

**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 THIRD NARROWED DISCOVERY REQUESTS FOR DOE
IDENTIFICATION

Conditions-of-Confinement Claims Only

Plaintiff Jason Matthew Lynch, proceeding pro se, serves these narrowly tailored discovery requests solely to identify unidentified defendants involved in the surviving conditions-of-confinement claims. These requests are served pursuant to Fed. R. Civ. P. 33, Fed. R. Civ. P. 34, and Fed. R. Civ. P. 37, and are intended to comply with the Court’s July 31, 2026 Order.

I. Scope and Limitations

1. These requests concern only alleged conditions of confinement at the White County Detention Center (“WCDC”) between **June 9, 2024, and September 9, 2024**.
2. The conditions at issue are limited to:
 - a. exposure to human waste, blood, raw sewage, and black mold;
 - b. sleeping on a concrete floor or lack of an available bed;
 - c. unsafe drinking water;
 - d. inadequate, rotten, or missing food;
 - e. denial of meaningful exercise or yard call;
 - f. denial of soap or basic hygiene supplies;

- g. an unsecured or malfunctioning cell door creating a safety risk; and
 - h. overcrowding, but only insofar as specific records identify personnel responsible for housing assignments, bed assignments, or responses to the conditions listed above.
- 3. These requests seek only information sufficient to identify persons who personally participated in, observed, received notice of, documented, investigated, supervised, or were assigned responsibility for a specified condition.
- 4. These requests do **not** seek medical-treatment information, medical records, claims concerning an ingrown toenail, access-to-courts claims, legal-mail claims, retaliation claims, strip-search claims, religious claims, transportation claims, or unrelated incidents.
- 5. “Identify” means to provide the person’s full name, job title, employer, and, if known, current business address or other address at which service may be accepted. If a record identifies a person only by initials, abbreviation, badge number, or electronic user identification, identify the information necessary to associate that identifier with the person’s full name.
- 6. “Specific record” means the incident report, grievance-routing record, housing or shift roster, maintenance request, work order, sanitation log, food or water log, recreation log, surveillance index, or comparable record that connects the identified person to the specified incident.

INTERROGATORIES

Interrogatory No. 1 — Human Waste, Blood, Sewage, or Mold

Identify each person who, during the period **June 9, 2024, through September 9, 2024**, personally observed, received notice of, documented, investigated, corrected, supervised, or was assigned responsibility for a specific incident involving human feces, blood, raw sewage, or black mold in Plaintiff’s housing area, cell, pod, or shower.

For each person, state:

- a. the person's full name, title, and employer;
- b. the approximate date, time, and location of the incident;
- c. the specific condition involved;
- d. how the person became involved;
- e. the specific record identifying or connecting that person to the incident; and
- f. whether the person is still employed by WCDC or White County.

Interrogatory No. 2 — Concrete Sleeping Surface or Bed Assignment

Identify each person who, on any specific date between **June 9, 2024, and September 9, 2024**, assigned Plaintiff to sleep on a concrete floor, denied or failed to provide an available bed after receiving notice that Plaintiff lacked a bed, supervised the relevant housing unit, or documented the bed or housing assignment.

For each person, identify:

- a. the date and housing location;
- b. the person's assignment or role;
- c. the person's specific act or notice; and
- d. the housing roster, bed-assignment record, classification record, grievance, or other specific record connecting the person to the incident.

Interrogatory No. 3 — Unsafe Drinking Water

Identify each person who, on or about any specific date or short date range between **June 9, 2024, and September 9, 2024**, distributed, inspected, tested, maintained, supervised, received notice of, investigated, or documented the unsafe or excessively hot drinking water alleged by Plaintiff.

For each person, state:

- a. the date and location;
- b. the person's job title and assignment;
- c. the specific act, notice, or responsibility;
- d. the source of the person's identification; and
- e. the specific water, maintenance, grievance, incident, or inspection record identifying that person.

