

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

JASON LYNCH

PLAINTIFF

v.

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

DOES 2-3, CAPT. CLAYNTON EDWARDS, LT. ROSS
SGT. SWINDLE, SGT. WORKMAN, SGT. ROGERS,
CO WOOD, SGT. SCILER, CO GOODWIN, ASHLEY WATTS
KATYNN SMITH, TURNKEY, DOE 1

DEFENDANTS.

**DEFENDANT TK HEALTH'S RESPONSES TO PLAINTIFF'S FIRST AND SECOND
LIMITED SETS OF DISCOVERY REQUESTS REGARDING EXHAUSTION AND
IDENTIFICATION OF DOE DEFENDANTS**

Defendant Turn Key Health Clinics, LLC, d/b/a TK Health, submits the following response to Plaintiff's First (served May 15, 2026) and Second (served June 8, 2026) Sets of Discovery Requests Regarding Exhaustion and Identification of Doe Defendants, as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify every correctional officer, sergeant, lieutenant, captain, booking officer, transport officer, control-room officer, segregation officer, and shift supervisor who had any interaction, contact, supervision, or involvement with Plaintiff during the Relevant Time Period. For each individual identified, provide:

- (i) Full legal name;
- (ii) Badge number or employee identification numbers;
- (iii) Rank/title;
- (iv) Employer;
- (v) Last known business address;

- (vi) Dates of employment;
- (vii) Shift assignments;
- (viii) Assigned housing units; and
- (ix) Specific involvement with Plaintiff.

RESPONSE: Defendant is not the custodian of the requested county records.

INTERROGATORY NO. 2: Identify every nurse, physician, nurse practitioner, medical assistant, pill-call officer, medical supervisor, and medical contractor who:

- (i) Dispensed medication to plaintiff;
- (ii) Withheld medication from Plaintiff;
- (iii) Altered Plaintiff's medication schedule;
- (iv) Responded to Plaintiff's medical complaints;
- (v) Reviewed Plaintiff's medical grievances; or
- (vi) Participated in decisions concerning Plaintiff's medical care.

For each person identified, provide: (a) full legal name; (b) professional title; (c) employer; (d) dates worked at White County Detention Center; (e) shift assignments; and (f) nature of involvement with Plaintiff.

RESPONSE: Defendant objects to this request as being overly broad in that it is not reasonably limited in time or scope. For example, the identity of every potential medical personnel and their supervisors is not reasonably calculated to identify the Doe Defendants based on the allegations within Plaintiff's complaints. Nor are the dates of their employment, their employer, or their shift assignments relevant or probative to the limited discovery permitted at this point, which is narrowly tailored to the issues of exhaustion and identification of Doe Defendants. Defendant further objects to this request as being unduly burdensome, as it would require Defendant to expend

considerable time and resources to identify information that is available to Plaintiff.

To that end, and subject to these objections, please see the medical records produced as Bates Nos.¹ TKH 0001-0074, which contain all of Plaintiff's medical records from TK Health at White County Detention Center during the care at issue.

More specifically, Defendant further responds as follows: personnel who "dispensed medication to plaintiff" can be identified on Bates Nos. TKH 0012-0015 and 0038-0041. Defendant is not aware of any medical personnel who "withheld medication from Plaintiff," but any such information would be contained within the medical records produced. Any changes to Plaintiff's medications would be reflected in the medical records, likely at TKH 0010-0012, 0033, 0038-0041, 0043, 0048, and 0073-0074. Medical personnel who "responded to Plaintiff's medical complaints" are identified within the complete medical records, including at Bates Nos. TKH 0004-0010, 0033, 0042, 0044-46, and 0047. Defendant is not the custodian of grievance records and therefore cannot identify who would have "reviewed Plaintiff's medical grievances." That information is within the custody of the County. Individuals who "participated in decisions concerning Plaintiff's medical care" is contained within the medical records produced.

