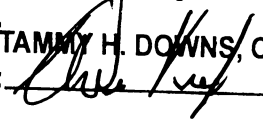


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

JUL 29 2026

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

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

JASON MATTHEW LYNCH,	)	No. 4:24-cv-00740-LPR-BBM
Plaintiff,	)	
	)	
v.	)	
	)	
DOES 1-3, et al.,	)	
Defendants.	)	

PLAINTIFF'S OMNIBUS MOTION TO SUBSTITUTE NEWLY
IDENTIFIED DOE DEFENDANTS, CORRECT PARTY NAMES, COMPEL
IDENTIFYING DISCOVERY, EXTEND THE DOE-IDENTIFICATION
DEADLINE, AND FOR SUCH OTHER RELIEF AS IS JUST

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully moves pursuant to Fed. R. Civ. P. 15(a)(2), Fed. R. Civ. P. 21, Fed. R. Civ. P. 26(b)(1), Fed. R. Civ. P. 26(e), and Fed. R. Civ. P. 37(a) for an order permitting Plaintiff to substitute individuals whose identities have been learned through discovery for previously unidentified Doe defendants, correcting the names of existing parties, compelling targeted discovery necessary to identify the remaining Doe defendants, and extending the deadline for identifying and substituting those defendants.

Plaintiff does not seek to add individuals merely because their names appear on a roster or attendance report. Plaintiff seeks relief only as to individuals for whom the produced records and Plaintiff's personal knowledge provide a good-faith basis connecting them to specific events alleged in this action. Plaintiff also does not seek through this Motion to revive claims previously dismissed by the Court or to assert new official-capacity claims against newly identified individual defendants, unless the Court deems otherwise just and proper.

I. RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. Permit Plaintiff to substitute the newly identified medical defendants identified below for the corresponding Medical Doe or Pill-Nurse Doe defendants;
2. Correct the names of existing defendants in the caption and docket;
3. Permit Plaintiff to continue identifying and, if appropriate, substituting remaining Doe defendants through supplemental discovery;
4. Compel Defendants and Turn Key Health Clinics, LLC to provide targeted identifying information, including names, titles, assignments, shifts, and roles of personnel involved in Plaintiff's medication administration, medical interactions, legal-mail events, housing, transportation, and related conduct;

5. Require Defendants to identify the individual or individuals referred to as "Nurse F" for each relevant medical request or communication;
6. Require Defendants to identify the command or supervisory personnel who directed or authorized the conduct involving Officer Joseph Martin, "Who directed him to pull Lynch from his Pod for court Before everyone else on his court date, legal-mail interference, medical lockdown, or other events alleged in the operative pleading;
7. Extend the deadline for identifying and substituting remaining Doe defendants until Plaintiff receives complete discovery;
8. Permit Plaintiff to supplement this Motion or seek further substitution upon receipt of the compelled discovery;
9. Determine, at the appropriate stage, whether any permitted substitution relates back under Fed. R. Civ. P. 15(c); and
10. Grant such other relief as the Court deems just and proper.

II. FACTUAL AND PROCEDURAL BACKGROUND

This action arises from events occurring during Plaintiff's incarceration at the White County Detention Center between approximately June 9, 2024, and September 9, 2024. Plaintiff originally lacked access to the jail's personnel records, duty rosters, medication-administration records, medical staffing records,

grievance files, and command directives necessary to identify every person involved.

Plaintiff therefore used Doe designations for persons whose identities were unknown to him when the action commenced. Plaintiff has diligently pursued discovery, reviewed medication-administration records, staffing records, attendance reports, medical requests, grievances, correspondence, and other materials produced by Defendants and Turn Key.

The records have now identified several individuals previously designated only as Does. Other records remain incomplete or ambiguous. In particular, Defendants have provided an overinclusive list containing more than two hundred names, including persons who apparently had no interaction with Plaintiff, while failing to identify personnel by specific assignment, shift, act, or date. The production also omits or obscures personnel Plaintiff believes were involved, including command staff and persons identified only by abbreviations or partial names.

A generalized employee list does not answer the narrower question of who administered Plaintiff's medication, entered a particular MAR notation, responded to a particular medical request, participated in pill call, handled Plaintiff's legal mail, transported Plaintiff, or issued instructions concerning Plaintiff's housing or medical care.

Plaintiff seeks targeted information tied to specific events rather than an undifferentiated list of all employees.

