

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

JASON LYNCH

PLAINTIFF

V.

Case No. 4:24-CV-00740-LPR-BBM

DOES, Pill Nurses 1–3; CLAYTON
EDWARDS, Captain; HANNAH ROSS,
Lt.; SWINDLE, Sgt.; HALEY
WORKMAN, Sgt.; ZACHARY
RODGERS, Sgt.; DONALD WOOD, CO;
CODY SILER, Sgt.; CONNOR
GOODWIN, CO; ASHLEY WATTS,
Nurse; KAITLYN SMITH, Nurse; and
TURN KEY HEALTH CLINICS, LLC,
d/b/a TK HEALTH, Medical Contractor

DEFENDANTS

ORDER

I. INTRODUCTION

On August 30, 2024, Plaintiff Jason Lynch—at that time, an inmate in the White County Detention Facility (“WCDC”)—filed a *pro se* Complaint under 42 U.S.C. § 1983, alleging a litany of claims against numerous Defendants. (Doc. 1). Addendums and Amended complaints followed. (Docs. 3, 8, 11, 12, 14–15, 17, 20, 24, 45). After the Court screened the operative Third Amended Complaint, (Doc. 45), Lynch was allowed to proceed on the following claims that allegedly occurred during his WCDC incarceration from June 9, 2024, to September 7, 2024:

- a. medical-deliberate-indifference claims against Nurse Ashley Watts and Captain Clayton Edwards, in their individual capacities only, based on a delay in Lynch receiving his HIV medication;

- b. crushed-medication medical-deliberate-indifference claims against Edwards, Nurse Kaitlyn Smith, Watts, and Pill Nurses 1, 2, and 3 in their individual capacities only;
- c. First Amendment interference-with-mail claims against Edwards, Lt. Hannah Ross, Sgt. Cody Siler, and C.O. Conner Goodwin in their individual capacities only;
- d. failure-to-protect claims against Sgt. Zachary Rodgers and Sgt. Swindle, in their individual capacities only, for telling the F Pod inmates that the shakedowns were Lynch's fault;
- e. excessive-force claim against Rodgers, in his individual capacity only, for the alleged arm-grab;
- f. equal-protection claim against Edwards, in his individual capacity only, based on Lynch's placement in medical lockdown;
- g. individual-capacity retaliation claims: (1) against Edwards for harassment of Lynch's wife; (2) against Edwards, Ross, Siler, and Goodwin for interference with Lynch's mail; (3) against C.O. Donald Wood for denying Lynch toilet paper; (4) against Rodgers, Swindle, and Sgt. Haley Workman for telling F Pod inmates that it was Lynch's fault they were not receiving yard call; (5) against Edwards, Rodgers, Swindle, and Wood for subjecting Lynch to numerous shakedowns with strip and visual cavity searches, and against Rodgers and Swindle for telling the F Pod inmates the shakedowns were Lynch's fault; and (6) against Edwards for placing Lynch in medical lockdown;
- h. conspiracy claims against Edwards, Rodgers, Ross, Siler, Goodwin, Wood, Swindle, and Workman in their individual capacities only; and
- i. official-capacity claims against Edwards and Turn Key Health Clinics, LLC for the alleged policy and practice of crushing Lynch's medication.

(Docs. 71, 80).

On May 26, 2026, Lynch filed a "MOTION FOR LEAVE TO FILE SUPPLEMENTAL CLAIM AND SUPPLEMENTAL PLEADING PURSUANT TO FED. R. CIV. P. 15(d)." (Doc. 178). The Court construes this as a Motion for Leave to

Amend Complaint under Federal Rule of Civil Procedure 15(a)(2),¹ which, for the following reasons, is denied.

II. DISCUSSION

The federal rules state that the Court should freely give leave to amend “when justice so requires.” FED. R. CIV. P. 15(a)(2). Leave to amend, however, may appropriately be denied where there are “compelling reasons,” such as “undue delay, bad faith on the part of the moving party, futility of the amendment or unfair prejudice to the opposing party.” *Hammer v. City of Osage Beach*, 318 F.3d 832, 844 (8th Cir. 2003); *Crest Construction II, Inc. v. Doe*, 660 F.3d 346, 358–59 (8th Cir. 2011). Although Lynch does not attach a proposed amended complaint to his Motion for Leave to Amend in accordance with LOCAL RULE 5.5(e), he outlines the new allegations he would like to bring.

