
Lynch v. White County Jail et al., Case No. 4:26-cv-00118-JM-JJV - Plaintiff's First Doe-Identification Discovery Packet

From Jason Lynch <jlynch@abtechcs.com>

Date Mon 7/20/2026 7:24 AM

To Kaylen Lewis <lewis@jowenslawfirm.com>

 1 attachment (265 KB)

Lynch_4-26-cv-00118_Doe_Identification_Discovery_Packet.pdf;

This document outlines a legal discovery request aimed at identifying unknown Doe defendants involved in conditions of confinement at White County Detention Center.

Purpose and Scope

- Limited to identifying individuals and entities connected to unsafe housing conditions, including sanitation issues, cell lock malfunction, and inadequate water and nutrition.
- Excludes unrelated medical, religious, or damages discovery.
- Discovery is time-sensitive, with a deadline of September 1, 2026, for identifying Doe defendants.

Definitions and Instructions

- Clarifies terms such as "Plaintiff," "Relevant Period" (June 9 to September 9, 2024), and "Subject Conditions" (e.g., sewage, mold, sanitation, cell lock issues).
- Emphasizes detailed identification of persons and entities, including full names, roles, shifts, and responsibilities.
- Requires comprehensive searches of records, logs, reports, and electronic data, with instructions to produce searchable PDFs and preserve metadata.
- Calls for redaction of sensitive personal information but mandates full disclosure of names, titles, and roles necessary for identification.

Interrogatories

- Focus on staff assigned to Plaintiff's housing unit, supervisory chain, maintenance personnel, sanitation workers, recreation staff, and those responsible for food and water.
- Seek identification of personnel involved in cell entry, welfare checks, and lock repairs.
- Request details on individuals who received or responded to grievances or notices about Subject Conditions.
- Include identification of personnel with knowledge of the Subject Conditions, including those who conducted rounds, inspections, or repairs.
- Require clarification of similar or confusing names, including full legal names, roles, and responsibilities.
- Ask for information about the sheriff and other officials during the Relevant Period.

Requests for Production

- Cover staff rosters, shift logs, maintenance records, sanitation reports, recreation schedules, grievance logs, and cell-entry logs.

- Seek documentation on water and food records, including complaints and inspection reports.
- Request records related to grievances, requests, and audit trails showing who viewed or responded.
- Require production of records confirming identities of personnel with similar names and outside contractors or vendors involved in maintenance or environmental work.
- Include current employment status and service addresses for potential Doe defendants, with instructions for handling confidential addresses.
- Address missing or destroyed records, requiring retention policies and destruction logs.

Procedural and Compliance Notes

- Emphasizes answering under oath, conducting reasonable inquiries, and supplementing responses as needed.
- Calls for production of documents in their native or searchable formats, with metadata preserved.
- Mandates identification of responsible personnel and entities, including contractors and record custodians.
- Requests that responsive documents be produced from all sources under defendants' control, including vendors and contractors.
- Clarifies that if records no longer exist, defendants must produce retention and destruction policies and logs.

Overall Focus

- The discovery requests are narrowly tailored to identify personnel, contractors, and record custodians involved in the conditions of confinement during the specified period.
- The goal is to facilitate the identification of Doe defendants by gathering detailed personnel and record information related to sanitation, cell security, water, food, and housing conditions at the detention center.



Jason Lynch
Operations Mgr & Network Engineer,
AbTechCs.com

501-605-4481

501-920-2107

Jlynch@abtechcs.com

[6834 Cantrell Road Suite #1183](#)
[Little Rock, AR 72207](#)

[5015633500](#)



Add me on Facebook



Let's Connect!

"Better three hours too soon than a minute too late." - William Shakespeare



IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.