III. LEGAL STANDARD

A. Leave to amend or substitute should generally be granted

Under Fed. R. Civ. P. 15(a)(2), the Court should freely give leave to amend when justice so requires. The Supreme Court has identified undue delay, bad faith, repeated failure to cure deficiencies, undue prejudice, and futility as recognized reasons for denying leave. *Foman v. Davis*, 371 U.S. 178, 182 (1962). The Eighth Circuit likewise applies the liberal amendment standard but recognizes that leave may be denied where a motion is untimely, prejudicial, futile, or made in bad faith. *Sherman v. Winco Fireworks, Inc.*, 532 F.3d 709, 715-16 (8th Cir. 2008); *Popoalii v. Corr. Med. Servs.*, 512 F.3d 488, 497-98 (8th Cir. 2008); *United States ex rel. Lee v. Fairview Health Sys.*, 413 F.3d 748, 749 (8th Cir. 2005); *Moses.com Sec., Inc. v. Comprehensive Software Sys., Inc.*, 406 F.3d 1052, 1065 (8th Cir. 2005). Rule 21 likewise permits the Court, on just terms, to add or drop parties at any time. Fed. R. Civ. P. 21; *LeSueur-Richmond Slate Corp. v. Fehrer*, 666 F.3d 261, 265-66 (4th Cir. 2012); *Letherer v. Alger Grp., L.L.C.*, 328 F.3d 262, 266 (6th Cir. 2003), abrogated on other grounds by *Blackburn v. Oaktree Capital Mgmt., LLC*, 511 F.3d 633 (6th Cir. 2008).

Plaintiff has not acted in bad faith or for purposes of delay. He has pursued discovery specifically to identify persons who were unknown when the action began. The proposed substitutions arise from the same medication, medical-care, jail, and related events already placed at issue. Substitution will clarify the case and reduce uncertainty.

B. Discovery must be relevant, proportional, and complete

Discovery may concern any nonprivileged matter relevant to a claim or defense and proportional to the needs of the case. Fed. R. Civ. P. 26(b)(1). The concept of proportionality does not permit a responding party to avoid meaningful identification of witnesses or actors by dumping an undifferentiated employee list. See *Oppenheimer Fund, Inc. v. Sanders*, 437 U.S. 340, 351 (1978); *Trevino v. ACB Am., Inc.*, 232 F.R.D. 612, 614-15 (N.D. Cal. 2006).

A party may move to compel disclosure or discovery when the opposing party fails to answer, provides an incomplete response, or gives an evasive response. Fed. R. Civ. P. 37(a)(3)(B). An evasive or incomplete answer is treated as a failure to answer. Fed. R. Civ. P. 37(a)(4). When a party relies on business records in response to an interrogatory, the records must be identified with sufficient detail to allow the requesting party to locate and identify the information as readily as the responding party. Fed. R. Civ. P. 33(d)(1). A responding party may not use a records production to evade the obligation to provide clear, direct

answers where the identity of actors is what is sought. See Fed. R. Civ. P. 33 advisory committee's note to 1980 amendment; *Mitsui & Co. (USA), Inc. v. Puerto Rico Water Res. Auth.*, 93 F.R.D. 62, 66 (D.P.R. 1981).

Here, Plaintiff does not ask Defendants to identify every employee who worked at the facility. He asks Defendants to identify personnel tied to particular dates, records, medication events, medical requests, pill calls, mail incidents, assignments, and directives. That information is relevant, proportional, and largely within Defendants' possession, custody, or control.

C. Doe defendants may be identified through discovery

The Eighth Circuit has recognized that dismissal of claims against an unnamed defendant may be premature where discovery or court intervention could identify the person. *Munz v. Parr*, 758 F.2d 1254, 1259 (8th Cir. 1985). Numerous courts have held that pro se litigants should be afforded a fair opportunity to identify unknown officers through discovery before dismissal. See *Gillespie v. Civiletti*, 629 F.2d 637, 642-43 (9th Cir. 1980); *Chavis v. Rowe*, 643 F.2d 1281, 1290 n.9 (7th Cir. 1981); *Duncan v. Duckworth*, 644 F.2d 653, 655-56 (7th Cir. 1981); *Gordon v. Leeke*, 574 F.2d 1147, 1152-53 (4th Cir. 1978); *Brandon v. Dist. of Columbia Bd. of Parole*, 734 F.2d 56, 59 (D.C. Cir. 1984).

