

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

JASON MATTHEW LYNCH	)	Case No. 4:26-cv-00118-JM-JJV
Plaintiff,	)	
v.	)	
WHITE COUNTY, ARKANSAS; et al.	)	
Defendants.	)	

**PLAINTIFF’S MOTION FOR CLARIFICATION, AUTHORIZATION OF NARROWED
DOE-IDENTIFICATION DISCOVERY, AND LIMITED EXTENSION OF DEADLINE**

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully moves for: (1) clarification of the Court’s July 31, 2026 Text Order, Docket No. 117; (2) authorization to serve narrowly tailored Doe-identification discovery limited to Plaintiff’s surviving conditions-of-confinement claims; and (3) a limited extension of the September 1, 2026 Doe-identification deadline.

Plaintiff accepts the Court’s determination that his prior discovery requests were overbroad. He does not seek sanctions, contend that Defendants were in default, or challenge the Court’s authority to manage discovery. He seeks only a practical procedure allowing him to comply with the Court’s direction and identify defendants whose names and assignments are in Defendants’ possession.

I. BACKGROUND

1. The operative claims concern alleged conditions of confinement at the White County Detention Center between **June 9, 2024, and September 9, 2024**. The conditions include sewage, feces, blood, mold, sleeping without a bed or on concrete, unsafe water, inadequate food, denial of exercise or yard call, inadequate hygiene supplies, and the allegedly malfunctioning Cell F-4 door lock.
2. On July 20, 2026, Plaintiff served a Doe-identification discovery packet electronically on defense counsel. Under Fed. R. Civ. P. 33(b)(2) and Fed. R. Civ. P. 34(b)(2)(A), responses ordinarily were due approximately thirty days after service.

3. On July 31, 2026, before that response period expired, the Court denied Plaintiff's prior motion to compel and motion for extension. The Court found the requests overbroad and directed Plaintiff to narrow them to the relevant period and provide information concerning what each Doe allegedly did, where the conduct occurred, and the approximate date or time. The Court also directed the parties to meet and confer.
4. Plaintiff acknowledges that his prior motion to compel was premature as to the July 20 discovery packet. Plaintiff does not ask the Court to compel responses to that packet or impose sanctions.
5. The remaining concern is timing. The ordinary response period ends approximately thirteen days before the September 1 Doe-identification deadline. Plaintiff cannot reasonably review the responses, connect names to specific incidents, confer about deficiencies, prepare a substitution motion or amended pleading, and begin service within that interval.

II. CLARIFICATION REQUESTED

Plaintiff respectfully requests clarification that he may serve a replacement discovery packet limited to information sufficient to identify persons connected to specific conditions-of-confinement incidents.

The proposed discovery will:

- * concern only June 9 through September 9, 2024;
- * concern only the surviving conditions-of-confinement claims;
- * identify the alleged condition, location, and approximate date or short date range;
- * request only names, titles, assignments, and records sufficient to connect a person to the incident;
- * exclude medical-treatment claims, access-to-courts claims, retaliation, religious claims, mail claims, and unrelated matters; and

- * exclude complete personnel files and facility-wide employee lists.

Plaintiff does not seek clarification concerning medical defendants or claims reserved for another action.

III. PROPOSED NARROWED DISCOVERY

Plaintiff proposes serving no more than eight interrogatories and eight document requests. Each request will be incident-specific and will seek only information sufficient to identify the relevant Doe defendant.

A. Sanitation, Sewage, Blood, and Mold

For each specific grievance, request, incident report, inspection, or maintenance record concerning sewage, feces, blood, black mold, shower backups, or sanitation hazards in Plaintiff's housing area, Defendants would identify:

- a. the correctional officer and shift supervisor assigned to the relevant location and shift;
- b. each person who received, routed, investigated, or responded to the complaint; and
- c. the specific record connecting each person to the incident.

The relevant location is limited to Pod F, the Pod F dayroom and shower area, Cell F-4, or a temporary housing location documented in Plaintiff's records.

B. Sleeping Surface or Bed Assignment

For the intake date and any documented period during which Plaintiff lacked an assigned bunk, Defendants would identify:

- a. the employee responsible for Plaintiff's housing or bunk assignment;
- b. the supervisor assigned to the relevant housing unit; and
- c. the housing, classification, or bunk record identifying those persons.

C. Cell F-4 Door Lock

For each complaint, work order, incident report, or grievance concerning the Cell F-4 lock, Defendants would identify:

- a. the correctional officer or supervisor who received notice;
- b. the maintenance employee assigned to inspect or repair the lock; and
- c. the specific housing, control-room, maintenance, or grievance record connecting each person to the incident.

D. Food and Water

For each specific food or water complaint identified in Plaintiff's records, Defendants would identify:

- a. the employee assigned to distribute or supervise the relevant meal or water response;
- b. the employee who received or investigated the complaint; and
- c. the specific meal, maintenance, grievance, or incident record identifying each person.

