plaintiff in Pro Se hereby provide notice of the attached supplemental authority supporting my Motion to Settle the Record to

Correct Errors and Omissions in Transcript of December 1, 2021 Hearing (“Motion”). (Doc. 267.) In my Motion, I requested for the Court to order the Court Reporter to correct the transcript, in pertinent part, to include dialogue in which the Court explained the restrictions on designating anything as confidential if that information was already in the public domain or obtained by the receiving party from a third-party source. My Motion was filed on September 5, 2023. (Doc. 267.)

Since I filed my motion, I found a protective order filed as an exhibit in a case in which this Court served as an attorney while in his position as Arkansas Solicitor General. The protective order used language that is or approaches being identical to the language I had a foggy memory of when I wrote my motion.

That protective order was used to challenge a proposed protective order. (*Planned Parenthood of Arkansas & Eastern Oklahoma Inc., et al v. Cindy Gillespie, Director, Arkansas Department of Human Services*, USDC ARED Case No. 4:15-CV-00566-KGB, Doc. 217 and 217-1) The opposition to the protective order with its exhibit is attached as Exhibit 1.

Judge Rudofsky went to work for Walmart, Inc., before Doc. 217 was filed. (*Planned Parenthood.*, Doc. 179, Motion to Withdraw as Counsel and profile of Judge Lee P. Rudofsky presented during Senate Confirmation Hearings.) Still, it is reasonable to believe his colleagues conferred with the Solicitor general about

protective orders in similar cases before he withdrew and that this Court has probably seen similar language numerous times.

This is the first protective order dispute I have taken part in and have not seen that language prior to the hearing. It is impossible that I would have a memory and understanding of something so close to that language had it not been spoken to me. (Declaration of Laura Lynn Hammett, Exhibit 2, ¶ 2)

I had brain fog from Hashimoto's Disease and food allergies and sensitivities at the time of the hearing. I learned about my off the charts thyroglobulin antibodies in August 2022 and started on a protocol that included eliminating gluten and dairy from my diet. My energy and brain function improved but were still not optimum. (Id, ¶ 3)

My digestion did not improve. I attributed my oily feces to Coeliac Disease, which may also clear up by eliminating gluten. After about 10 months, I decided to investigate further. I paid for the P88 Food Antigen Test (not covered by insurance) and received the results on September 15, 2023. (Id. ¶ 4 and exhibit A)

I have food allergies and sensitivity to gluten and less so to dairy, but also to a long list of my favorite "healthy foods", corn, beans, soy, watermelon, beef, pork, eggs, apples, onions, celery, even to a certain extent black pepper, and the list goes on. When I vomited chocolate croissants since filing this suit, I attributed it to

a chocolate allergy and stress. It was really the eggs, flour, and butter, combined with the stress. (Id. ¶ 5)

I met with Dr. Josie Owens on September 18, 2023. She volunteered that the food allergies and sensitivities would cause brain fog. I did not need to ask. (Id. ¶6)

I asked my therapist the meaning of “brain fog” on September 7, 2023. She said it describes itself, but includes forgetfulness, like forgetting where you put your keys, an inability to concentrate and a lack of clarity. It does not include hearing dialogue that does not happen or forgetting that you didn’t hear the dialogue. (Id. ¶7)

I have restricted my diet to the short list of acceptable foods for five days and already see an improvement in energy and brain function, though I have a headache right now. (Id. ¶8)

It was difficult for me to do the research for this case at a law library when my digestion was bad. If I had a bowel movement, I had to clean myself in a shower, because of the gooey consistency of my stools. I could not afford my Westlaw subscription (and was let out of my contract based on indigency) and could not afford to pull up more than the \$30 of documents that are free on PACER each quarter. That and my ill health deterred me from finding the Planned Parenthood protective order sooner. The amount of research and work I

accomplished under these conditions is impressive; my failure to find the document timely should be excusable. (Id. ¶9)

My memory of what the Court said during the hearing of December 1, 2021 is consistent with the language in the protective order that I read for the first time in September 2023. (Id. ¶10) See Exhibit 2, Doc. 217-1 at 2, sections i, ii, iii, and iv of section 3(a). The Court included identical forms filed in other cases. That is why I argued throughout that those forms cannot be confidential.

Respectfully submitted,

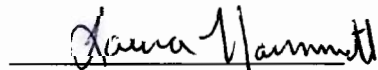
Dated September 21, 2023



Laura Lynn Hammett
16 Gold Lake Club Road
Conway, Arkansas 72032
760-966-6000
thenext55years@gmail.com
Plaintiff in Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2023, a true and exact copy of the foregoing with attachment of Exhibits was filed with the Clerk of the Court for entry on the electronic filing system which will cause service upon all counsel of record via email.



Laura Lynn Hammett
16 Gold Lake Club Road
Conway, Arkansas 72032
760-966-6000
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**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
LITTLE ROCK DIVISION**

**PLANNED PARENTHOOD OF ARKANSAS &
EASTERN OKLAHOMA INC., and JANE
DOES, 1-3, on their behalf and all others
similarly situated**

PLAINTIFFS

v.

Case No. 4:15CV566-KGB

**CINDY GILLESPIE, DIRECTOR,
ARKANSAS DEPARTMENT OF HUMAN
SERVICES, IN HER OFFICIAL CAPACITY**

DEFENDANT

**RESPONSE IN OPPOSITION TO PLAINTIFFS'
MOTION FOR AN EXPANDED PROTECTIVE ORDER**

Plaintiffs ask the Court to enter a patently overbroad protective order giving them the ability to unilaterally declare *any* information to be confidential, requiring it to be filed under seal and never become part of the public record. Worse still, Plaintiffs' proposed order gives them the ability to designate information as confidential even if it is already publicly available. Finally, the proposed order's procedures for challenging confidentiality designations are confusing and should be modified, if the Court enters any protective order.

LEGAL STANDARD

A court may, "for good cause, issue an order to protect a party or person from annoyance embarrassment, oppression, or undue burden or expense." Fed. R. Civ. P. 26(c)(1). The "requirement of a showing of good cause to support the issuance of a protective order indicates that 'the burden is upon the movant to show the necessity of its issuance, which contemplates a particular and specific demonstration of fact as distinguished from stereotyped and conclusory statements.'" *In re Terra Int'l*, 134 F.3d 302, 306 (5th Cir. 1998) (quoting *United States v.*

Garrett, 571 F. 2d 1323, 1326 n.3 (5th Cir. 1978)); *see also In re Violation of Rule 28(D)*, 635 F.3d 1352, 1358 (Fed. Cir. 2011) (“Parties frequently abuse Rule 26(c) by seeking protective orders for material not covered by the rule.”).

“[T]here is a stark difference between so-called ‘protective orders’ entered pursuant to the discovery provisions of Federal Rule of Civil Procedure 26, on the one hand, and orders to seal [judicial] records, on the other.” *Shane Grp., Inc. v. Blue Cross Blue Shield of Mich.*, 825 F.3d 299, 305 (6th Cir. 2016). “[T]he common-law right of access applies to judicial records in civil proceedings.” *IDT Corp. v. eBay*, 709 F.3d 1220, 1222 (8th Cir. 2013). Courts recognize a “strong presumption in favor of openness” as to court records. *Shane Grp., Inc.*, 825 F.3d at 299 (quoting *Brown & Williamson Tobacco Corp. v. F.T.C.*, 710 F.2d 1165, 1179 (6th Cir. 1983)). “Only the most compelling reasons can justify non-disclosure of judicial records.” *In re Knoxville News–Sentinel Co.*, 723 F.2d 470, 476 (6th Cir. 1983).

ARGUMENT

The Proposed Order’s Overbreadth

Plaintiffs’ requested protected order is vastly overbroad. Indeed, the language of the proposed order plainly allows Plaintiffs to designate nearly anything as confidential, irrespective of whether it is truly sensitive in nature or even publicly available. For example, Paragraph 1 of the proposed order states that it applies to documents and information “whether oral or written, produced, disclosed, or filed by any party or non-party in this action and designated as such in accordance with the terms hereof.” In other words, Plaintiffs may designate any document as confidential, no matter its source, or if its contents are publicly available. Yet publicly available documents and information cannot be subject to such protection. *See Seattle Times Co. v. Rhinehart*, 467 U.S. 20, 34 (1984) (“[P]art[ies] may disseminate the identical information

covered by the protective order as long as the information is gained through means independent of the court's processes.”).

