

**IN THE 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 NOTICE TO THE COURT REGARDING GOOD-FAITH EFFORTS TO
OBTAIN DOE-DEFENDANT IDENTIFICATION, COMMUNICATIONS WITH
DEFENSE COUNSEL, AND REQUEST FOR RELIEF**

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully submits this Notice to inform the Court of his repeated, documented, good-faith efforts to obtain the information necessary to identify the remaining Doe Defendants in this action, and to request appropriate relief because that information remains within Defendants’ control.

I. PURPOSE OF THIS NOTICE

This filing is intended to place the Court on notice that Plaintiff has made sustained efforts to identify the unknown correctional and other jail personnel responsible for the conditions alleged in this case, but has been unable to do so without Defendants’ cooperation and responses to targeted discovery.

Plaintiff is not refusing to identify defendants. To the contrary, Plaintiff has repeatedly attempted to do so in good faith. The problem is that the relevant identifying information is uniquely within Defendants’ possession, including employment records, staffing records, shift assignments, supervisory chains, log books, and related jail records.

II. SUMMARY OF PLAINTIFF’S DOE-IDENTIFICATION EFFORTS

Plaintiff has undertaken multiple steps to obtain Doe-identification information before seeking Court intervention, including the following:

- a. preparation and service of a First Doe-Identification Discovery Packet;
- b. follow-up communications to defense counsel explaining that the information provided was incomplete;
- c. additional correspondence seeking clarification of the identities of certain jail personnel;
- d. emails to defense counsel;
- e. USPS mailings to defense counsel;
- f. a FOIA request to White County; and
- g. additional efforts to obtain cooperation and voluntary disclosure.

These efforts were directed at identifying the individuals actually responsible for the conditions claims in this case, not at serving as a substitute for meaningful discovery.

III. FIRST DOE-IDENTIFICATION DISCOVERY PACKET

Plaintiff prepared and served a document specifically labeled the First Doe-Identification Discovery Packet. Its purpose was limited and targeted: to identify unknown correctional staff and other responsible individuals whose names are presently unknown to Plaintiff.

The packet was sent to defense counsel for White County Defendants, including counsel identified in the pleadings and correspondence, and requested information necessary to identify the Doe Defendants, including:

- * housing-unit staff rosters;
- * supervisory chain of command information;
- * maintenance personnel information;
- * recreation responsibility information;
- * food and water responsibility information;
- * grievance-routing personnel;

- * cell-entry and rounds logs; and
- * lock-maintenance records.

The packet was intentionally limited to Doe identification and was not a broad merits-discovery request.

IV. FOLLOW-UP COMMUNICATIONS REGARDING INCOMPLETE IDENTIFICATION

After serving the first discovery packet, Plaintiff sent follow-up communications explaining that any information previously provided was insufficient to identify the actual individuals responsible for the alleged conditions.

Plaintiff specifically sought clarification concerning:

- * the identity of Lt. Ross;
- * the identity of Lt. Hughes;
- * missing or unidentified jail staff;
- * missing or unidentified supervisors; and
- * the individuals responsible for the conditions claims at issue.

Plaintiff's purpose was to narrow the dispute and obtain enough information to name the proper parties, but the responses received did not resolve the identification problem.

V. JOINT LETTER REGARDING TK HEALTH AND MEDICAL IDENTIFICATION ISSUES

Plaintiff also addressed the separate issue of medical-related identification in the companion medical case. That production did not resolve the Doe-identification issues in this case.

The medical discovery produced a large amount of information concerning medical personnel. However, that production did not identify the correctional staff, supervisors, or other jail personnel responsible for the conditions-of-confinement claims asserted here.

Accordingly, Plaintiff informed Defendants that a bulk production of names is not the same as identifying the responsible individuals for the claims in this case. Plaintiff sought only the information relevant to this action and only to the extent necessary to identify the proper parties.

VI. NOTICE AND MOTION SEEKING EXTENSION AND COMPELLED DISCOVERY

Plaintiff also prepared and submitted a Notice and Motion seeking an extension of time and an order compelling discovery responses. The basis for that request was straightforward: Plaintiff cannot identify the Doe Defendants without Defendants' cooperation.

Plaintiff advised the Court that:

- * he has made repeated good-faith efforts;
- * he is not attempting to delay the case;
- * the relevant information is controlled by Defendants;
- * the delay results from Defendants' failure to respond; and
- * targeted discovery is necessary to identify the responsible individuals.

Plaintiff therefore requested:

- * judicial notice of his efforts;
- * an extension of the Doe-identification deadline;
- * an order compelling responses; and
- * any additional relief the Court deems appropriate.

VII. COMMUNICATIONS AND MAILINGS

In addition to the formal discovery packet and follow-up notices, Plaintiff made multiple attempts to obtain cooperation through informal means.

Those efforts included:

- * three emails to defense counsel;
- * three USPS mailings to defense counsel;

- * mail or correspondence directed to White County Detention Center; and
- * a FOIA request to White County.

Despite these efforts, Plaintiff has not received substantive responses sufficient to identify the Doe Defendants or to permit amendment of the complaint with confidence that the correct parties are named.

VIII. WHY RELIEF IS WARRANTED

The identifying information Plaintiff seeks is controlled by Defendants. Specifically, Defendants possess or control:

- * employment records;
- * shift assignments;
- * post assignments;
- * staffing rosters;
- * chain-of-command information;
- * maintenance records;
- * rounds logs;
- * grievance-routing records;
- * sanitation records; and
- * other jail records necessary to match names to responsibilities.

Plaintiff is incarcerated and proceeding without counsel. He cannot independently identify unknown jail employees or reconstruct staffing and supervisory assignments from records that are exclusively in Defendants' possession.

Without court intervention, Plaintiff risks losing claims against responsible individuals simply because Defendants have not provided the information needed to identify them.

IX. REQUEST FOR RELIEF

For the reasons above, Plaintiff respectfully requests that the Court:

- a. take notice of Plaintiff's documented, good-faith efforts to identify the Doe Defendants;
- b. find that any delay in identification is not attributable to Plaintiff;
- c. compel Defendants to provide complete responses to Plaintiff's targeted Doe-identification discovery;
- d. require Defendants to identify the individuals responsible for the conditions alleged in this case to the extent such information is within their possession, custody, or control;
- e. extend the deadline for Doe identification and substitution until at least thirty days after full responses are received; and
- f. grant such other and further relief as the Court deems just and proper.

Respectfully submitted,
/s/ Jason Matthew Lynch
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CERTIFICATE OF SERVICE

I certify that on this ____ day of _____, 2026, I caused a true and correct copy of the foregoing to be served on all counsel of record and any unrepresented parties by U.S. Mail and/or the Court's CM/ECF system, as applicable.

Jason Matthew Lynch, Pro Se