E. Recreation or Yard Call

For each documented cancellation or denial of recreation or yard call affecting Plaintiff, Defendants would identify:

- a. the officer assigned to supervise the relevant housing unit or recreation period;
- b. the person who authorized, recorded, or approved the cancellation or denial; and
- c. the recreation log, movement record, post assignment, or supervisory record identifying those persons.

F. Grievance and Request Routing

For each grievance, kiosk request, or maintenance request concerning the conditions listed above, Defendants would produce or identify:

- a. the person who received or routed the submission;
- b. the person who investigated, answered, approved, or closed it; and
- c. the relevant audit trail, routing history, username, or assignment record.

Plaintiff requests only records sufficient to identify those persons, not unrelated grievance files or complete system data.

IV. GOOD CAUSE FOR A LIMITED EXTENSION

Fed. R. Civ. P. 6(b)(1)(A) permits the Court, for good cause, to extend a deadline before it expires. Fed. R. Civ. P. 16(b)(4) likewise permits modification of a scheduling order for good cause. The discovery process required by Order No. 117 creates good cause here.

The identifying information is primarily controlled by Defendants. Plaintiff does not possess WCDC's:

- * shift and post assignments;
- * housing and bunk records;
- * grievance-routing audit trails;
- * maintenance and work-order records;
- * recreation logs;
- * food-service assignments; or
- * control-room and lock records.

The proposed extension is not based on inactivity. Plaintiff contacted counsel, explained that generalized employee lists did not identify the persons connected to particular incidents, served formal discovery, and acknowledges that his prior motion to compel was premature.

The Eighth Circuit has recognized that when an unidentified defendant may be identified through information controlled by defendants, limited disclosure and amendment may be appropriate

rather than dismissal solely because the person's name is initially unknown. *Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985). Plaintiff understands that this principle does not excuse compliance with the Court's discovery limits. It supports only a reasonable opportunity to use targeted discovery.

A deadline tied to the response date would avoid unnecessary delay and provide a measurable endpoint. Plaintiff proposes either:

- a. thirty days after Defendants serve responses to the Court-approved narrowed discovery; or
- b. October 2, 2026, if the Court prefers a fixed date.

The requested extension would allow Plaintiff to review the responses, identify the Doe defendants, prepare the required substitution or amendment, and provide available service information.

V. MEET AND CONFER

Plaintiff is prepared to meet and confer promptly by telephone, video conference, or another method approved by counsel. Plaintiff proposes that the conference occur within seven days after the Court rules on this Motion, or within another period set by the Court.

Before the conference, Plaintiff will provide the incident categories and specific records described above. The parties can then determine whether Defendants can disclose the names voluntarily or whether the narrowed discovery must be served.

If the parties cannot resolve the issue, Plaintiff requests permission to submit a short joint status report identifying the remaining disputes. Plaintiff does not request sanctions, fees, contempt, or any finding of bad faith.

VI. REQUEST FOR RELIEF

Plaintiff respectfully requests that the Court:

- a. clarify that Plaintiff may serve replacement Doe-identification discovery limited

to the conditions-of-confinement claims and the June 9–September 9, 2024 period;

- b. authorize the proposed incident-specific interrogatories and document requests, limited to information sufficient to identify persons connected to the specified incidents;
- c. direct the parties to participate in a prompt live meet-and-confer;
- d. extend the September 1, 2026 Doe-identification deadline until thirty days after responses to the narrowed discovery are served, or alternatively until October 2, 2026; and
- e. grant any other relief the Court finds just and appropriate.

Respectfully submitted,
Jason Matthew Lynch, Pro Se
261 Wilson Loop
Ward, Arkansas 72176
Telephone: _____
Email: _____
Date: _____

CERTIFICATE OF SERVICE

I certify that on this ____ day of August 2026, I served a true and correct copy of the foregoing Motion on:

Kaylen Suzanne Lewis

72033-0850 Owens & Parker Law Firm, P.A.
P.O. Box 850
Email: lewis@jowenslawfirm.com
by United States Mail, postage prepaid, and by email.
Conway, Arkansas

Jason Matthew Lynch

DECLARATION UNDER 28 U.S.C. § 1746

I, Jason Matthew Lynch, declare under penalty of perjury that:

- a. I am the Plaintiff in this action.
- b. I served my prior Doe-identification discovery packet on defense counsel on July

20, 2026.

- c. I acknowledge that the ordinary thirty-day response period had not expired when I filed my prior motion to compel.
- d. I have received generalized employee names and job titles, but not information connecting particular persons to the specific incidents described in this Motion.
- e. I am not attempting to identify every employee who worked at WCDC.
- f. I seek only information sufficient to identify persons connected to specific incidents involving the surviving conditions-of-confinement claims.
- g. I am willing to meet and confer promptly with defense counsel.
- h. I am not requesting sanctions and do not allege that defense counsel acted in bad faith.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2026.

Jason Matthew Lynch