Interrogatory No. 4 — Food-Service Incident

Identify each person who, on or about a specific meal or date between **June 9, 2024, and September 9, 2024**, prepared, distributed, inspected, supervised, received notice of, investigated, or documented the allegedly rotten, inadequate, or missing food provided to Plaintiff.

For each person, state:

- a. the date, meal, and location;
- b. the person's employer, title, and assignment;
- c. the person's specific involvement; and
- d. the specific meal log, food-service roster, grievance, incident report, or other record identifying that person.

Interrogatory No. 5 — Exercise or Yard-Call Incident

Identify each person assigned to supervise, authorize, cancel, deny, document, or respond to Plaintiff's exercise or yard call on each specific date or short date range between **June 9, 2024, and September 9, 2024**, when Plaintiff was allegedly denied meaningful exercise or outdoor access.

For each person, state:

- a. the date and housing unit;
- b. the assigned post or shift;

- c. the specific decision, cancellation, denial, or notice; and
- d. the recreation log, post roster, lockdown log, grievance, or incident record identifying that person.

Interrogatory No. 6 — Hygiene Supplies

Identify each person who, on a specific date between **June 9, 2024, and September 9, 2024**, received Plaintiff's request for soap or basic hygiene supplies, denied or failed to provide the requested item, supervised the responsible housing area, or documented the request or response. For each person, identify the date, location, request, response, and specific grievance, request log, supply log, roster, or other record connecting the person to the incident.

Interrogatory No. 7 — Cell-Door or Lock Incident

Identify each person who, on or about the specific date or short date range when Plaintiff's cell door was allegedly unsecured or malfunctioning, received notice of the condition, inspected or repaired the lock, supervised the housing unit, documented the condition, or was responsible for responding to the resulting safety risk.

For each person, state:

- a. the cell or housing location;
- b. the approximate date and time;
- c. the person's title, assignment, and specific involvement; and
- d. the specific maintenance request, lock log, incident report, grievance, roster, or other record identifying that person.

Interrogatory No. 8 — Incident-Specific Supervisory or Notice Identification

For each incident identified in response to Interrogatories Nos. 1 through 7, identify the first-line supervisor and the command or administrative employee who received a written or electronic report, grievance, incident report, work order, or other notice concerning that specific incident.

For each person, identify the specific incident, date, location, form of notice, and record connecting the person to that notice.

Interrogatory No. 9 — Unidentified Names or Identifiers

For every responsive record concerning the incidents above that identifies a person only by initials, badge number, post number, signature, abbreviation, or electronic user ID, identify the corresponding full name, job title, employer, and assignment during the relevant date.

Interrogatory No. 10 — Records Searched

If Defendants cannot identify a person requested above, state:

- a. the specific records and systems searched;
- b. the custodians or departments consulted;
- c. the date range searched;
- d. whether the responsive record was unavailable, destroyed, overwritten, or never created; and
- e. if unavailable, the record-retention period and last known custodian.

REQUESTS FOR PRODUCTION

Request for Production No. 1 — Relevant Staff and Post Rosters

Produce the staff, post, shift, and housing-unit assignment records sufficient to identify correctional officers, supervisors, detention administrators, maintenance personnel, food-service personnel, and recreation personnel assigned to the locations and dates specifically identified in responses to Interrogatories Nos. 1 through 8.

Request for Production No. 2 — Sanitation, Sewage, Waste, Blood, and Mold Records

Produce the incident reports, sanitation logs, maintenance requests, work orders, inspection

records, grievances, and other records sufficient to identify the persons who observed, received notice of, documented, investigated, or responded to the specific human-waste, blood, raw-sewage, or black-mold incidents identified in response to Interrogatory No. 1.

Request for Production No. 3 — Bed and Housing Assignments

Produce the housing rosters, bed-assignment records, classification records, and housing-unit logs sufficient to identify the persons responsible for Plaintiff's bed or housing assignment on the specific dates and locations identified in response to Interrogatory No. 2.

