

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

JASON MATTHEW LYNCH,
Plaintiff,

v.

DOES 1–3, CLAYTON EDWARDS, HANNAH ROSS, SGT. SWINDLE, SGT. WORKMAN,
SGT. ROGERS, CO. WOOD, SGT. SILER, CO. GOODWIN, ASHLEY WATTS, KAITLYN
SMITH, TURN KEY HEALTH CLINICS, AND JOHN/JANE DOES,
Defendants.

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

PLAINTIFF’S NOTICE OF GOOD-FAITH EFFORTS TO IDENTIFY DOE DEFENDANTS,
MOTION FOR LIMITED EXTENSION OF TIME TO IDENTIFY AND SUBSTITUTE DOE
DEFENDANTS, AND MOTION TO COMPEL TARGETED SUPPLEMENTAL
IDENTIFICATION RESPONSES

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully files this Notice and Motion to advise the Court of his continuing good-faith efforts to identify the remaining Doe Defendants, to identify the specific deficiencies in Defendants’ discovery responses that still prevent substitution and service, and to request a limited extension of time and targeted supplemental identification discovery.

I. INTRODUCTION

This case concerns Plaintiff’s confinement at White County Detention Center and claims arising from medical care, medication handling, legal mail, retaliation, failure to protect, excessive force, and related conduct by jail and medical personnel.

Plaintiff has diligently attempted to identify the remaining Doe Defendants through discovery and informal correspondence. Despite those efforts, Plaintiff still lacks the incident-specific

information needed to amend his complaint, substitute the Doe Defendants, and complete service. The information required to identify those individuals remains within Defendants' possession, custody, and control, including staffing assignments, MAR records, electronic user IDs, medication logs, provider notes, and related records.

Plaintiff does not seek blanket discovery or reconsideration of prior rulings. He seeks only a limited order requiring Defendants and TK Health to provide targeted, verified supplementation sufficient to identify the individuals who participated in the specific events alleged in the pleadings.

II. GOOD-FAITH EFFORTS TO IDENTIFY DOE DEFENDANTS

Plaintiff has not sat on his rights. He has repeatedly attempted to identify the unknown defendants through:

- written discovery requests tailored to Doe identification;
- correspondence and good-faith conferral with defense counsel;
- requests for supplemental staffing and assignment information;
- requests for medication records and MAR information;
- requests for identification of the medical personnel involved in Plaintiff's treatment and medication handling;
- requests for identification of personnel responsible for legal-mail handling and related events.

On July 19, 2026, Plaintiff sent a good-faith conference letter to defense counsel identifying the remaining deficiencies and requesting a sworn supplemental response. That effort was made before renewed court intervention. The letter emphasized that the parties' responses, taken together, still do not answer the central identification questions: who performed each act, on what

date and shift, under whose direction, and through which record, signature, initial, or electronic user account. The letter also requested that counsel identify the proper custodian for each responsive category and provide sworn supplementation rather than a generalized employee list.

III. THE CURRENT RESPONSES REMAIN INCOMPLETE AND DO NOT SUFFICIENTLY IDENTIFY THE DOE DEFENDANTS

The current discovery responses and productions do not provide the information necessary for Plaintiff to identify all proper parties.

A. Staffing lists and broad personnel rosters are not enough

TK Health has produced substantial personnel information, including staffing materials containing numerous names, repeated names, and similarly named employees. But a broad list of employees does not identify who actually performed the relevant acts. Plaintiff needs incident-specific identification tied to the date, shift, assignment, and task at issue.

Likewise, the County production includes broad attendance materials and handwritten job titles, but does not tie persons to the specific housing unit, pill call, medication event, MAR entry, legal-mail incident, transport event, or supervisory directive relevant to Plaintiff's claims.

B. The "Nurse F" issue remains unresolved

The response concerning "Nurse F" remains equivocal. TK Health suggested that "Nurse F" may refer to "Float Nurse" and identified several possible individuals for certain dates. But a list of possibilities is not a definitive identification.

Plaintiff still requires a clear response identifying, for each relevant date and event:

- the person designated or referred to as "Nurse F," if any;
- the specific nurse assigned to Plaintiff's medication care;

- the provider who evaluated Plaintiff near the end of his confinement;
- the physician, pharmacist, or medical authority involved in medication alteration decisions;
- the individuals who made or entered MAR notations such as “absent,” “refused,” “received,” or “not given.”