For example, the names of multiple PPAEO practitioners are available in publicly filed documents in at least one case pending before this Court. Indeed, one of PPAEO's practitioners—along with multiple other Arkansas abortion practitioners—*publicly testified*. Yet nothing stops Plaintiffs from designating the identity of any of these practitioners as “Highly Confidential” under paragraph 2 of the proposed order, despite the publicly available nature of the information. Indeed, in another case before this Court, governed by a protective order nearly identical to the proposed order, the plaintiffs objected to defense counsel publicly naming one of their abortion providers in open court—a provider who is a *named plaintiff* in an abortion lawsuit before this Court. If the Court enters a protective order, it should make clear that it applies only to information and documents obtained through discovery and certainly does not apply to publicly available information.

Further problems abound. Turning to paragraph 3 of the proposed order, it deems confidential “any other information about the plaintiffs and each of the entities mentioned in ¶ 2 of this order, their staff members, physicians, and patients.” Under the literal terms of the proposed order, Plaintiffs may designate “any other information about” themselves as confidential. Giving a party carte blanche to designate as confidential *any information it pleases* renders the proposed order improperly overbroad. *See Citizens First Nat'l Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999) (holding invalid protective orders “giving each party carte blanche to decide what portions of the record shall be kept secret”).

This language allows *all* information about Plaintiffs to be designated as confidential, which renders the proposed order's more carefully-worded confidentiality provisions

superfluous. But even these provisions are utterly overbroad. Paragraph 4 of the proposed order broadly states the categories of “Confidential” information “may” include: information that is confidential under law; “trade secrets”; information that is “confidential” or “proprietary”; “sensitive business documents or information”; “confidential research, development or commercial information”; and “information implicating privacy interests, including but not limited to sensitive personal information.” The proposed order does not define ambiguous terms such as “confidential” or “sensitive,” thereby giving Plaintiffs the ability to deem anything they wish confidential. Under the terms of the proposed order, information is “confidential” simply on Plaintiffs’ say-so.

If the Court enters a protective order, it should disregard Plaintiffs’ proposed language and carefully delineate the categories of information and documents subject to confidentiality. The Court should deny Plaintiffs’ motion to enter the proposed order.

Filing Documents Designated Confidential

The proposed order’s staggering overbreadth is made all the worse by the fact that any document or information designated as confidential is entirely shielded from the public eye, even documents that become judicial records. Paragraph 16 requires any designated documents or information to be filed under seal and “shall not become a part of the public record except upon the written consent of the party or person supplying the information or unless so ordered by this Court.” In other words, the proposed order improperly gives Plaintiffs unchecked authority to shield any judicial records they wish from the public, without any required showing to overcome the presumption of public access to judicial records. If the Court enters a protective order, it should require a party seeking to keep judicial records sealed to overcome that burden on a document-by-document basis.

Challenging Confidential Designations

The procedures for challenging confidential designations are confusing and should, at a minimum, be clarified. Paragraph 6 of the proposed order states that a party may challenge an opposing party's designation of a document as confidential "in writing within [] 14 days." If the parties cannot come to an agreement, the proposed order states that the "producing party must seek relief from the Court." Yet the proposed order does not require the producing party to "seek relief" from the Court in any particular timeframe in order to maintain its designation of a given document as confidential. Given that documents are to be treated as confidential until the Court orders otherwise, a party wishing to file a document designated as confidential is left in an untenable position of waiting for the opposing party to seek relief from the Court to resolve the dispute. Under the proposed order, the party claiming confidentiality could shield a claim from judicial review by simply never seeking relief from the Court.

Defendant proposes two potential fixes for this provision. First, the Court could modify the challenge procedure such that the party opposing designation is to seek relief from the Court, rather than the designating party. This would at least require the designating party to defend its designation in opposing the challenging party's motion. Alternatively, this provision could be fixed by requiring the designating party, faced with a challenge to a confidential designation, to seek relief from the Court in a certain period of time. Other protective orders in abortion cases contain similar language. *See, e.g.*, Def.'s Ex. A at ¶ 11a (requiring party claiming confidential designation to seek relief from the court within 14 days or lose confidential status). Either of these options would significantly improve the proposed order.

CONCLUSION

For the foregoing reasons, Plaintiffs' request that the Court enter the overbroad proposed protective order should be denied. If the Court enters a protective order, it should do so in accordance with Defendant's positions stated above.

Respectfully submitted,

LESLIE RUTLEDGE
Arkansas Attorney General

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Arkansas Solicitor General

VINCENT M. WAGNER (2019071)
Deputy Solicitor General

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Attorneys for Defendant

EXHIBIT A

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

2017 JAN -6 PM 4: 08

CLERK OF DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY: AD

PLANNED PARENTHOOD OF GREATER §
TEXAS FAMILY PLANNING AND §
PREVENTATIVE HEALTH SERVICES, INC. §
et al., §

Plaintiffs, §

v. §

Civil Action No.1:15-cv-01058-SS

CHARLES SMITH, et al., §

Defendants. §

sa

~~Proposed~~ CONFIDENTIALITY AND PROTECTIVE ORDER

Before the court is the joint motion of the parties for the entry of a confidentiality and protective order (“Protective Order”). After careful consideration, it is hereby ORDERED as follows:

1. **Classified Information**

“Classified Information” means any information of any type, kind, or character that is designated as “Confidential”, “For Counsel Only”, or “Attorneys Eyes Only” by any of the supplying or receiving persons, whether it be a document, information contained in a document, information revealed during a deposition, information revealed in an interrogatory answer, or otherwise.

2. **Qualified Persons**

“Qualified Persons” means:

a. For Counsel or Attorneys Only information:

- i. retained counsel for the parties in this litigation and their respective staff;
- ii. actual or potential independent experts or consultants (and their administrative or clerical staff) engaged in connection with this litigation

(which shall not include the current employees, officers, members, or agents of parties or affiliates of parties) who, prior to any disclosure of Classified Information to such person, have signed a document agreeing to be bound by the terms of this Protective Order (such signed document to be maintained by the attorney retaining such person) and have been designated in writing by notice to all counsel;

iii. this court and its staff and any other tribunal or dispute resolution officer duly appointed or assigned in connection with this litigation.

b. For Confidential information:

i. the persons identified in subparagraph 2(a);

ii. the party, if a natural person;

iii. if the party is an entity, such officers or employees of the party who are actively involved in the prosecution or defense of this case who, prior to any disclosure of Confidential information to such person, have been designated in writing by notice to all counsel and have signed a document agreeing to be bound by the terms of this Protective Order (such signed document to be maintained by the attorney designating such person);

iv. litigation vendors, court reporters, and other litigation support personnel;

v. any person who was an author, addressee, or intended or authorized recipient of the Confidential information and who agrees to keep the information confidential, provided that such persons may see and use the Confidential information but not retain a copy.

c. Such other person as this court may designate after notice and an opportunity to be heard.

3. Designation Criteria

a. *Nonclassified Information.* Classified Information shall not include information that either:

i. is in the public domain at the time of disclosure, as evidenced by a written document;

ii. becomes part of the public domain through no fault of the recipient, as evidenced by a written document;

iii. the receiving party can show by written document was in its rightful and lawful possession at the time of disclosure; or

- iv. lawfully comes into the recipient's possession subsequent to the time of disclosure from another source without restriction as to disclosure, provided such third party has the right to make the disclosure to the receiving party.

b. *Classified Information.* A party shall designate as Classified Information only such information that the party in good faith believes in fact is confidential. Information that is generally available to the public, such as public filings, catalogues, advertising materials, and the like, shall not be designated as Classified.

Information and documents that may be designated as Classified Information include, but are not limited to, trade secrets, confidential or proprietary financial information, operational data, business plans, and competitive analyses, personnel files, personal information that is protected by law, and other sensitive information that, if not restricted as set forth in this order, may subject the producing or disclosing person to competitive, financial, or other injury or potential legal liability to third parties.