In his Motion for Leave to Amend, Lynch alleges that, while he was confined in WCDC, he “was not transported to at least two critical civil court proceedings” in *Oak Meadow Farms LLC v. Jason Lynch*, 73CV-24-698 (White Cnty, Ark. July 29, 2024).² (Doc. 178 at 1–2). He claims that, as a result of the missed court dates, a default judgment was issued against him, and he lost “more than \$75,000.00 in personal property and possessory interests.” *Id.*

¹ Although Lynch states that he would like to pursue a “supplemental” claim, that term is used to describe “any transaction, occurrence, or event that happened *after* the date of the pleading to be supplemented.” FED. R. CIV. P. 15(d) (emphasis added). Instead, Lynch seeks to pursue allegations that occurred during his 2024 WCDC incarceration, *i.e.*, during the same time frame as the allegations in his operative pleading. *See* (Doc. 178 at 1).

² The Court takes judicial notice of the state court proceedings publicly available on the Arkansas Judiciary’s website: caseinfo.arcourts.gov

He claims further that “White County officials,” either intentionally, negligently, or with deliberate indifference, failed to transport him to the court proceedings. (Doc. 178 at 3). He asserts that this denied him access to the courts and resulted in a deprivation of property and a denial of due process. *Id.* He seeks compensatory and punitive damages, costs, and declaratory relief. *Id.* at 5.

The Court finds it would be futile to allow Lynch to amend his operative complaint to add these new allegations, first, because he has alleged no reasonable basis to believe they arise “out of the same transaction, occurrence, or series of transactions or occurrences” as the allegations in his original complaint or concern common questions of fact or law. FED. R. CIV. P. 20(a)(2). In other words, he has alleged no *facts* suggesting the lack of transportation arose from the same “conspiracy” claim he is actively pursuing in this litigation. Moreover, Lynch’s new allegations against “White County officials” are too vague and conclusory to show how any Defendant, through their own individual actions, violated the Constitution. *Ashcroft v. Iqbal*, 556 U.S. 662, 676 (2009).

More fundamentally, Lynch’s new allegations fail to state a claim for relief. Lynch’s new claims rest, primarily, on the notion that he was denied access to the courts. While in the WCDC, Lynch, like all inmates, had “a constitutional right of access to the courts.” *Bounds v. Smith*, 430 U.S. 817, 821 (1977) (abrogated on other grounds). But that right is limited; inmates are not guaranteed the ability to file “everything from shareholder derivative actions to slip-and-fall claims.” *Lewis v. Casey*, 518 U.S. 343, 355 (1996). Instead, the First Amendment gives inmates the right to access the courts “to attack their sentences, directly or collaterally” or to “challenge the conditions of their confinement.”

Lewis, 518 U.S. at 355; *Johnson v. Avery*, 393 U.S. 483, 489–90 (1969). The *Oak Meadow Farms, LLC* litigation concerned neither of those things—instead, it was landlord-tenant dispute (unlawful detainer). Complaint, *Oak Meadow Farms, LLC* (July 29, 2024). Thus, Lynch had no constitutional right to access the courts on that litigation during his incarceration in WDCD, and it would be futile to allow him to add that claim (or the derivative deprivation-of-property and due-process claims) to the instant action.³

III. CONCLUSION

IT IS THEREFORE ORDERED THAT:

1. Lynch’s Motion for Leave to Amend Complaint, (Doc. 178), is DENIED as futile.
2. A scheduling order lifting the exhaustion-discovery stay and setting deadlines for merits discovery and dispositive motions will issue.

SO ORDERED this 29th day of June, 2026.


UNITED STATES MAGISTRATE JUDGE

³ The Court also notes that Lynch’s new failure-to-transport allegations mischaracterize the relevant state-court litigation and are so frivolous that Lynch’s Motion to Amend borders on vexatious. A review of the *Oak Meadow Farms, LLC* docket reveals that there were no hearings held in that case. Thus, there were no “critical” court proceedings, (Doc. 178 at 1–2), for any WDCD official to transport Lynch to.

Moreover, Lynch *and* his wife were named defendants in the litigation. *See* Complaint, *Oak Meadow Farms, LLC* (July 29, 2024). Lynch’s wife was served with both summonses. Affidavit(s) of Service, *Oak Meadow Farms, LLC* (Aug. 8, 2024). Default judgment was entered only after both Lynch and his wife failed to file responsive pleadings or otherwise appear in the action. Default Judgment, *Oak Meadow Farms, LLC* (Oct. 7, 2024).