

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

DEC 29 2025

TAMMY H. DOWNS, CLERK
By:  DEPT. CLERK

SUBJECT: RE: Motion of Extension of time to file objections
DATE: 12/19/2025 10:36:02 PM

2025 DEC 29 A 10:42

TAMMY H. DOWNS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

Jason Matthew Lynch, Reg. No. 07405-510
Plaintiff,

v.

John Does, et al.,
Defendants.

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

PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO FILE OBJECTIONS TO PARTIAL DISPOSITION

Plaintiff Jason Matthew Lynch, proceeding pro se and currently incarcerated at FCI El Reno, respectfully moves this Court for an extension of time to file objections to the Partial Disposition entered on December 15, 2025, pursuant to Federal Rules of Civil Procedure 6(b)(1), 72(b)(2), and 28 U.S.C. § 636(b)(1). In support thereof, Plaintiff states as follows:

I. RECENT NOTICE OF THE PARTIAL DISPOSITION

1. Plaintiff was only just made aware of the Court's Partial Disposition entered on December 15, 2025, when his wife checked PACER on December 18, 2025 and informed him by correspondence.

2. As a federal prisoner, Plaintiff does not have direct PACER access and must rely entirely on mail delivery and third-party notification, which courts routinely recognize as a valid basis for extensions.
See *Houston v. Lack*, 487 U.S. 266, 270 72 (1988); *Faile v. Upjohn Co.*, 988 F.2d 985, 987 (9th Cir. 1993).

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II. INTENT TO FILE OBJECTIONS

3. Plaintiff intends to file objections, and those objections are forthcoming.

4. Plaintiff seeks sufficient time to ensure his objections are complete, precise, and fully supported by the record, as contemplated by Rule 72(b) and § 636(b)(1), which provide for meaningful de novo review by the District Court.

III. INCARCERATION AND MAIL DELAYS AT FCI EL RENO

5. Plaintiff is a federal prisoner, and the standard 14-day objection period is barely sufficient and often insufficient when considering:

Delays in incoming legal mail

Delays in outgoing legal mail

Processing by the institutional mail room

Limited law library access

Institutional movement and lockdown constraints

6. Courts have repeatedly held that incarcerated litigants are entitled to reasonable accommodations for mail delays and institutional barriers.

See *Bounds v. Smith*, 430 U.S. 817, 824 25 (1977); *Lewis v. Casey*, 518 U.S. 343, 351 (1996); *Fassett v. Commissioner*, 813 F.2d 304, 307 (10th Cir. 1987).

IV. HOLIDAY MAIL DELAYS (CHRISTMAS & NEW YEAR)

7. The objection period falls directly over the Christmas and New Year holidays, during which both:

United States Postal Service delivery, and

FCI El Reno's internal mail room operations

are notoriously delayed.

8. Courts routinely find holiday mail disruptions to constitute good cause and excusable neglect under Rule 6(b)(1). See *Pioneer Inv. Servs. Co. v. Brunswick Assocs. Ltd. P'ship*, 507 U.S. 380, 395 (1993).

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V. NEED TO REVIEW PRIOR FILINGS AND RECORD

9. Plaintiff requires additional time to review his prior filings, including but not limited to:

Supporting briefs submitted with prior amended complaints

Medical documentation and constitutional arguments

Filings that may not have been expressly addressed in the Partial Disposition

10. Plaintiff intends to identify and cite these filings specifically in his objections to ensure no issues were overlooked or misconstrued, as required for meaningful appellate preservation.

See *United States v. Lothridge*, 324 F.3d 599, 600 01 (8th Cir. 2003).

VI. PRIOR COURT ASSURANCES REGARDING MAIL DELAYS

11. Plaintiff previously filed motions requesting extended and standing extensions of time due to documented mail room delays at FCI El Reno.

12. In response, the Court indicated that it would take the mail room delays at FCI El Reno into consideration for future deadlines.

13. Plaintiff respectfully reminds the Court of that assurance and requests that it be applied here, consistent with principles of fundamental fairness and access to courts.

See *Haines v. Kerner*, 404 U.S. 519, 520 21 (1972).

VII. REQUESTED EXTENSION

14. Plaintiff respectfully requests a twenty (20) day extension of time to file his objections, or such other period as the Court deems proper.

15. This request is made in good faith, for purposes of adequate review, and will not prejudice Defendants, particularly at this preliminary stage of litigation.

See *Foman v. Davis*, 371 U.S. 178, 182 (1962).

VIII. CONCLUSION AND GRATITUDE

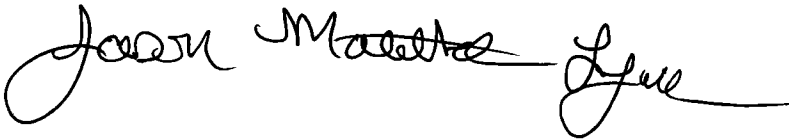
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16. Plaintiff wishes to express his sincere gratitude to the Court for the time, care, and attention devoted to this case. Plaintiff is fully aware that this matter involves extensive filings and complex constitutional issues, and he is deeply appreciative of every moment the Court has devoted to reviewing the record.

WHEREFORE, Plaintiff respectfully requests that this Court grant his Motion for Extension of Time and allow him twenty (20) additional days, or such other time as the Court deems just and proper, to file objections to the Partial Disposition entered on December 15, 2025.

Respectfully submitted,

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

A handwritten signature in black ink that reads "Jason Matthew Lynch". The signature is written in a cursive, flowing style with a long horizontal line extending from the end.