Correspondence and other communications between the parties or with nonparties may be designated as Classified Information if the communication was made with the understanding or reasonable expectation that the information would not become generally available to the public.

c. *For Counsel or Attorneys Only.* The designation "For Counsel Only" or "Attorneys Eyes Only" shall be reserved for information that is believed to be unknown to the opposing party or parties, or any of the employees of a corporate party. For purposes of this order, so-designated information includes, but is not limited to, product formula information, design information, non-public financial information, pricing information, customer identification data, certain study methodologies, and information protected from disclosure under state or federal law, including the confidentiality provisions set forth in ~~Tex. Health & Safety Code § 245.001~~ *et seq.* and ~~Tex. Health & Safety Code § 108.001~~ *et seq.*

d. *Ultrasensitive Information.* At this point, the parties do not anticipate the need for higher levels of confidentiality as to ultrasensitive documents or information. However, in the

event that a court orders that ultrasensitive documents or information be produced, the parties will negotiate and ask the court to enter an ultrasensitive information protocol in advance of production to further protect such information.

4. Use of Classified Information

Except as otherwise provided by law, all Classified Information provided by any party or nonparty in the course of this litigation shall be used solely for the purpose of preparation, trial, and appeal of this litigation and for no other purpose, and shall not be disclosed except in accordance with the terms hereof. In the event Defendants' counsel receives a request for Classified Information under the Public Information Act, Tex. Gov't Code Ch. 552 *et seq.*, Defendants' counsel will comply with the Public Information Act. Defendants' counsel will initiate the process set forth in Texas Gov't Code §§ 552.301 and 552.305 to seek an Attorney General decision from the Open Records Division regarding the requested information. Defendants' counsel will notify any third party whose information is implicated of the request as soon as is reasonably possible at the contact address provided by the third party, so the third party is afforded the opportunity to raise its own exceptions to required public disclosure under applicable state law.

5. Marking of Documents

Documents provided in this litigation may be designated by the producing person or by any party as Classified Information by marking each page of the documents so designated with a stamp indicating that the information is "Confidential", "For Counsel Only", or "Attorneys Eyes Only". In lieu of marking the original of a document, if the original is not provided, the designating party may mark the copies that are provided. Originals shall be preserved for inspection.

6. Disclosure at Depositions

Information disclosed at (a) the deposition of a party or one of its present or former officers, directors, employees, agents, consultants, representatives, or independent experts retained by counsel for the purpose of this litigation, or (b) the deposition of a nonparty may be designated by any party as Classified Information by indicating on the record at the deposition

that the testimony is “Confidential” or “For Counsel Only” and is subject to the provisions of this Order.

Any party also may designate information disclosed at a deposition as Classified Information by notifying all parties in writing not later than 30 days of receipt of the transcript of the specific pages and lines of the transcript that should be treated as Classified Information thereafter. Each party shall attach a copy of each such written notice to the face of the transcript and each copy thereof in that party’s possession, custody, or control. All deposition transcripts shall be treated as For Counsel Only for a period of 30 days after initial receipt of the transcript.

To the extent possible, the court reporter shall segregate into separate transcripts information designated as Classified Information with blank, consecutively numbered pages being provided in a nondesignated main transcript. The separate transcript containing Classified Information shall have page numbers that correspond to the blank pages in the main transcript.

Counsel for a party or a nonparty witness shall have the right to exclude from depositions any person who is not authorized to receive Classified Information pursuant to this Protective Order, but such right of exclusion shall be applicable only during periods of examination or testimony during which Classified Information is being used or discussed.

7. Disclosure to Qualified Persons

a. *To Whom.* Classified Information shall not be disclosed or made available by the receiving party to persons other than Qualified Persons except as necessary to comply with applicable law or the valid order of a court of competent jurisdiction; *provided, however*, that in the event of a disclosure compelled by law or court order, the receiving party will so notify the producing party as promptly as practicable (if at all possible, prior to making such disclosure) and shall seek a protective order or confidential treatment of such information. Information designated as For Counsel Only shall be restricted in circulation to Qualified Persons described in subparagraph 2(a).

b. *Retention of Copies During this Litigation.* Copies of For Counsel Only information shall be maintained only in the offices of outside counsel for the receiving party and,

to the extent supplied to experts described in subparagraph 2(a)(ii), in the offices of those experts. Any documents produced in this litigation, regardless of classification, that are provided to Qualified Persons shall be maintained only at the office of such Qualified Person and only necessary working copies of any such documents shall be made. Copies of documents and exhibits containing Classified Information may be prepared by independent copy services, printers, or illustrators for the purpose of this litigation.

c. Each party's outside counsel shall maintain a log of all copies of For Counsel Only documents that are delivered to Qualified Persons.

8. Unintentional Disclosures

Documents unintentionally produced without designation as Classified Information later may be designated and shall be treated as Classified Information from the date written notice of the designation is provided to the receiving party.

If a receiving party learns of any unauthorized disclosure of Confidential information or For Counsel Only information, the party shall immediately upon learning of such disclosure inform the producing party of all pertinent facts relating to such disclosure and shall make all reasonable efforts to prevent disclosure by each unauthorized person who received such information.

9. Documents Produced for Inspection Prior to Designation

In the event documents are produced for inspection prior to designation, the documents shall be treated as For Counsel Only during inspection. At the time of copying for the receiving parties, Classified Information shall be marked prominently "Confidential", "For Counsel Only", or "Attorneys Eyes Only" by the producing party.

10. Consent to Disclosure and Use in Examination

Nothing in this order shall prevent disclosure beyond the terms of this order if each party designating the information as Classified Information consents to such disclosure or if the court, after notice to all affected parties and nonparties, orders such disclosure. Nor shall anything in this order prevent any counsel of record from utilizing Classified Information in the examination

or cross-examination of any person who is indicated on the document as being an author, source, or recipient of the Classified Information, irrespective of which party produced such information.

11. Challenging the Designation

a. *Classified Information.* A party shall not be obligated to challenge the propriety of a designation of Classified Information at the time such designation is made, and a failure to do so shall not preclude a subsequent challenge to the designation. In the event that any party to this litigation disagrees at any stage of these proceedings with the designation of any information as Classified Information, the parties shall first try to resolve the dispute in good faith on an informal basis, such as by production of redacted copies. If the dispute cannot be resolved, the objecting party may invoke this Protective Order by objecting in writing to the party who designated the document or information as Classified Information. The designating party shall then have 14 days to move the court for an order preserving the designated status of the disputed information. The disputed information shall remain Classified Information unless and until the court orders otherwise. Failure to move for an order shall constitute a termination of the status of such item as Classified Information.

b. *Qualified Persons.* In the event that any party in good faith disagrees with the designation of a person as a Qualified Person or the disclosure of particular Classified Information to such person, the parties shall first try to resolve the dispute in good faith on an informal basis. If the dispute cannot be resolved, the objecting party shall have 14 days from the date of the designation or, in the event particular Classified Information is requested subsequent to the designation of the Qualified Person, 14 days from service of the request to move the court for an order denying the disputed person (a) status as a Qualified Person, or (b) access to particular Classified Information. The objecting person shall have the burden of demonstrating that disclosure to the disputed person would expose the objecting party to the risk of serious harm. Upon the timely filing of such a motion, no disclosure of Classified Information shall be made to the disputed person unless and until the court enters an order preserving the designation.

12. Manner of Use in Proceedings

In the event a party wishes to use any Classified Information in affidavits, declarations, briefs, memoranda of law, or other papers filed in this litigation, the party shall do one of the following: (1) with the consent of the producing party, file only a redacted copy of the information; (2) where appropriate (e.g., in connection with discovery and evidentiary motions) provide the information solely for *in camera* review; or (3) file such information under seal with the court consistent with the sealing requirements of the court.

13. Filing Under Seal

The clerk of this court is directed to maintain under seal all documents, transcripts of deposition testimony, answers to interrogatories, admissions, and other papers filed under seal in this litigation that have been designated, in whole or in part, as Classified Information by any party to this litigation consistent with the sealing requirements of the court.

14. Return of Documents

Not later than 120 days after conclusion of this litigation and any appeal related to it, any Classified Information, all reproductions of such information, and any notes, summaries, or descriptions of such information in the possession of any of the persons specified in paragraph 2 (except subparagraph 2(a)(iii)) shall be returned to the producing party or destroyed, except as this court may otherwise order or to the extent such information has been used as evidence at any trial or hearing. Notwithstanding this obligation to return or destroy information, counsel may retain attorney work product, including document indices, so long as that work product does not duplicate verbatim substantial portions of the text of any Classified Information.