C. The records do not identify who created or approved disputed medical entries

Plaintiff disputes the accuracy, authenticity, completeness, and reliability of certain records, including the signature appearing on TKH 0045 and other medication and medical records reflecting crushed, floated, dissolved, or otherwise altered medication.

Because of these disputes, Plaintiff needs to know who created, entered, approved, reviewed, or relied upon each challenged record. A record that contains initials, shorthand, or a user ID is not useful unless the corresponding person is identified.

D. The responses do not tie individuals to the specific events alleged

Plaintiff needs identification tied to:

- date;
- shift;
- assignment;
- patient contact;
- specific medical action;
- specific record entry;
- specific directive;
- specific supervisor or prescriber.

Without that information, Plaintiff cannot complete amendment or service as to the Doe Defendants.

IV. DEFENDANTS CONTROL THE INFORMATION NECESSARY FOR IDENTIFICATION

Defendants and TK Health maintain exclusive or superior control over the records needed to identify the Doe Defendants, including:

- staffing assignments and schedules;
- medication administration records;
- audit logs and electronic user records;
- provider notes and medical chart entries;
- pharmacy communications;
- policies and directives regarding medication handling;
- supervision and assignment records;
- legal-mail handling records.

Plaintiff, proceeding pro se and without access to those internal records, cannot independently determine the identities of the persons involved. The requested supplementation is therefore necessary and proportional to the needs of the case.

V. REQUEST FOR LIMITED EXTENSION OF TIME

Plaintiff's motion to identify and substitute Doe Defendants is due August 31, 2026, and the time to serve the Doe Defendants and Haley Workman expires October 13, 2026. Discovery remains open until December 1, 2026. See Dkt. 189, 195, and 201.

Because the information necessary for Doe substitution has not yet been fully produced, Plaintiff

respectfully requests a limited extension of time to identify and substitute the Doe Defendants until thirty (30) days after Defendants and TK Health serve complete supplemental responses sufficient to identify the remaining unknown persons.

Plaintiff has acted diligently and in good faith. Any delay is caused by incomplete responses and the continued need for incident-specific identification information, not by lack of effort on Plaintiff's part.

VI. REQUEST FOR TARGETED SUPPLEMENTAL IDENTIFICATION RESPONSES

Plaintiff respectfully requests that the Court order Defendants and TK Health to serve a verified supplemental response that identifies, to the extent reasonably available after inquiry, the persons whose initials, signatures, user IDs, staffing records, or role descriptions correspond to the events alleged in the pleadings.

For each identified person, the supplemental response should state:

1. full legal name, correct spelling, and any former or alternate name appearing in the records;
2. job title, professional license if any, employer, and dates of employment during the relevant period;
3. shift, housing-unit assignment, pill-call assignment, medication-cart assignment, medical-housing assignment, mail assignment, transport assignment, or supervisory assignment for the relevant event;
4. the specific date, time, incident, request number, grievance number, MAR entry, Bates number, chart note, body-camera file, or directive associated with the person;
5. the specific act performed, decision made, instruction given, record created or modified, or response entered by that person;

6. the identity of any supervisor, prescriber, provider, pharmacist, administrator, or command officer who directed, authorized, approved, or reviewed the act;
7. the initials, abbreviation, signature, shorthand, or electronic user ID used by that person in the produced records;
8. whether counsel represents the person and is authorized to accept or waive service; if not, the last-known service address or a statement of how service may be accomplished.

VII. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter an order:

- A. taking notice of Plaintiff's good-faith efforts to identify the Doe Defendants;
- B. finding that any remaining delay in identification is not attributable to Plaintiff's lack of diligence;
- C. directing Defendants and TK Health to serve verified supplemental responses sufficient to identify the remaining Doe Defendants as set out above;
- D. requiring production of records sufficient to identify the responsible individuals, including staffing assignments, MAR entries, audit logs, provider notes, and related documents to the extent necessary to complete identification;
- E. extending Plaintiff's deadline to identify and substitute the Doe Defendants until thirty (30) days after complete supplemental responses are served;
- F. granting such further relief as the Court deems just and proper.

Respectfully submitted,

[signature block]

Jason Matthew Lynch

Plaintiff, Pro Se

261 Wilson Loop

Ward, Arkansas 72176

Telephone: 501-605-4481

Date: _____

Certificate of Service

I certify that on _____, I served a true and correct copy of the foregoing on all counsel of record via U.S. Mail and/or electronic means consistent with applicable service procedures.

Jason Matthew Lynch