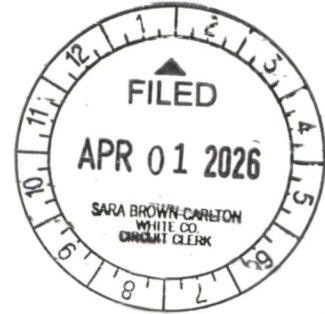


SUBJECT: RE: Omnibus Filing Notice - Lynch v. White County
DATE: 01/04/2026 10:36:02 PM



IN THE CIRCUIT COURT OF WHITE COUNTY, ARKANSAS

OMNIBUS FILING NOTICE TO CIRCUIT COURT CLERK

(Pro Se Filing Initiation of State Law & State Tort Action)

TO:
Clerk of the Circuit Court
White County Courthouse
White County, Arkansas

FROM:
Jason Matthew Lynch
Reg. No. 07405-510
Plaintiff, Pro Se
Currently incarcerated at FCI El Reno, Oklahoma

NOTICE OF PRO SE FILING AND SUBMISSION OF ATTACHED PLEADINGS

COMES NOW Jason Matthew Lynch, appearing pro se, and respectfully provides this Omnibus Filing Notice to the Clerk of the White County Circuit Court to formally notify the Court and Clerk of the simultaneous filing of multiple initiating pleadings and motions commencing a State Law Violations and Arkansas State Torts action in this Court.

This Notice is intended to ensure clarity of the record, proper docketing, and preservation of Plaintiff's rights.

...IO SE STATUS AND RIGHT TO FILE

1. Mr. Lynch is filing this action pro se, as expressly permitted under Arkansas law.

2. Arkansas courts have long recognized the right of an individual to represent himself in civil proceedings.

Ark. R. Civ. P. 11(a)

Faretta v. California, 422 U.S. 806 (1975) (recognizing the fundamental right of self-representation)

Gibson v. City of Trumann, 311 Ark. 561, 845 S.W.2d 515 (1993)

3. Mr. Lynch is currently indigent and incarcerated, and is therefore filing contemporaneously a Motion to Proceed In Forma Pauperis (IPF) and supporting IPF Affidavit, pursuant to:

Ark. Code Ann. § 16-68-301 et seq.;

Ark. R. Civ. P. 72.

II. DOCUMENTS SUBMITTED WITH THIS OMNIBUS FILING NOTICE

Attached to and submitted contemporaneously with this Omnibus Filing Notice are the following documents, all intended to be filed and docketed together as initiating pleadings and motions:

1. Motion to Proceed In Forma Pauperis (IPF)

2. Affidavit in Support of IPF Motion

3. State Law Violations & Arkansas State Torts Complaint

4. Plaintiff Lynch's 21-Part Supporting Legal Brief

5. Motion for Judicial Recusal

6. Motion for Change of Venue

7. Affidavit Pursuant to 28 U.S.C. § 144 (submitted in support of recusal grounds and to preserve federal issues)

8. Medical Report(s) supporting claims of injury and damages

9. Motion for Order Compelling Defendants to Preserve Evidence in their sole custody and control prior to any venue transfer

Each document is intentionally filed together to ensure the Court has full context of the claims, jurisdictional basis, procedural posture, and urgent preservation issues.

III. BASIS FOR FILING INITIALLY IN WHITE COUNTY CIRCUIT COURT

4. This action is properly filed in White County Circuit Court because:

- a. The events giving rise to the claims occurred in White County, Arkansas;
- b. The primary Defendants include White County, the White County Jail, and entities and officials operating within White County;
- c. Venue is proper under:

Ark. Code Ann. § 16-60-101;

Ark. Code Ann. § 16-60-104;

Ark. R. Civ. P. 82.

Plaintiff has a clear legal right to file in the county where the acts, omissions, and injuries occurred, notwithstanding any recent request for venue change.

IV. REASON FOR IMMEDIATE MOTIONS FOR RECUSAL AND VENUE CHANGE

6. Mr. Lynch is filing in White County first, as required by Arkansas venue statutes, in order to properly invoke the Court's jurisdiction.

7. Immediately upon filing, Plaintiff seeks:

Judicial recusal, and

Change of venue,

due to:

Demonstrated conflicts of interest;

The involvement of county officials, contractors, and policies;

Reasonable appearance of partiality;

Concerns regarding local prejudice and institutional entanglement.

kansas law expressly allows a litigant to file in the proper court and then seek recusal and venue change without waiving rights:

Ark. Code of Judicial Conduct Rule 2.11;

Ark. R. Civ. P. 12;

Ark. Code Ann. § 16-13-214;

Ferguson v. State, 2016 Ark. 319.

9. Filing first and moving for recusal and venue change thereafter is procedurally proper, preserves jurisdiction, and protects due process.

V. PRESERVATION OF EVIDENCE PRIOR TO ANY TRANSFER

10. Plaintiff has also filed a Motion for an Order to Preserve Evidence because:

Material evidence is in the exclusive custody and control of Defendants;

Defendants have failed to respond to multiple Arkansas FOIA requests;

There is a credible and imminent risk of spoliation;

Much of the evidence (video, electronic medical records, logs) is subject to routine deletion.

11. Arkansas courts have inherent authority to issue preservation orders to protect the integrity of proceedings:

Goff v. Harold Ives Trucking Co., 342 Ark. 143 (2000);

Ark. R. Civ. P. 26 & 37.

12. Preservation is especially critical before any venue transfer, to prevent loss or destruction of evidence during administrative transition.

REQUEST TO THE CLERK

Plaintiff respectfully requests that the Clerk:

1. Accept this Omnibus Filing Notice and all attached pleadings for filing;

2. Pocket each attached document appropriately;

3. Assign a case number;

4. Present the IPF Motion to the Court for consideration; and

5. Ensure the record reflects that all documents were submitted contemporaneously.

CONCLUSION

This Omnibus Filing Notice is submitted in good faith, with respect for the Court, and for the sole purpose of preserving Plaintiff's constitutional and statutory rights while ensuring clarity of the record:

Plaintiff thanks the Clerk for their attention and professionalism.

Respectfully submitted,

Jason Matthew Lynch
Reg. No. 07405-510
Plaintiff, Pro Se
FCI El Reno, Oklahoma

