

TRULINCS 07405510 - LYNCH, JASON M - Unit: ERE-D-A

DATE: 04/12/2026 10:51:02 PM

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

Jason Matthew Lynch
Plaintiff, Pro Se

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

White County, Arkansas, et al.
Defendants

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

APR 17 2026

TAMMY H. DOWNS, CLERK
By:  DEPT. CLERK

***** EMERGENCY MOTION *****

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EMERGENCY MOTION FOR TEMPORARY PROTECTIVE ORDER,
PRELIMINARY INJUNCTION, AND STAY OF STATE COURT WRIT

I. INTRODUCTION AND EMERGENCY NATURE OF RELIEF

Plaintiff, Jason Matthew Lynch, respectfully moves this Court for an immediate Temporary Protective Order (TPO) and Preliminary Injunction to prevent enforcement of a retaliatory civil writ issued by the White County Circuit Court in Case No. 73CV-26-287.

This motion is an emergency because:

Mr. Lynch faces immediate transfer back to White County Jail,
That facility is the subject of ongoing federal civil rights litigation,
The federal court has already found sufficient merit in claims of:
Deliberate indifference to medical needs,
Retaliation,
Unconstitutional conditions of confinement,

The transfer would expose Mr. Lynch to the same actors and conditions that previously endangered his life,

The writ would interrupt his federal sentence, causing:

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Loss of First Step Act credits,

Failure to complete RDAP drug treatment,

Delay or loss of home confinement eligibility,

The state court has scheduled a trial within approximately 30 days while:

Skiping service of process,

Skiping discovery,

Denying due process protections.

This constitutes irreparable harm, retaliation, and trial by surprise, requiring immediate federal intervention.

II. FACTUAL BASIS

A. Prior Harm at White County Jail

Mr. Lynch previously suffered:

Denial of life-saving medication (ART treatment)

Medical neglect lasting approximately 100 days

Retaliatory placement in medical lockdown

Interference with legal rights

These claims are currently pending before this Court and have survived screening.

B. Retaliatory Nature of the Civil Writ

The civil writ:

Arises from a case filed by Mr. Lynch himself,

Seeks to return him to the same facility where violations occurred,

Functions to:

Disrupt his federal sentence,

Undermine his litigation,

Expose him to further harm.

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This constitutes retaliation for protected legal activity, actionable under 42 U.S.C. § 1983 and § 1985.

C. "Trial by Surprise" Denial of Due Process

The state court proceedings:

Set a trial date within ~30 days

Bypass Rule 4 service requirements

Deny discovery under Rules 26 37

Provide no meaningful opportunity to respond

This violates:

Fourteenth Amendment Due Process

Fundamental principles recognized in *Mathews v. Eldridge*, 424 U.S. 319

III. LEGAL STANDARD

A preliminary injunction is warranted where:

1. Likelihood of success on the merits

2. Irreparable harm

3. Balance of equities favors movant

4. Public interest supports relief

Winter v. NRDC, 555 U.S. 7 (2008)

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1. LIKELIHOOD OF SUCCESS ON THE MERITS

Mr. Lynch has already demonstrated a strong likelihood of success:

Federal court allowed claims to proceed under 42 U.S.C. § 1983 and § 1985

Claims include:

Deliberate indifference to serious medical needs (*Estelle v. Gamble*, 429 U.S. 97)

Retaliation for protected conduct

Unconstitutional conditions of confinement

Additionally:

The retaliatory writ implicates access-to-courts violations

The procedural irregularities violate due process (*Mathews v. Eldridge*, 424 U.S. 319)

2. IRREPARABLE HARM

Irreparable harm is overwhelming and immediate:

Risk of death or serious medical deterioration

Loss of federal sentence benefits (First Step Act)

Interruption of RDAP treatment

Exposure to known retaliatory actors

Loss of ability to litigate federal claims

Courts consistently hold:

> "The loss of constitutional freedoms, even for minimal periods of time, unquestionably constitutes irreparable injury."
Elrod v. Burns, 427 U.S. 347 (1976)

3. BALANCE OF EQUITIES

The balance strongly favors Mr. Lynch:

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Defendants suffer no harm from delaying proceedings

Mr. Lynch faces:

Life-threatening consequences

Permanent legal harm

Loss of liberty interests

4. PUBLIC INTEREST

The public interest demands:

Enforcement of constitutional protections

Prevention of retaliation against civil rights litigants

Preservation of federal jurisdiction and authority

Federal courts have a duty to prevent state actions that:

Undermine federal judgments

Chill civil rights enforcement

Create dangerous precedent of retaliatory detention

V. FEDERAL COURT AUTHORITY TO INTERVENE

This Court has authority under:

A. All Writs Act (28 U.S.C. § 1651)

Allows federal courts to:

Protect jurisdiction

Prevent interference with federal proceedings

B. Anti-Injunction Act Exceptions (28 U.S.C. § 2283)

Permits injunctions:

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To protect or effectuate federal judgments

Where necessary in aid of jurisdiction

C. Supremacy Clause (U.S. Const. Art. VI)

Federal constitutional rights override conflicting state actions.

VI. ADDITIONAL FACTORS SUPPORTING RELIEF

A federal judge should consider:

Documented history of:

Medical neglect

Retaliation

Policy failures (Monell liability)

Evidence in Defendants' exclusive control

Ongoing risk of spoliation of evidence

Prior federal court recognition of claim validity

Imminent release timeline (April 2026)

Severe prejudice caused by interruption of federal custody

VII. REQUESTED RELIEF

Mr. Lynch respectfully requests that this Court:

1. Issue an immediate Temporary Protective Order (TPO) prohibiting:

Any transfer to White County custody

Enforcement of the civil writ

2. Grant a Preliminary Injunction:

Staying all state court actions that threaten Plaintiff's safety and rights

Preserving federal jurisdiction

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3. Order Defendants to preserve all evidence

4. Grant any further relief the Court deems just and proper

VIII. CONCLUSION

This case presents a rare and urgent convergence of:

Retaliation

Medical danger

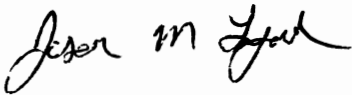
Procedural abuse

Threat to federal jurisdiction

Without immediate intervention, Mr. Lynch faces irreparable harm that cannot be undone.

The Constitution demands more.

This Court has the authority and the obligation to act.

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Respectfully submitted,
Jason Matthew Lynch
Plaintiff, Pro Se