15. Ongoing Obligations

Insofar as the provisions of this Protective Order, or any other protective orders entered in this litigation, restrict the communication and use of the information protected by it, such provisions shall continue to be binding after the conclusion of this litigation, except that (a) there shall be no restriction on documents that are used as exhibits in open court unless such exhibits were filed under seal, and (b) a party may seek the written permission of the producing party or

order of the court with respect to dissolution or modification of this, or any other, protective order.

16. Advice to Clients

This order shall not bar any attorney in the course of rendering advice to such attorney's client with respect to this litigation from conveying to any party client the attorney's evaluation in a general way of Classified Information produced or exchanged under the terms of this order; provided, however, that in rendering such advice and otherwise communicating with the client, the attorney shall not disclose the specific contents of any Classified Information produced by another party if such disclosure would be contrary to the terms of this Protective Order.

17. Duty to Ensure Compliance

Any party designating any person as a Qualified Person shall have the duty to reasonably ensure that such person observes the terms of this Protective Order and shall be responsible upon breach of such duty for the failure of such person to observe the terms of this Protective Order.

18. Waiver

Pursuant to Federal Rule of Evidence 502, neither the attorney-client privilege nor work product protection is waived by disclosure connected with this litigation.

19. Modification and Exceptions

The parties may, by stipulation, provide for exceptions to this order and any party may seek an order of this court modifying this Protective Order.

It is SO ORDERED this 6th day of January, 2017.


United States District Judge

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

LAURA LYNN HAMMETT, an)
individual,)

Plaintiff,)

vs.)

Case No.: 4:21-CV-00189-LPR

PORTFOLIO RECOVERY)
ASSOCIATES, LLC, a Limited)
Liability Company; DOES 1-99)

Defendants)

Declaration of Laura Lynn Hammett

1. I, Laura Lynn Hammett, Plaintiff in Pro Se declare that I am over the age of 21, competent to testify and have personal knowledge of the facts described below.

EXHIBIT 2

2. This is the first protective order dispute I have taken part in and have not seen that language prior to the hearing. It is impossible that I would have a memory and understanding of something so close to that language had it not been spoken to me.
3. I had brain fog from Hashimoto's Disease and food allergies and sensitivities at the time of the hearing. I learned about my off the charts thyroglobulin antibodies in August 2022 and started on a protocol that included eliminating gluten and dairy from my diet. My energy and brain function improved but were still not optimum.
4. My digestion did not improve. I attributed my oily feces to Coeliac Disease, which may also clear up by eliminating gluten. After about 10 months, I decided to investigate further. I paid for the P88 Food Antigen Test (not covered by insurance) and received the results on September 15, 2023. (Exhibit A is a true and correct copy of my communication with the ordering doctor.)
5. I have food allergies and sensitivity to gluten and less so to dairy, but also to a long list of my favorite "healthy foods", corn, beans, soy, watermelon, beef, pork, eggs, apples, onions, celery, even to a certain extent black pepper, and the list goes on. When I vomited chocolate croissants since filing this suit, I attributed it to a chocolate allergy and stress. It was really the eggs, flour, and butter, combined with the stress.

6. I met with Dr. Josie Owens on September 18, 2023. She volunteered that the food allergies and sensitivities would cause brain fog. I did not need to ask.
7. I asked my therapist the meaning of “brain fog” on September 7, 2023. She said it describes itself, but includes forgetfulness, like forgetting where you put your keys, an inability to concentrate and a lack of clarity. It does not include hearing dialogue that does not happen or forgetting that you didn’t hear the dialogue.
8. I have restricted my diet to the short list of acceptable foods for five days and already see an improvement in energy and brain function, though I have a headache right now.
9. It was difficult for me to do the research for this case at a law library when my digestion was bad. If I had a bowel movement, I had to clean myself in a shower, because of the gooey consistency of my stools. I could not afford my Westlaw subscription (and was let out of my contract based on indigency) and could not afford to pull up more than the \$30 of documents that are free on PACER each quarter. That and my ill health deterred me from finding the Planned Parenthood protective order sooner. The amount of research and work I accomplished under these conditions is impressive; I pushed myself to my limit for doing the kind of work that takes intense concentration, as opposed to watching my granddaughter play in the pool with a lifeguard on watch or

writing a blog based on research I already did and documents I already filed in court.

10. My memory of what the Court said during the hearing of December 1, 2021 is consistent with the language in the protective order that I read for the first time in September 2023. The description of what could not be designated confidential is the same as in the protective order under unclassified documents. The Court included identical forms filed in other cases in his description. That is why I argued throughout that those forms cannot be confidential.
11. I swear that the foregoing is the truth under penalty of perjury according to the laws of the United States of America.

Dated September 21, 2023



Laura Lynn Hammett
16 Gold Lake Club Road
Conway, Arkansas 72032
760-966-6000
thenext55years@gmail.com
Plaintiff in Pro Se


CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2023, a true and exact copy of the foregoing with attachment of Exhibits was filed with the Clerk of the Court for entry on the electronic filing system which will cause service upon all counsel of record via email.




Laura Lynn Hammett
16 Gold Lake Club Road
Conway, Arkansas 72032
760-966-6000
thenext55years@gmail.com

9/13/23 11:11 AM




They are suppose to alert you.




I will check and see if DR Scroggins received it yet

9/14/23 10:25 AM

Did Dr. scroggins get my finger prick test results yet? If not, please give me the labs phone number so I can ask them about it.



Friday 12:04 PM



Found the results! They were hiding in the inbox, lol. Just emailed them over to you

EXHIBIT A



PRECISION POINT DIAGNOSTICS

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P88-DIY Dietary Antigen Test

A Targeted Approach to Wellness



PATIENT INFO

NAME: LAURA HAMMETT
REQUISITION ID: ██████████0061
DOB: ██████/1962
SAMPLE DATE: 7/30/2023
RECEIVE DATE: 8/2/2023
DRAFT DATE: 8/18/2023

CLINIC INFO

SCROGGINS FAMILY MEDICINE
ADDRESS: 1355 Dave Ward Drive
STE
Conway, AR 72034
PHONE: (501)358-6767
FAX: 5013586715

Patient Report: Summary

DIETARY ANTIGEN	ALLERGY			SENSITIVITY	
	IgE	IgG4	Immune Tolerance IgG4 > IgE Abs*	IgG	C3d
Almond	LOW	LOW	YES	MODERATE	LOW
Apple	LOW	LOW		MODERATE	
Asparagus				LOW	LOW
Aspergillus Mix	LOW	LOW		LOW	
Avocado					
Banana					LOW
Barley	LOW	MODERATE	YES	LOW	MODERATE
Beef		LOW	YES	HIGH	
Black Pepper	LOW			LOW	LOW
Blueberry	LOW	LOW	YES	HIGH	LOW
Brewer's Yeast	LOW			LOW	LOW
Broccoli	LOW				MODERATE
Cabbage					
Cacao	LOW				
Candida	LOW				
Cantaloupe	LOW	LOW	YES	MODERATE	LOW
Carrot	LOW	LOW		LOW	
Casein	LOW	LOW	YES		
Cashew	LOW	MODERATE	YES	LOW	
Cauliflower	LOW	LOW		HIGH	LOW
Celery				MODERATE	LOW
Cherry			YES		LOW
Chicken		LOW	YES		LOW
Cinnamon					LOW
Clam	MODERATE	MODERATE		HIGH	MODERATE
Coconut	LOW				
Codfish	LOW			HIGH	LOW
Coffee	LOW	LOW		LOW	LOW
Corn	LOW	LOW		MODERATE	LOW
Cottonseed				LOW	
Cow's Milk	LOW	LOW	YES	LOW	LOW
Crab	LOW				LOW
Cucumber					LOW
Egg Albumin	HIGH			MODERATE	HIGH
Egg Yolk	LOW	LOW		MODERATE	LOW
English Walnut				LOW	
Flax Seed		LOW		LOW	LOW
Flounder				LOW	

This test has been developed and its performance characteristics determined by Precision Point Diagnostics. It has not been cleared by the U.S. Food and Drug Administration.

