



SUBJECT: RE: White County Supporting Brief Pt 15 - Relief
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Below is PART 15 of Jason Matthew Lynch's Supporting Brief, drafted to integrate seamlessly with Parts 1 14 and to set up Part 16 . This section is written to be forceful, remedial, and equity-focused, emphasizing why declaratory and injunctive relief is not only proper, but necessary and overdue in this case.

****PART 15**

DECLARATORY AND INJUNCTIVE RELIEF
(State Law and Supplemental Federal Authority)**

I. Introduction

Plaintiff Jason Matthew Lynch (Reg. No. 07405-510) seeks declaratory and injunctive relief against White County, Arkansas; the White County Sheriff; White County Jail administration; policymakers; medical contractors; supervisory officials; and John and Jane Does, arising from systemic, ongoing, and deeply entrenched unlawful practices that violated and continue to threaten the life, liberty, bodily integrity, and constitutional rights of detainees housed at the White County Jail.

This request for equitable relief is not incidental. It is central to the administration of justice in this case. Monetary damages alone cannot remedy or prevent the continuing and recurring violations demonstrated by Defendants' conduct. Declaratory and injunctive relief is therefore owed, justified, and required under Arkansas law and supplemental federal principles.

II. Legal Basis for Declaratory Relief

A. Arkansas Declaratory Judgment Act

Arkansas law expressly authorizes declaratory relief under the Arkansas Declaratory Judgment Act, Ark. Code Ann. § 16-111-101 et seq., which empowers courts to:

> "Declare rights, status, and other legal relations whether or not further relief is or could be claimed."
Ark. Code Ann. § 16-111-102

Declaratory relief is appropriate where:

1. A justiciable controversy exists;
2. The parties have adverse legal interests;
3. The controversy is ripe for determination.
Jegley v. Picado, 349 Ark. 600, 80 S.W.3d 332 (2002)

All three elements are met here.

B. Application to Lynch's Case

Mr. Lynch seeks declarations that Defendants:

Violated the Arkansas Constitution, including Article 2, §§ 2, 8, 9, 13, and 24;

Violated the Arkansas Civil Rights Act, Ark. Code Ann. § 16-123-101 et seq.;

Maintained unlawful policies, customs, and practices regarding:

Medical care and continuity of care;

Medication administration;

Grievance handling;

Religious accommodations;

Retaliation against detainees;

Supervision and training of staff.

A declaratory judgment is necessary to formally adjudicate the illegality of Defendants' conduct, guide future conduct, and serve as a predicate for injunctive relief.

III. Legal Basis for Injunctive Relief

Arkansas courts possess broad equitable authority to issue injunctions to prevent ongoing or future harm. See *Three Sisters Petroleum, Inc. v. Langley*, 348 Ark. 167, 72 S.W.3d 95 (2002).

To obtain injunctive relief, a plaintiff must show:

1. Irreparable harm;
2. Inadequacy of legal remedies;
3. Likelihood of future injury or ongoing violation;
4. That the balance of equities favors relief.

Each element is overwhelmingly satisfied.

IV. Irreparable Harm and Ongoing Risk

Mr. Lynch suffered irreparable harm through:

Prolonged denial of life-sustaining HIV antiretroviral medication;

Exposure to serious medical risk and permanent injury;

Loss of religious freedom;

Interference with access to courts;

Retaliation for protected conduct.

These injuries are not speculative. They are real, documented, and stem from institutional failures that remain uncorrected. Arkansas courts recognize that constitutional deprivations and threats to bodily integrity constitute irreparable harm as a matter of law.

See Ark. Dep't of Human Servs. v. Ledgerwood, 2017 Ark. 308, 530 S.W.3d 336.

V. Inadequacy of Monetary Damages Alone

While Mr. Lynch seeks compensatory and punitive damages, damages alone cannot:

Reform unconstitutional policies;

Ensure continuity of medical care;

Prevent retaliation against future detainees;

Protect religious exercise;

Correct systemic supervisory failures.

Arkansas equity jurisprudence recognizes that where harm is systemic and recurring, injunctive relief is indispensable. See Custom Microsystems, Inc. v. Blake, 344 Ark. 536, 42 S.W.3d 453 (2001).

VI. Scope of Injunctive Relief Owed to Lynch

Mr. Lynch seeks narrowly tailored but meaningful injunctive relief, including but not limited to:

1. An injunction requiring timely and uninterrupted access to prescribed medications, including ART;
2. Mandatory medical continuity-of-care protocols upon intake;
3. Independent medical review procedures;
4. Training requirements for custody and medical staff;
5. Prohibition against retaliation for grievances or legal actions;

6. Policies ensuring religious accommodations;

7. Auditing and compliance monitoring;

8. Recordkeeping and transparency reforms.

Such relief is well within the authority of Arkansas courts and is routinely ordered where constitutional violations are shown. See *Shepherd v. Washington County*, 331 Ark. 480, 962 S.W.2d 779 (1998).

VII. Supplemental Federal Authority Supporting Equitable Relief

Although this is a state-law claim, federal precedent strongly supports equitable relief where jail practices endanger life and liberty:

Hutto v. Finney, 437 U.S. 678 (1978);

Brown v. Plata, 563 U.S. 493 (2011);

Ex parte Young, 209 U.S. 123 (1908).

These cases confirm that structural injunctive relief is appropriate where officials persist in unconstitutional conduct.

VIII. Pattern and Practice Prelude to Part 16

Part 16 of this Brief will document the longstanding and well-known history of misconduct involving White County, Sheriff Edwards, Turn Key Health Clinics, and related actors, demonstrating that:

These violations are not isolated;

Similar harms have occurred for years;

Defendants have been repeatedly placed on notice;

Corrective action has been ignored or resisted.

This history will establish a pattern and practice of unlawful conduct, reinforcing the necessity of declaratory and injunctive relief to protect future detainees and the public interest.

IX. Justice, Equity, and the Public Interest

Arkansas courts have consistently held that equity will not suffer a wrong without a remedy. See *City of Dover v. Barton*, 337 Ark. 186, 987 S.W.2d 705 (1999).

Here, justice requires more than compensation it requires reform, accountability, and prevention. The relief sought by Mr. Lynch serves not only his interests, but the public's interest in lawful, humane jail administration.

X. Conclusion

Declaratory and injunctive relief is lawful, necessary, and just in this case. Defendants' conduct reflects a systemic disregard for life, liberty, and the rule of law, and absent court intervention, similar harm will recur.

Accordingly, Mr. Lynch respectfully requests that this Court:

Declare Defendants' actions unlawful;

Enjoin ongoing unconstitutional practices;

Order affirmative reforms sufficient to prevent future harm.

This Court has both the authority and the obligation to act.