Request for Production No. 4 — Water Records

Produce the water-related maintenance requests, inspection or testing records, incident reports, grievances, and work orders sufficient to identify the persons responsible for, or notified about, the specific unsafe-water incidents identified in response to Interrogatory No. 3.

Request for Production No. 5 — Food-Service Records

Produce the food-service rosters, meal logs, inspection records, incident reports, grievances, and other records sufficient to identify the persons responsible for preparing, distributing, inspecting, supervising, or responding to the specific food incidents identified in response to Interrogatory No. 4.

Request for Production No. 6 — Exercise and Yard Records

Produce the recreation schedules, yard-call logs, lockdown logs, post assignments, cancellation records, grievances, and incident reports sufficient to identify the persons responsible for, or notified about, the specific exercise or yard-call incidents identified in response to Interrogatory No. 5.

Request for Production No. 7 — Hygiene-Supply Records

Produce the supply logs, request logs, grievances, incident reports, and housing-unit records

sufficient to identify the persons who received or responded to Plaintiff's specific requests for soap or basic hygiene supplies identified in response to Interrogatory No. 6.

Request for Production No. 8 — Cell-Door and Lock Records

Produce the maintenance requests, work orders, lock-inspection records, incident reports, housing logs, grievances, and post assignments sufficient to identify the persons who received notice of, inspected, repaired, documented, supervised, or responded to the specific cell-door or lock incident identified in response to Interrogatory No. 7.

Request for Production No. 9 — Grievance-Routing Records

For each specific grievance or request identified in response to Interrogatory No. 8, produce the grievance, routing history, response history, audit trail, and identifying information sufficient to determine each person who received, routed, reviewed, investigated, approved, or closed that grievance or request.

Request for Production No. 10 — Identifier Cross-References

Produce records sufficient to translate any initials, signatures, badge numbers, post numbers, abbreviations, or electronic user IDs appearing in responsive records into the corresponding person's full name, title, employer, and assignment during the relevant date.

Request for Production No. 11 — Incident-Specific Surveillance Index

For each specific incident identified in response to Interrogatories Nos. 1 through 8, produce any existing surveillance index, camera-assignment log, preservation record, or other record sufficient to identify the camera location, date, time range, and personnel assigned to or appearing at the relevant location.

This request does not seek production of all WCDC surveillance footage. It is limited to records sufficient to identify potential Doe defendants for the specific incidents described above.

Request for Production No. 12 — Nonexistence or Unavailability

If Defendants contend that any responsive record does not exist or is unavailable, produce the written retention, destruction, overwrite, or loss record, if any, and identify the record custodian, retention period, and date and manner in which the record became unavailable.

DEFINITIONS

1. “Plaintiff” means Jason Matthew Lynch.
2. “Defendants” means White County, Arkansas, and the named defendants in their official capacities, together with persons responsible for maintaining or searching WCDC records.
3. “WCDC” means White County Detention Center, including the White County Jail.
4. “Specific date or short date range” means the date alleged in the operative complaint or, if the exact date is unknown, a period no longer than fourteen consecutive days.
5. “Record” includes paper and electronically stored information, including logs, rosters, reports, work orders, grievances, routing histories, audit trails, and records containing initials, signatures, badge numbers, or electronic user IDs.
6. “Sufficient to identify” does not require production of unrelated documents or the complete personnel file of any person.

CERTIFICATE OF SERVICE

I certify that on _____, 2026, I served the foregoing **Plaintiff’s Third Narrowed Discovery Requests for Doe Identification—Conditions-of-Confinement Claims Only** by depositing a true and correct copy in the United States Mail, postage prepaid, addressed to:

Kaylen Suzanne Lewis

Owens & Parker Law Firm, P.A.

Post Office Box 850

Conway, Arkansas 72033

I understand that these discovery requests are served directly on opposing counsel and are not filed with the Court unless required by Fed. R. Civ. P. 5(d)(1) or ordered by the Court.

Jason Matthew Lynch

Plaintiff, Pro Se

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Ward, Arkansas 72176