PATIENT NAME:

LAURA HAMMETT

REQUISITION ID:

0061

DRAFT DATE:

8/18/2023

Patient Report: Summary

DIETARY ANTIGEN	ALLERGY			SENSITIVITY	
	IgE	IgG4	Immune Tolerance IgG4 > IgE Abs*	IgG	C3d
Garlic	LOW				
Ginger	LOW	LOW	YES	LOW	LOW
Gluten	LOW	HIGH	YES	LOW	LOW
Goat's Milk	LOW	LOW	YES		
Grapefruit	LOW				LOW
Grapes	LOW				LOW
Green Olive	LOW				
Green Pea	LOW	MODERATE	YES	HIGH	LOW
Green Pepper	LOW	LOW		MODERATE	LOW
Halibut		LOW		MODERATE	
Honeydew					MODERATE
Hops		LOW		MODERATE	
Kidney Bean	LOW	HIGH	YES	LOW	MODERATE
Lemon					
Lettuce	LOW	LOW			LOW
Lima Bean	LOW	MODERATE	YES	LOW	MODERATE
Lobster	LOW	LOW		HIGH	LOW
Mushroom		MODERATE	YES	LOW	LOW
Mustard	LOW	MODERATE	YES	LOW	LOW
Navy Bean	LOW	HIGH	YES	LOW	MODERATE
Oat	LOW	LOW		LOW	LOW
Onion		LOW	YES	HIGH	MODERATE
Orange	LOW	LOW	YES		LOW
Peach	LOW			LOW	LOW
Peanut	LOW	LOW	YES	MODERATE	LOW
Pear					
Pecan					MODERATE
Pineapple		LOW	YES	LOW	
Plum				LOW	LOW
Pork		LOW		MODERATE	LOW
Rice	LOW	LOW		MODERATE	
Rye				MODERATE	
Salmon	LOW				LOW
Scallops				LOW	LOW
Sesame					LOW
Shrimp	LOW	LOW	YES		
Soybean				HIGH	
Spinach	LOW	LOW	YES	HIGH	LOW
Strawberry				HIGH	LOW
String Bean	LOW	HIGH	YES	MODERATE	LOW
Sweet Potato	LOW	LOW	YES	LOW	MODERATE
Tea					LOW
Tomato	LOW			HIGH	LOW
Tuna	LOW	LOW	YES	LOW	
Turkey				HIGH	
Vanilla	LOW	LOW		MODERATE	
Watermelon			YES	MODERATE	MODERATE
White Potato	LOW	LOW	YES	LOW	MODERATE
Whole Wheat				LOW	HIGH
Yellow Squash	LOW	LOW	YES	HIGH	LOW

Reference Range	High	Medium	Low	Normal
Increased Prevalence	> 10%	>= 50-90%	> 10-50%	< 10%
Average Prevalence	>Top 5%	>=75-95%	> 10-75%	< 10%

Reference Range is based on how reactive a person is compared to population distribution.
 Increased Prevalence: Foods that more people have a reaction to including dairy and casein, wheat and gluten, shellfish, tree nuts, and eggs.
 Average Prevalence: All other foods.

* Immune Tolerance is based upon the absolute (Abs) value of IgG4 compared to the absolute value of IgE.

This is different from percent reactivity which is given in the summary page to easily see which foods are the most reactive. Find absolute values for each food in the references range on the test results between pages 6-12.

This test has been developed and its performance characteristics determined by Precision Point Diagnostics. It has not been cleared by the U.S. Food and Drug Administration.

PATIENT NAME: LAURA HAMMETT REQUISITION ID: ██████████0061 DRAFT DATE: 8/18/2023

Patient Report: Less Restrictive Diet

Criteria for Less Restrictive Diet Logic

Eliminate: High IgG and/or High IgE foods

Rotate: Moderate IgG with High, Moderate, or Low Complement

Eliminate (IgG4): Based on presence of IgG-4 RD conditions (see Understanding the P88 for more information)

* Anytime gluten is removed, the rotation diet will remove all gluten containing grains regardless of IgE or IgG reactivity.

NO LIMITATION	ROTATE	ELIMINATE	ELIMINATE (IgG4)
These foods produce no immune reaction within your system at this time.	These foods should be rotated out of your diet for a period of 72 hrs or reduced in overall intake.	Remove these foods entirely from your diet.	Remove at Provider's Discretion
Apple Pear Asparagus Pecan Aspergillus Mix Pineapple Avocado Plum Banana Rice Black Pepper Salmon Brewer's Yeast Scallops Broccoli Sesame Cabbage Shrimp Cacao Sweet Potato Candida Tea Carrot Tuna Casein Vanilla Cashew White Potato Cherry Chicken Cinnamon Coconut Coffee Cottonseed Cow's Milk Crab Cucumber English Walnut Flax Seed Flounder Garlic Ginger Goat's Milk Grapefruit Grapes Green Olive Halibut Honeydew Hops Lemon Lettuce Lima Bean Mushroom Mustard Oat Orange Peach	Almond Cantaloupe Celery Corn Egg Yolk Green Pepper Peanut Pork Watermelon	Beef Blueberry Cauliflower Clam Codfish Egg Albumin Green Pea Lobster Onion Soybean Spinach Strawberry Tomato Turkey Yellow Squash	Gluten Kidney Bean Navy Bean String Bean Barley Rye Whole Wheat

This test has been developed and its performance characteristics determined by Precision Point Diagnostics. It has not been cleared by the U.S. Food and Drug Administration.

PATIENT NAME:

LAURA HAMMETT

REQUISITION ID:

██████████0061

DRAFT DATE:

8/18/2023

Patient Report: More Restrictive Diet

Criteria for Logic of More Restrictive Diet

Eliminate: High and Moderate IgE and/or IgG

Rotate: Low IgG with High, Moderate or Low Complement

Eliminate (IgG4): Based on presence of IgG-4 RD conditions (see Understanding the P88 for more information)

* Anytime gluten is removed, the rotation diet will remove all gluten containing grains regardless of IgE or IgG reactivity.

NO LIMITATION	ROTATE	ELIMINATE	ELIMINATE (IgG4)
<p>These foods produce no immune reaction within your system at this time.</p>	<p>These foods should be rotated out of your diet for a period of 72 hrs or reduced in overall intake.</p>	<p>Remove these foods entirely from your diet.</p>	<p>Remove at Provider's Discretion</p>
<ul style="list-style-type: none"> Aspergillus Mix Avocado Banana Broccoli Cabbage Cacao Candida Carrot Casein Cherry Chicken Cinnamon Coconut Cottonseed Crab Cucumber English Walnut Flounder Garlic Goat's Milk Grapefruit Grapes Green Olive Honeydew Lemon Lettuce Orange Pear Pecan Pineapple Salmon Sesame Shrimp Tea Tuna 	<ul style="list-style-type: none"> Asparagus Black Pepper Brewer's Yeast Coffee Cow's Milk Flax Seed Ginger Oat Peach Plum Scallops Sweet Potato White Potato 	<ul style="list-style-type: none"> Almond Apple Beef Blueberry Cantaloupe Cauliflower Celery Clam Codfish Corn Egg Albumin Egg Yolk Green Pea Green Pepper Halibut Hops Lobster Onion Peanut Pork Rice Soybean Spinach Strawberry String Bean Tomato Turkey Vanilla Watermelon Yellow Squash 	<ul style="list-style-type: none"> Barley Cashew Gluten Kidney Bean Lima Bean Mushroom Mustard Navy Bean Barley Rye Whole Wheat

This test has been developed and its performance characteristics determined by Precision Point Diagnostics. It has not been cleared by the U.S. Food and Drug Administration.

PATIENT NAME:

LAURA HAMMETT

REQUISITION ID:

0700210061

DRAFT DATE:

8/18/2023

Patient Report: Immune Index

The Immune Index is a calculation in which IgE, IgG, C3d are added together to show cumulative reactivity. If IgG4 is greater than IgE it blocks the reaction and IgE is not added into cumulative inflammatory formula. This is used to highlight foods that are creating multiple immune reactions.