Plaintiff has proceeded diligently and has identified several individuals through records that Defendants controlled. The remaining identity information should likewise be produced rather than withheld behind a generalized personnel list.

IV. CORRECTION OF EXISTING PARTY NAMES

The produced records and prior docket materials establish that the following individuals are already parties or have already been identified and should not be treated as newly added defendants:

Prior designation	Correct name
Claynton Edwards	Clayton Edwards
Lt. Ross	Hannah Ross
Sgt. Swindle	Josh Swindle
Sgt. Workman	Haley Workman
Sgt. Rogers	Zachary Rodgers
C.O. Wood	Donald Wood
Sgt. Sciler	Cody Siler
C.O. Goodwin	Conner Goodwin
Ashley Watts	Ashley Watt
Katynn Smith or Caitlin Smith	Kaitlyn Smith
Turnkey	Turn Key Health Clinics, LLC

V. NEWLY IDENTIFIED MEDICAL DEFENDANTS

The medication-administration records, medical staffing records, grievances, and related discovery identify medical personnel who may be substituted for previously unknown Medical Doe or Pill-Nurse Doe defendants.

Plaintiff limits the proposed medical claims to individual-capacity claims arising from the alleged crushing, dissolving, altering, withholding, or improper administration or documentation of prescribed medication, including Biktarvy. Plaintiff does not seek new official-capacity claims against the newly identified nurses.

A. Ykebiya Spinks

Position: Float LPN, according to the produced staffing records.

Relevant dates: Approximately August 23, August 24, and August 25, 2024.

Plaintiff alleges that Ykebiya Spinks participated in medication pass and personally provided, handled, or documented Plaintiff's prescribed medication on the identified dates. Plaintiff alleges that his medication was crushed, dissolved, altered, or otherwise presented in a form different from the prescribed form despite his objections.

Plaintiff seeks to substitute Ykebiya Spinks for the corresponding Medical Doe defendant for an individual-capacity deliberate-indifference claim under 42 U.S.C. § 1983, limited to the surviving medication-administration allegations.

B. Savannah Henderson

Position: Associate Regional Float LPN, according to the produced staffing records.

Relevant dates: Approximately August 30, August 31, and September 1, 2024.

Plaintiff alleges that Savannah Henderson participated in medication pass and personally provided or documented Plaintiff's medication on the identified dates. Plaintiff alleges that the medication was crushed, dissolved, altered, or improperly administered despite his objections and the known importance of maintaining his prescribed HIV-treatment regimen.

Plaintiff seeks to substitute Savannah Henderson for the corresponding Medical Doe defendant for an individual-capacity deliberate-indifference claim under 42 U.S.C. § 1983, limited to the surviving medication-administration allegations.

Plaintiff does not presently allege as an established fact that Henderson was "Nurse F." Turn Key's responses have identified Henderson only as a possible

person associated with one communication. Plaintiff requests sworn clarification rather than relying on that possibility as a confirmed identity.

C. Jamie Andersen

Position: LPN, according to the produced staffing records.

Relevant dates: Approximately September 2, September 3, September 6, September 7, and September 8, 2024.

Plaintiff alleges that Jamie Andersen participated in medication pass and personally provided or documented Plaintiff's medication on the identified dates. Plaintiff alleges that medication, including Biktarvy, was crushed, dissolved, altered, or otherwise administered in a form inconsistent with the prescription and over Plaintiff's repeated objections.

Plaintiff also alleges that Andersen's name appears on intake or medical-interview documentation whose accuracy and preparation require further discovery. Plaintiff relies on those documents at this stage for identification and requests production of audit trails and related information concerning their preparation.

Plaintiff seeks to substitute Jamie Andersen for the corresponding Medical Doe defendant for an individual-capacity deliberate-indifference claim under 42 U.S.C. § 1983, limited to the surviving medication-administration allegations.

D. Katlyn Ladd

Position: LPN, according to the produced medical staffing records.

Plaintiff's records identify Katlyn Ladd in connection with intake and medication documentation, including entries concerning June 2024. Plaintiff alleges that medication records attributed to or associated with Ladd contain "absent," "refused," or other entries that do not accurately reflect Plaintiff's circumstances.

Plaintiff was incarcerated and under detention staff's control. He could not voluntarily make himself absent from a medication pass without staff knowledge or action. Plaintiff also disputes entries showing administration at times inconsistent with the ordinary administration schedule for his prescribed medication.

Plaintiff requests either permission to substitute Katlyn Ladd for the appropriate Medical Doe defendant if the Court finds the present records sufficient, or an order requiring Defendants to identify, by sworn supplemental response, whether Ladd administered, withheld, altered, or documented Plaintiff's medication on each disputed date.

E. Heather Jones

The produced records identify Heather Jones as an LPN or medication-pass nurse. Plaintiff alleges that Jones may have participated in medication administration, medication alteration, refusal coding, or inaccurate documentation.

Plaintiff acknowledges that a person identified as "Jones" may have been terminated or otherwise addressed in the Court's prior screening order. Plaintiff does not seek to revive unrelated dismissed claims. Plaintiff seeks to add Heather Jones only to the extent newly produced records establish her personal involvement in the specific surviving medication claim.

Plaintiff requests permission to substitute Heather Jones if the Court finds the relevant MARs and staffing records sufficient, or alternatively requests a sworn supplemental response identifying whether Jones personally administered, altered, withheld, or documented Plaintiff's medication on the disputed dates.

F. Heather Hobbs

The produced records identify Heather Hobbs as an LPN who worked medication pass during the relevant period. Plaintiff alleges that Hobbs may have administered or altered prescribed medication beginning approximately August 21, 2024.

Plaintiff acknowledges that the prior designation "PM Pill Nurse, Heather" may have been addressed in the Court's prior screening order. Plaintiff does not seek to revive unrelated claims. He seeks to name Heather Hobbs only if the newly produced records establish her personal involvement in the surviving medication claim.

Plaintiff requests permission to substitute Heather Hobbs if the Court finds the records sufficient, or alternatively requests sworn supplemental identification of her specific medication-related acts.

VI. MELANIE COMANDINI SHOULD BE TREATED AS A MATERIAL WITNESS AT THIS STAGE

The produced records identify Melanie Comandini as a Float LPN. Plaintiff alleges that, on or about August 10, August 14, August 15, and August 19, 2024, Comandini stated that Biktarvy should not be crushed and declined to crush Plaintiff's medication.

Those facts presently suggest that Comandini may be a material witness concerning whether Biktarvy was routinely crushed, whether medical personnel understood that it should not be crushed, whether staff were instructed to crush medication, and whether supervisors or policymakers directed that practice. Because the presently known facts indicate that Comandini refused to engage in

the allegedly harmful practice, Plaintiff does not presently seek to add her as a defendant. Plaintiff requests that she be identified as a material witness and that Defendants preserve and produce records concerning her involvement.

VII. CORRECTIONAL PERSONNEL IDENTIFIED THROUGH DISCOVERY

The following names have been clarified through discovery:

- Joseph Martin
- Gayelyn Hargrove
- John Long
- Nicole Stipes
- Mason Wilborn
- Dakota Phillips
- Phillip Miller

Plaintiff identifies these individuals for accurate discovery and record purposes. Plaintiff does not ask the Court to revive claims previously dismissed or to add these persons merely because their names appear in a roster.

To the extent the Court determines that any of these individuals remains a proper defendant to a pending claim, Plaintiff requests leave to substitute the person for the corresponding Doe designation after the Court reviews the factual

basis and prior screening orders. Otherwise, Plaintiff requests that Defendants identify them as witnesses, custodians, or discovery subjects and provide assignment, body-camera, mail, transport, and directive records relevant to the claims that remain pending.

VIII. COURTHOUSE TRANSPORT AND VISITATION INCIDENT

Plaintiff alleges that Officer Joseph Martin removed Plaintiff from his housing unit and transported him to the courthouse before inmates from other housing units, resulting in Plaintiff being brought before the Court at the beginning of the docket.

Plaintiff further alleges that, although Plaintiff was called first, Plaintiff's wife was required to remain at the courthouse until the conclusion of the day's docket before being permitted to see him. Plaintiff alleges that she waited approximately eight hours.

Plaintiff contends that this departure from ordinary procedure was intentional or was carried out pursuant to instructions, rather than being random or inadvertent. Plaintiff alleges that the conduct burdened and discouraged his exercise of protected rights, including his right of access to the courts and his right to petition the government for redress of grievances.

The identity of the person or persons who directed or authorized Officer Martin's movement of Plaintiff remains unknown. That information is uniquely within Defendants' possession, custody, or control.