Rank	DIETARY ANTIGEN	Immune Index
1	Egg Albumin	HIGH
2	Clam	HIGH
3	Blueberry	MODERATE
4	Codfish	MODERATE
5	Cauliflower	MODERATE
6	Green Pea	MODERATE
7	Kidney Bean	MODERATE
8	Lobster	MODERATE
9	Navy Bean	MODERATE
10	Spinach	MODERATE
11	Yellow Squash	MODERATE
12	String Bean	MODERATE
13	Tomato	MODERATE
14	Almond	MODERATE
15	Barley	MODERATE
16	Cantaloupe	MODERATE
17	Corn	MODERATE
18	Egg Yolk	MODERATE
19	Gluten	MODERATE
20	Green Pepper	MODERATE
21	Onion	MODERATE
22	Peanut	MODERATE
23	Lima Bean	MODERATE
24	Sweet Potato	MODERATE
25	White Potato	MODERATE
26	Black Pepper	LOW
27	Brewer's Yeast	LOW
28	Coffee	LOW
29	Ginger	LOW
30	Mustard	LOW
31	Oat	LOW
32	Peach	LOW
33	Strawberry	LOW
34	Watermelon	LOW
35	Whole Wheat	LOW
36	Cow's Milk	LOW
37	Apple	LOW
38	Broccoli	LOW
39	Celery	LOW
40	Pork	LOW
41	Rice	LOW
42	Vanilla	LOW
43	Asparagus	LOW
44	Aspergillus Mix	LOW

Rank	DIETARY ANTIGEN	Immune Index
45	Cashew	LOW
46	Beef	LOW
47	Carrot	LOW
48	Crab	LOW
49	Grapefruit	LOW
50	Grapes	LOW
51	Flax Seed	LOW
52	Lettuce	LOW
53	Mushroom	LOW
54	Orange	LOW
55	Plum	LOW
56	Salmon	LOW
57	Scallops	LOW
58	Soybean	LOW
59	Tuna	LOW
60	Turkey	LOW
61	Halibut	LOW
62	Honeydew	LOW
63	Hops	LOW
64	Pecan	LOW
65	Rye	LOW
66	Banana	
67	Cacao	
68	Candida	
69	Cherry	
70	Chicken	
71	Cinnamon	
72	Coconut	
73	Cottonseed	
74	Cucumber	
75	English Walnut	
76	Flounder	
77	Garlic	
78	Green Olive	
79	Pineapple	
80	Sesame	
81	Shrimp	
82	Tea	
83	Casein	
84	Goat's Milk	
85	Avocado	
86	Cabbage	
87	Lemon	
88	Pear	

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PRECISION POINT
DIAGNOSTICS

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www.precisionpointdiagnostics.com

P88-DIY (IgE/IgG4)

A Targeted Approach to Wellness

PATIENT INFO

NAME: LAURA HAMMETT
REQUISITION ID: 007000061
DOB: /1962
SAMPLE DATE: 7/30/2023
RECEIVE DATE: 8/2/2023
DRAFT DATE: 8/18/2023

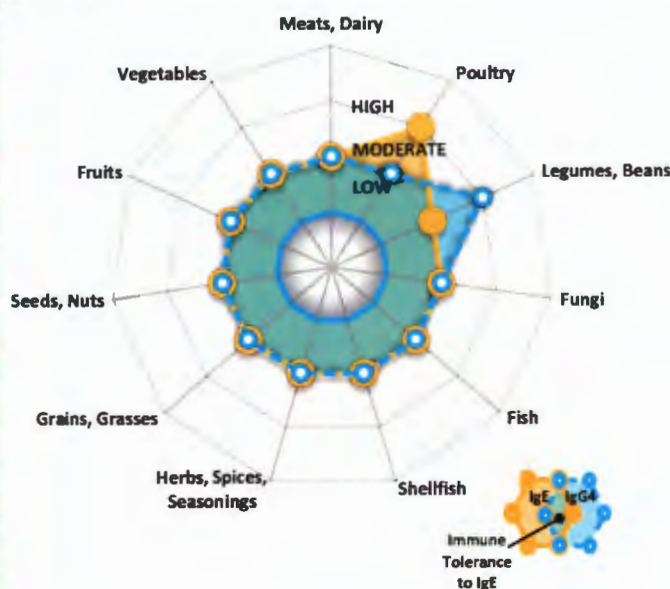
CLINIC INFO

SCROGGINS FAMILY MEDICINE
ADDRESS: 1355 Dave Ward Drive
STE
Conway, AR 72034
PHONE: (501)358-6767
FAX: 5013586715

Physician Report: IgE/IgG4 Food Allergies

Dietary Antigen Exposure by Food Group

	IgE	IgG4
Meats, Dairy	LOW	LOW
Poultry	MODERATE	LOW
Legumes, Beans	LOW	MODERATE
Fungi	LOW	LOW
Fish	LOW	LOW
Shellfish	LOW	LOW
Herbs, Spices,	LOW	LOW
Grains, Grasses	LOW	LOW
Seeds, Nuts	LOW	LOW
Fruits	LOW	LOW
Vegetables	LOW	LOW



Dietary Antigen Exposure by Food Group

In this test, a human serum sample is probed for the presence of IgE and IgG4 antibodies which have an exact affinity for specific dietary allergens. Dietary allergens are clustered by the food groups shown in the table and graph above. The quantitative summation of the IgE and IgG4 results within the offending food groups are expressed graphically. The exclusion of the offending food group(s) from the diet has been shown to reduce the severity of symptoms associated with food allergies.

Immune Tolerance To IgE

In high levels, IgG4 antibodies alone can trigger an immune response within the body. However, data is available that provides support for the notion that IgG4 can serve another specific function of controlling antigen recognition by IgE and consequently regulating anaphylactic reactions and IgE-mediated immunity. IgG4 can act as a blocking agent by preventing IgE from binding to targeted receptor sites and releasing histamine. We refer to this as the Immune Tolerance to IgE.

This test has been developed and its performance characteristics determined by Precision Point Diagnostics. It has not been cleared by the U.S. Food and Drug Administration.

PATIENT NAME:

LAURA HAMMETT

REQUISITION ID:

0061

DRAFT DATE:

8/18/2023

Physician Report: IgE/IgG4 Food Allergies

Understanding the Key

These results show the quantitative amount of antigen the patient is making in response to individual foods.

Percent Reactivity denotes how reactive the patient is compared to the population in general. For example, if the patient is 95%, they are more reactive than 95 % of the population.

Immune Tolerance denotes that IgG4 is greater than IgE and will block the IgE reaction. That is to say, the patient has gained tolerance to the food.

Patient Results

ANTIGEN	IgE (µg/mL)	RESULT	IgE % Reactivity	IMMUNE TOLERANCE
MEATS, DAIRY				
Beef	0.04		2%	YES
Casein	0.21	LOW	28%	YES
Cow's Milk	0.15	LOW	12%	YES
Goat's Milk	0.21	LOW	12%	YES
Pork	0.00		0%	
POULTRY				
Chicken	0.10		5%	YES
Egg Albumin	26.94	HIGH	95%	
Egg Yolk	1.23	LOW	65%	
Turkey	0.00		0%	
LEGUMES, BEANS				
Green Pea	0.66	LOW	47%	YES
Kidney Bean	0.55	LOW	62%	YES
Lima Bean	0.72	LOW	59%	YES
Navy Bean	1.74	LOW	63%	YES
Peanut	0.72	LOW	32%	YES
Soybean	3.90		0%	
String Bean	3.27	LOW	58%	YES
FUNGI				
Aspergillus Mix	0.27	LOW	23%	
Brewer's Yeast	0.15	LOW	14%	
Candida	0.72	LOW	40%	
Mushroom	0.66		10%	YES
FISH				
Codfish	0.27	LOW	19%	
Flounder	0.00		0%	
Halibut	0.00		0%	
Salmon	0.10	LOW	12%	
Tuna	0.21	LOW	20%	YES
SHELLFISH				
Garlic	0.10	LOW	13%	
Ginger	0.27	LOW	24%	YES
Hops	0.00		0%	
Mustard	0.21	LOW	22%	YES
Vanilla	0.32	LOW	44%	
HERBS, SPICES, SEASONINGS				
Black Pepper	0.21	LOW	31%	
Cinnamon	0.10		8%	
Garlic	0.10	LOW	13%	
Ginger	0.27	LOW	24%	YES
Hops	0.00		0%	
Mustard	0.21	LOW	22%	YES
Vanilla	0.32	LOW	44%	