Plaintiff requests targeted discovery identifying:

- the officer who ordered Plaintiff's early transport
- the command staff member responsible for the transport order
- transport and movement logs
- the courthouse transport roster
- written or electronic directives concerning Plaintiff's movement
- records showing why Plaintiff's wife was required to wait until the end of the docket

Plaintiff does not ask the Court at this stage to decide the ultimate merits of this claim. He requests discovery necessary to identify any remaining Doe defendant connected to the incident.

IX. LEGAL-MAIL AND MEDICAL-HOUSING IDENTIFICATION

Plaintiff also requests targeted identification of personnel connected to alleged legal-mail interference and medical housing, including personnel who refused to accept or sign for outgoing legal mail, personnel who received Plaintiff's legal documents, personnel who allegedly acted pursuant to instructions from

supervisory staff, personnel assigned to medical housing, personnel present during conversations concerning Plaintiff's medication, persons responsible for medical lockdown decisions, and persons whose body-worn cameras recorded relevant events.

The requested information is limited to personnel connected to specific incidents and is not a request for an unrestricted list of all jail employees.

X. DEFENDANTS' PRODUCTION REMAINS INCOMPLETE

Defendants have provided Plaintiff with a large list of names, but the list is not organized by date, shift, housing unit, pill-call assignment, medication event, medical request, MAR entry, legal-mail event, transport, body-camera assignment, or supervisory directive.

The production therefore does not allow Plaintiff to determine which person performed which act. It also omits or obscures staff Plaintiff believes were involved, including personnel identified as Ross, Hughes, and others whose names appear inconsistently.

Plaintiff requests that Defendants provide a targeted supplemental response rather than another generalized list. The response should identify each person by full legal name, title, employer, shift, assignment, and specific act or record associated with the person.

XI. CERTIFICATE OF GOOD-FAITH CONFERENCE

Pursuant to Fed. R. Civ. P. 37(a)(1), Plaintiff certifies that he has attempted in good faith to obtain the requested identifying discovery without court action by written communications and requests for narrowed, usable information. Plaintiff has sought targeted information rather than a broad employee list. The dispute remains because the discovery responses have not clearly identified the persons tied to the specific medication, medical-care, legal-mail, transport, housing, and supervisory events described in this Motion.

XII. REQUEST FOR COMPELLED SUPPLEMENTAL DISCOVERY

Plaintiff requests an order requiring Defendants and Turn Key to provide the following:

A. Medical and medication information

11. The full legal name of every person who administered, withheld, altered, crushed, dissolved, floated, contaminated, wasted, or documented Plaintiff's medication.
12. The name of the person corresponding to every signature, initial, abbreviation, electronic user ID, or shorthand designation on Plaintiff's MARs.
13. The identity of "Nurse F" for each medical request or communication in which that designation appears.

14. The full name and assignment of every nurse on pill call during each disputed date.
15. The identity of every person who decided that Plaintiff's medication should be crushed, dissolved, floated, or otherwise altered.
16. The identity of every person who recorded that Plaintiff was absent, refused medication, received medication, or failed to receive medication.
17. Native electronic records, audit trails, metadata, revision histories, and user-access logs for disputed MARs and medical notes.
18. The Dr name that said it was ok to crush Lynch's Meds

B. Jail and correctional information

19. Housing-unit rosters.
20. Duty rosters and shift assignments.
21. Pill-call and medication-escort assignments.
22. Medical-housing assignments.
23. Booking, classification, transport, and courthouse-movement records.
24. Legal-mail logs and mailroom records.
25. Body-camera recordings and corresponding officer assignments.
26. Written or electronic directives concerning Plaintiff's medical housing, transport, visitation, legal mail, or medication.
27. The identity of command staff who issued any such directives.

C. Correction of names

Defendants should provide a sworn response confirming or correcting the following names:

- Katlyn Ladd
- Kaitlyn Smith
- Ashley Watt
- Savannah Henderson
- Jamie Andersen
- Ykebiya Spinks
- Gayelyn Hargrove
- Joseph Martin
- Nicole Stipes
- Mason Wilborn
- Conner Goodwin
- Zachary Rodgers
- Hannah Ross
- Clayton Edwards
- Cody Siler
- Haley Workman

- Donald Wood
- Josh Swindle
- Dakota Phillips
- Phillip Miller

The Court should also direct Defendants to distinguish Richard Ross from Hannah Ross and Jeremy Edwards from Clayton Edwards.

XIII. EXTENSION OF TIME TO IDENTIFY REMAINING DOE DEFENDANTS

Plaintiff requests an extension of the deadline for identifying remaining Doe defendants because the necessary information remains within Defendants' control and because prior production has been incomplete, overinclusive, or insufficiently specific.

The extension should remain in effect until Plaintiff receives complete responses identifying pill-call personnel, medical personnel, shift assignments, housing assignments, duty rosters, escort officers, booking personnel, classification personnel, command staff, Turn Key medical personnel, the persons identified as "Nurse F," persons directing Officer Martin, persons directing legal-mail actions, persons responsible for medical-lockdown decisions, and other Doe defendants identified through continuing discovery.

Plaintiff requests that the Court permit further substitution without prejudice after receipt of the compelled discovery.

XIV. RELATION BACK

Plaintiff requests that the Court preserve his ability to assert relation-back arguments under Fed. R. Civ. P. 15(c) if necessary.

Plaintiff recognizes that relation back is governed by specific requirements and does not ask the Court to determine every relation-back issue prematurely. The proposed substitutions arise from the same medication-administration, medical-care, jail, transport, legal-mail, and related events previously placed at issue.

The Supreme Court has explained that the mistake inquiry under Rule 15(c)(1)(C) focuses on what the prospective defendant knew or should have known, rather than solely on what the plaintiff knew. *Krupski v. Costa Crociere S.p.A.*, 560 U.S. 538, 548-50 (2010). Plaintiff also recognizes that the Eighth Circuit has held that a plaintiff's intentional use of a John Doe designation based solely on lack of knowledge may not itself satisfy the Rule's mistake requirement. *Heglund v. City of Grand Rapids*, 871 F.3d 572, 578-81 (8th Cir. 2017). Other courts have likewise cautioned that John Doe substitutions can present relation-back issues when the plaintiff did not mistakenly name the wrong person but instead did not know the correct one. See *Barrow v. Wethersfield Police Dep't*, 66

F.3d 466, 470 (2d Cir. 1995), as amended, 74 F.3d 1366 (2d Cir. 1996); Wayne v. Jarvis, 197 F.3d 1098, 1102-04 (11th Cir. 1999), overruled on other grounds by Manders v. Lee, 338 F.3d 1304 (11th Cir. 2003).

That authority makes prompt identification and substitution especially important. Plaintiff has acted diligently and has sought the information through discovery authorized or permitted in this case.

XV. DOE DEFENDANT IDENTIFICATION CHART

Former Doe designation	Correct or proposed name	Position	Evidence or basis	Requested treatment
Pill Nurse Doe	Katlyn Ladd	LPN	MARs and staffing records	Addition or sworn confirmation
Pill Nurse Doe	Heather Jones	LPN	MARs and staffing records	Conditional addition; medication claim only
Medical Doe	Kaitlyn Smith	LPN	MARs	Existing defendant; correct spelling
Medical Doe	Heather Hobbs	LPN	MARs and staffing records	Conditional addition; medication claim only
Medical Doe	Ykebiya Spinks	Float LPN	MARs and staffing records	Proposed individual-capacity defendant
Medical Doe	Savannah Henderson	Associate Regional Float LPN	MARs and staffing records	Proposed individual-capacity defendant
Medical Doe	Jamie Andersen	LPN	Intake, MARs, and medical records	Proposed individual-capacity defendant
Medical Doe	Melanie Comandini	Float LPN	Staffing records and Plaintiff's recollection	Material witness at this stage
Correctional Doe	Joseph Martin	Jailer	Discovery and Plaintiff's observations	Identification and targeted discovery
Medical/Correctional Doe	Savannah Chisum	Jailer	Discovery and staffing records	Identification and targeted discovery
Mail Doe	Conner Goodwin	Jailer	Mail records	Existing defendant; correct spelling
Medical/Correctional Doe	Gayelyn Hargrove	Jailer	Witness information and body-camera evidence	Identification and targeted discovery
Correctional Doe	John Long	Correctional officer/jailer	Witness information	Identification and targeted discovery
Mail Doe	Cody Siler	Jailer	Mail records	Existing defendant; correct spelling
Medical/Correctional Doe	Nicole Stipes	Jailer	Witness information and body-camera evidence	Identification and targeted discovery