ANTIGEN	IgG4 (µg/mL)	RESULT	IgG4 % Reactivity
MEATS, DAIRY			
Beef	0.79	LOW	40%
Casein	0.44	LOW	35%
Cow's Milk	1.41	LOW	54%
Goat's Milk	0.53	LOW	35%
Pork	0.13	LOW	14%
POULTRY			
Chicken	0.35	LOW	24%
Egg Albumin	8.94		10%
Egg Yolk	0.70	LOW	35%
Turkey	0.13		8%
LEGUMES, BEANS			
Green Pea	1.63	MODERATE	83%
Kidney Bean	16.55	HIGH	98%
Lima Bean	1.23	MODERATE	94%
Navy Bean	15.19	HIGH	98%
Peanut	0.79	LOW	39%
Soybean	3.30		2%
String Bean	25.22	HIGH	98%
FUNGI			
Aspergillus Mix	0.22	LOW	19%
Brewer's Yeast	0.00		0%
Candida	0.09		7%
Mushroom	1.81	MODERATE	77%
FISH			
Codfish	0.09		9%
Flounder	0.00		0%
Halibut	0.09	LOW	16%
Salmon	0.00		0%
Tuna	0.70	LOW	57%
SHELLFISH			
Garlic	0.044		4%
Ginger	0.53	LOW	38%
Hops	0.22	LOW	23%
Mustard	26.63	MODERATE	92%
Vanilla	0.18	LOW	23%
HERBS, SPICES, SEASONINGS			
Black Pepper	0.09		12%
Cinnamon	0.00		0%
Garlic	0.04		4%
Ginger	0.53	LOW	38%
Hops	0.22	LOW	23%
Mustard	26.63	MODERATE	92%
Vanilla	0.18	LOW	23%

This test has been developed and its performance characteristics determined by Precision Point Diagnostics. It has not been cleared by the U.S. Food and Drug Administration.

PATIENT NAME:

LAURA HAMMETT

REQUISITION ID:

██████████0061

DRAFT DATE:

8/18/2023

Physician Report: IgE/IgG4 Food Allergies

Patient Results

ANTIGEN	IgE (µg/mL)	RESULT	IgE % Reactivity	IMMUNE TOLERANCE
GRAINS, GRASSES				
Barley	0.72	LOW	71%	YES
Corn	0.38	LOW	25%	
Gluten	3.50	LOW	31%	YES
Oat	0.15	LOW	32%	
Rice	0.44	LOW	54%	
Rye	0.04		5%	
Whole Wheat	0.10		8%	
SEEDS, NUTS				
Almond	0.89	LOW	43%	YES
Cacao	0.27	LOW	46%	
Cashew	0.32	LOW	22%	YES
Coffee	0.32	LOW	37%	
Cottonseed	0.00		0%	
English Walnut	0.10		3%	
Flax Seed	0.00		0%	
Pecan	0.00		0%	
Sesame	0.00		0%	
FRUITS				
Apple	0.38	LOW	39%	
Avocado	0.10		3%	
Banana	0.04		5%	
Blueberry	0.55	LOW	32%	YES
Cantaloupe	0.27	LOW	22%	YES
Cherry	0.04		4%	YES
Coconut	0.27	LOW	23%	
Cucumber	0.04		0%	
Grapefruit	0.10	LOW	14%	
Grapes	0.10	LOW	12%	
Green Olive	0.15	LOW	12%	
Green Pepper	0.32	LOW	31%	
Honeydew	0.10		7%	
Lemon	0.04		0%	
Orange	0.10	LOW	16%	YES
Peach	0.21	LOW	24%	
Pear	0.00		0%	
Pineapple	0.04		2%	YES
Plum	0.00		0%	
Strawberry	0.00		0%	
Tomato	0.10	LOW	22%	
Watermelon	0.04		3%	YES
Yellow Squash	4.12	LOW	37%	YES
VEGETABLES				
Asparagus	0.10		7%	
Broccoli	0.38	LOW	26%	
Cabbage	0.10		0%	
Carrot	0.21	LOW	26%	
Cauliflower	0.44	LOW	65%	
Celery	0.04		3%	
Lettuce	0.21	LOW	22%	
Onion	0.04		2%	YES
Spinach	0.21	LOW	20%	YES
Sweet Potato	0.38	LOW	22%	YES
Tea	0.04		0%	
White Potato	0.44	LOW	17%	YES

ANTIGEN	IgG4 (µg/mL)	RESULT	IgG4 % Reactivity
GRAINS, GRASSES			
Barley	2.29	MODERATE	92%
Corn	0.26	LOW	24%
Gluten	50.18	HIGH	98%
Oat	0.13	LOW	37%
Rice	0.40	LOW	45%
Rye	0.00		0%
Whole Wheat	0.00		0%
SEEDS, NUTS			
Almond	1.06	LOW	53%
Cacao	0.00		0%
Cashew	1.59	MODERATE	78%
Coffee	0.26	LOW	33%
Cottonseed	0.00		0%
English Walnut	0.04		4%
Flax Seed	0.35	LOW	23%
Pecan	0.00		0%
Sesame	0.00		0%
FRUITS			
Apple	0.18	LOW	18%
Avocado	0.00		0%
Banana	0.00		0%
Blueberry	0.79	LOW	50%
Cantaloupe	0.31	LOW	22%
Cherry	0.04		3%
Coconut	0.04		2%
Cucumber	0.00		0%
Grapefruit	0.00		0%
Grapes	0.00		0%
Green Olive	0.04		3%
Green Pepper	0.18	LOW	29%
Honeydew	0.00		0%
Lemon	0.00		0%
Orange	0.31	LOW	44%
Peach	0.13		9%
Pear	0.00		0%
Pineapple	0.09	LOW	27%
Plum	0.00		0%
Strawberry	0.00		0%
Tomato	0.09		9%
Watermelon	0.04		5%
Yellow Squash	4.62	LOW	52%
VEGETABLES			
Asparagus	0.04		5%
Broccoli	0.13		7%
Cabbage	0.00		0%
Carrot	0.09	LOW	13%
Cauliflower	0.35	LOW	48%
Celery	0.00		0%
Lettuce	0.13	LOW	17%
Onion	0.18	LOW	39%
Spinach	0.22	LOW	29%
Sweet Potato	0.57	LOW	48%
Tea	0.00		0%
White Potato	0.84	LOW	59%

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P88-DIY (IgG/C3d)

A Targeted Approach to Wellness

PATIENT INFO

NAME: LAURA HAMMETT
REQUISITION ID: ██████████0061
DOB: ████████/1962
SAMPLE DATE: 7/30/2023
RECEIVE DATE: 8/2/2023
DRAFT DATE: 8/18/2023

CLINIC INFO

SCROGGINS FAMILY MEDICINE
ADDRESS: 1355 Dave Ward Drive
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Conway, AR 72034
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Physician Report: IgG/C3d Food Sensitivities

Dietary Antigen Exposure by Food Group

	IgG
Meats, Dairy	MODERATE
Poultry	MODERATE
Legumes, Beans	MODERATE
Fungi	LOW
Fish	MODERATE
Shellfish	MODERATE
Herbs, Spices,	LOW
Grains, Grasses	LOW
Seeds, Nuts	LOW
Fruits	MODERATE
Vegetables	MODERATE



Dietary Antigen Exposure by Food Group

In this test, a human serum sample is probed for the presence of IgG antibodies which have an exact affinity for specific dietary allergens. Dietary allergens are clustered by the food groups shown in the table and graph above. The quantitative summation of the IgG results within the offending food groups are expressed graphically. The exclusion of the offending food group(s) from the diet has been shown to reduce the severity of symptoms associated with food allergies.

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Understanding the Key

These results show the quantitative amount of antigen the patient is making in response to individual foods.

Percent Reactivity denotes how reactive the patient is compared to the population in general. For example, if the patient is 95%, they are more reactive than 95 % of the population.