Former Doe designation	Correct or proposed name	Position	Evidence or basis	Requested treatment
Correctional Doe	Josh Swindle	Jailer	Discovery	Existing defendant; correct name
Mail Doe	Mason Wilborn	Jailer	Legal-mail records	Identification and targeted discovery
Correctional Doe	Dakota Phillips	Jailer	Discovery	Identification and further discovery
Supervisory Doe	Phillip Miller	Sheriff	Grievances and correspondence	Identification and discovery; no new claim requested here

XVI. PRAYER FOR RELIEF

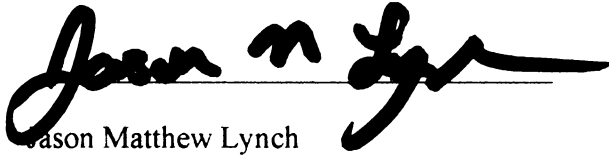
WHEREFORE, Plaintiff Jason Matthew Lynch respectfully requests that the Court:

- a. Permit Plaintiff to substitute Ykebiya Spinks, Savannah Henderson, and Jamie Andersen for the appropriate Medical Doe defendants based on the medication-related allegations and records described above;
- b. Permit Plaintiff to add or substitute Katlyn Ladd, Heather Jones, and Heather Hobbs if the Court determines that the present records establish sufficient personal involvement, or alternatively compel sworn supplemental discovery concerning each person's specific involvement;
- c. Correct the names of existing parties to reflect Clayton Edwards, Hannah Ross, Josh Swindle, Haley Workman, Zachary Rodgers, Donald Wood, Cody Siler, Conner Goodwin, Ashley Watt, Kaitlyn Smith, and Turn Key Health Clinics, LLC;

- d. Recognize Melanie Comandini as a material witness rather than a defendant at this stage;
- e. Order Defendants and Turn Key to identify the full legal names, positions, shifts, assignments, and acts of all personnel involved in Plaintiff's medical care, medication pass, medical housing, legal mail, transport, and related events;
- f. Order Defendants to identify "Nurse F" for every relevant medical request or communication;
- g. Order production of MAR audit trails, staffing records, duty rosters, pill-call assignments, body-camera records, mail logs, transport records, directives, and other information necessary to identify remaining Doe defendants;
- h. Require Defendants to distinguish Richard Ross from Hannah Ross and Jeremy Edwards from Clayton Edwards;
- i. Extend the deadline for identifying and substituting remaining Doe defendants until complete supplemental discovery is provided;
- j. Permit Plaintiff to move to substitute additional Doe defendants after receiving the compelled discovery;
- k. Preserve Plaintiff's ability to seek relation back under Fed. R. Civ. P. 15(c) where legally available;

- l. Deny any request to treat persons as defendants solely because they appear on
an employee roster or attendance report; and
- m. Grant all other relief the Court deems just and proper.

Respectfully submitted,



Jason Matthew Lynch

Plaintiff, Pro Se

261 Wilson Loop

Ward, Arkansas 72176

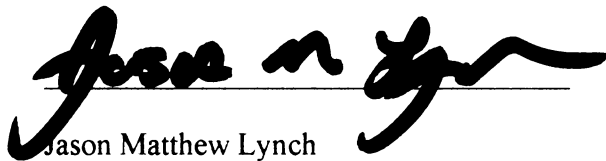
Telephone: 501-605-4481

Email: jlynch@abtechcs.com

Date: 7-15-26

CERTIFICATE OF SERVICE

I certify that on 7-15-26, I served a true and correct copy of the foregoing Motion on all counsel of record by the method authorized for service in this action.

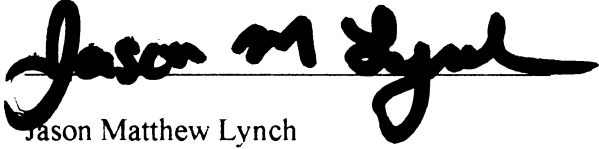


Jason Matthew Lynch

DECLARATION UNDER 28 U.S.C. § 1746

I, Jason Matthew Lynch, declare under penalty of perjury that the factual statements in this Motion are true and correct to the best of my knowledge, information, and belief, based on my personal knowledge, the records produced in discovery, and the information presently available to me.

Executed on 7.15.26.


Jason Matthew Lynch