If a patient has both IgG and C3d the reaction will be 1000 fold or more greater than just having an IgG reaction alone. C3d

Patient Results

ANTIGEN	IgG (µg/mL)	RESULT	IgG % Reactivity
MEATS, DAIRY			
Beef	35.71	HIGH	97%
Casein	0.00		0%
Cow's Milk	108.81	LOW	70%
Goat's Milk	0.00		0%
Pork	15.94	MODERATE	86%
POULTRY			
Chicken	0.00		0%
Egg Albumin	83.99	MODERATE	80%
Egg Yolk	15.02	MODERATE	77%
Turkey	8.12	HIGH	96%
LEGUMES, BEANS			
Green Pea	13.18	HIGH	95%
Kidney Bean	4.90	LOW	59%
Lima Bean	3.07	LOW	44%
Navy Bean	8.12	LOW	63%
Peanut	9.50	MODERATE	85%
Soybean	32.03	HIGH	91%
String Bean	15.48	MODERATE	80%
FUNGI			
Aspergillus Mix	11.34	LOW	15%
Brewer's Yeast	1.23	LOW	23%
Candida	4.90		6%
Mushroom	43.07	LOW	66%
FISH			
Codfish	17.78	HIGH	96%
Flounder	3.99	LOW	67%
Halibut	4.90	MODERATE	86%
Salmon	0.00		0%
Tuna	1.23	LOW	43%
SHELLFISH			
Clam	35.71	HIGH	97%
Crab	0.31		11%
Lobster	6.74	HIGH	90%
Scallops	1.23	LOW	44%
Shrimp	0.00		0%
HERBS, SPICES, SEASONINGS			
Black Pepper	11.34	LOW	49%
Cinnamon	0.00		0%
Garlic	0.00		0%
Ginger	10.88	LOW	55%
Hops	10.42	MODERATE	89%
Mustard	2.61	LOW	48%
Vanilla	33.87	MODERATE	80%

ANTIGEN	C3d (µg/mL)	RESULT	C3d % Reactivity
MEATS, DAIRY			
Beef	0.00		0%
Casein	0.04		7%
Cow's Milk	0.66	LOW	57%
Goat's Milk	0.00		0%
Pork	0.85	LOW	74%
POULTRY			
Chicken	0.50	LOW	65%
Egg Albumin	4.17	HIGH	96%
Egg Yolk	0.16	LOW	30%
Turkey	0.00		0%
LEGUMES, BEANS			
Green Pea	0.16	LOW	32%
Kidney Bean	0.43	MODERATE	83%
Lima Bean	0.58	MODERATE	80%
Navy Bean	0.73	MODERATE	82%
Peanut	0.62	LOW	61%
Soybean	2.82		2%
String Bean	0.43	LOW	73%
FUNGI			
Aspergillus Mix	0.00		0%
Brewer's Yeast	0.12	LOW	39%
Candida	0.04		7%
Mushroom	8.39	LOW	70%
FISH			
Codfish	0.12	LOW	42%
Flounder	0.00		0%
Halibut	0.00		0%
Salmon	0.04	LOW	14%
Tuna	0.04		7%
SHELLFISH			
Clam	1.86	MODERATE	94%
Crab	0.54	LOW	68%
Lobster	0.12	LOW	28%
Scallops	0.46	LOW	70%
Shrimp	0.00		0%
HERBS, SPICES, SEASONINGS			
Black Pepper	0.08	LOW	17%
Cinnamon	0.12	LOW	44%
Garlic	0.00		0%
Ginger	0.19	LOW	32%
Hops	0.00		0%
Mustard	0.08	LOW	33%
Vanilla	0.00		0%

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Physician Report: IgG/C3d Food Sensitivities

Patient Results

ANTIGEN	IgG (µg/mL)	RESULT	IgG % Reactivity
GRAINS, GRASSES			
Barley	2.15	LOW	23%
Corn	4.90	MODERATE	81%
Gluten	338.24	LOW	57%
Oat	0.31	LOW	26%
Rice	3.07	MODERATE	81%
Rye	4.44	MODERATE	81%
Whole Wheat	0.77	LOW	19%
SEEDS, NUTS			
Almond	10.88	MODERATE	92%
Cacao	0.00		0%
Cashew	2.15	LOW	33%
Coffee	5.36	LOW	39%
Cottonseed	0.77	LOW	19%
English Walnut	6.28	LOW	11%
Flax Seed	2.61	LOW	50%
Pecan	0.00		0%
Sesame	0.00		0%
FRUITS			
Apple	3.07	MODERATE	77%
Avocado	0.00		0%
Banana	0.00		0%
Blueberry	28.35	HIGH	99%
Cantaloupe	8.12	MODERATE	94%
Cherry	0.00		0%
Coconut	0.00		0%
Cucumber	0.00		0%
Grapefruit	0.00		0%
Grapes	0.00		0%
Green Olive	0.00		0%
Green Pepper	6.28	MODERATE	93%
Honeydew	0.00		0%
Lemon	0.00		0%
Orange	0.00		0%
Peach	1.69	LOW	56%
Pear	0.00		0%
Pineapple	0.77	LOW	43%
Plum	1.69	LOW	64%
Strawberry	7.20	HIGH	93%
Tomato	14.56	HIGH	95%
Watermelon	6.28	MODERATE	82%
Yellow Squash	59.62	HIGH	>99%
VEGETABLES			
Asparagus	5.36	LOW	60%
Broccoli	0.00		0%
Cabbage	0.00		0%
Carrot	1.23	LOW	46%
Cauliflower	5.36	HIGH	95%
Celery	4.90	MODERATE	84%
Lettuce	0.00		0%
Onion	7.20	HIGH	96%
Spinach	9.04	HIGH	95%
Sweet Potato	12.26	LOW	53%
Tea	0.00		0%
White Potato	10.42	LOW	14%

ANTIGEN	C3d (µg/mL)	RESULT	C3d % Reactivity
GRAINS, GRASSES			
Barley	0.89	MODERATE	90%
Corn	0.16	LOW	45%
Gluten	0.58	LOW	61%
Oat	0.12	LOW	45%
Rice	0.00		0%
Rye	0.00		0%
Whole Wheat	0.97	HIGH	95%
SEEDS, NUTS			
Almond	0.35	LOW	41%
Cacao	0.00		0%
Cashew	0.00		0%
Coffee	0.70	LOW	65%
Cottonseed	0.00		0%
English Walnut	0.73		7%
Flax Seed	0.39	LOW	51%
Pecan	0.73	MODERATE	83%
Sesame	0.16	LOW	61%
FRUITS			
Apple	0.00		0%
Avocado	0.62		2%
Banana	0.16	LOW	54%
Blueberry	1.82	LOW	45%
Cantaloupe	0.19	LOW	50%
Cherry	0.04	LOW	15%
Coconut	0.04		5%
Cucumber	0.16	LOW	62%
Grapefruit	0.16	LOW	65%
Grapes	0.04	LOW	18%
Green Olive	0.00		0%
Green Pepper	0.12	LOW	35%
Honeydew	0.39	MODERATE	79%
Lemon	0.00		0%
Orange	0.08	LOW	15%
Peach	0.12	LOW	31%
Pear	0.00		0%
Pineapple	0.00		0%
Plum	0.19	LOW	51%
Strawberry	0.04	LOW	16%
Tomato	0.16	LOW	45%
Watermelon	0.73	MODERATE	89%
Yellow Squash	7.23	LOW	46%
VEGETABLES			
Asparagus	0.12	LOW	30%
Broccoli	0.85	MODERATE	77%
Cabbage	0.35		0%
Carrot	0.00		0%
Cauliflower	0.27	LOW	67%
Celery	0.08	LOW	19%
Lettuce	0.16	LOW	31%
Onion	0.73	MODERATE	88%
Spinach	0.23	LOW	54%
Sweet Potato	5.06	MODERATE	87%
Tea	0.08	LOW	46%
White Potato	6.26	MODERATE	78%

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Physician Report: Biogenic Compounds List

This table shows grouping of reactions based on IgE, IgG and C3d in categories that are generally considered nonimmunogenic. If many reactions show up in a column, this may provide evidence to consider diets that remove foods that are high in these biogenic compounds, even those not included on this test, because the immune system has a pattern of reacting to foods in this category.

DIETARY ANTIGEN	Oxalates	Amines	Glutamate	Histamine	Lectins	Nitrite	FOD-MAP	Phenol	Salicylates
Almond		M							M
Apple							M	M	
Asparagus									
Avocado									
Banana									
Barley							M		
Blueberry	H								
Broccoli			M						
Cabbage									
Casein									
Cashew							M		
Cauliflower							H		
Celery						M			
Coconut									
Coffee									
Corn			M						
Grapefruit									
Kidney Bean	H			H	H		H		
Lettuce									
Mushroom			M				M		
Navy Bean	H			H	H		H		
Onion							H	H	
Orange									
Peach									
Peanut					M			M	
Pear									
Pineapple									
Plum									
Shrimp									
Soybean	H			H			H		
Spinach	H					H			
Strawberry									H
Tea									
Tomato		H	H	H	H			H	H
Turkey								H	
Watermelon							M		
White Potato					M				
Whole Wheat	H						H		



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