INTERROGATORY NO. 3: Identify all individuals responsible for:

- (i) Reviewing inmate grievances;
- (ii) Reviewing grievance appeals;
- (iii) Operating Smart Communications systems;
- (iv) Maintaining grievance databases;
- (v) Preserving surveillance footage; and

¹ "Bates Nos." are the numbers stamped at the bottom righthand corner of the produced records. Defendant will reference these numbers throughout its responses to assist Plaintiff in identifying the requested information within those records.

- (vi) Supervising Plaintiff's housing assignments.

RESPONSE: Defendant is not the custodian of the County grievance system or grievance records. Such information is within the custody of the County.

INTERROGATORY NO. 4: Identify every individual present during any incident involving:

- (i) Plaintiff's requests for medical treatment;
- (ii) Pill call or medication distribution;
- (iii) Denial of medical treatment;
- (iv) Use of segregation or restricted housing;
- (v) Retaliatory actions;
- (vi) Legal mail handling; or
- (vii) Plaintiff's grievances and complaints.

RESPONSE: Defendant objects to this request as being unduly burdensome, as it would require Defendant to expend considerable time and resources to identify information that is available to Plaintiff. To that end, and subject to this objection, please see the medical records produced as Bates Nos. TKH 0001-0074, which contain all of Plaintiff's medical records from TK Health at White County Detention Center during the care at issue. The requested information, to the extent it is within TK Health's custody, is contained within those records. Defendant is not the custodian of the County grievance system or grievance records. Defendant is not involved in legal mail handling or "use of segregation or restricted housing," as those are detention functions. Such information is within the custody of the County. Defendant denies that it ever denied Plaintiff medical treatment or engaged in retaliatory conduct toward Plaintiff.

INTERROGATORY NO. 5 [June 8, 2026 Interrogatory No. 4]: Identify every official

who reviewed, denied, ignored, screened, rejected, or responded to grievances or appeals submitted by Plaintiff. For each official, state: (a) full name; (b) position; (c) employer; (d) dates of involvement; and (e) basis for each denial or rejection.

RESPONSE: Defendant is not the custodian of the County grievance system or grievance records. Such information is within the custody of the County.

REQUESTS FOR PRODUCTION

REQUEST NO. 1: IDENTIFICATION OF ALL DOE DEFENDANTS. Produce all documents sufficient to identify every staff member, officer, nurse, supervisor, contractor, medical provider, grievance officer, and employee who interacted with Plaintiff during the relevant time frame. This includes:

- (i) Full legal name;
- (ii) Rank and title;
- (iii) Employer;
- (iv) Shift assigned;
- (v) Dates worked;
- (vi) Assigned pod or housing unit;
- (vii) Job duties;
- (viii) Supervisory role;
- (ix) Medical role;
- (x) Pill call responsibilities;
- (xi) Grievance responsibilities;
- (xii) Court transport responsibilities.

RESPONSE: Defendant objects to this Request as being overly broad as to time and scope and

unduly burdensome as it seeks to require Defendant to comb through all of Plaintiff's medical records for a four-month period of time to identify individuals who had no involvement in Plaintiff's care or relationship to the medical decision-making involved in Plaintiff's care.

Subject to these objections, Defendant has produced Plaintiff's medical records from the White County Detention Center, which contain all medical staff known to have interacted with Plaintiff during his incarceration at the White County Detention Center. See the documents produced as Bates Nos. TKH 0001-0074.

REQUEST NO. 2: ALL DUTY ROSTERS. Produce all duty rosters, shift schedules, staffing assignments, pod assignments, post assignments, and medical staffing schedules for:

- (i) F Pod;
- (ii) Medical lockdown;
- (iii) PM pill call;
- (iv) Intake;
- (v) Segregation;
- (vi) Court transport;
- (vii) Court security/bailiff assignments.

RESPONSE: Defendant has produced its personnel time records for the White County Detention Center June 1, 2024 to September 30, 2024, as Bates Nos. TKH 0075-0083. Defendant does not maintain records in a manner that would be able to identify who was present on specific pods. The medical records produced herein will reflect who was involved in Plaintiff's medication pass and who conducted Plaintiff's medical intake. Defendant is not involved with court transport, segregation, or court security/bailiff assignments; those records, if they exist, would be within the custody of the County.

REQUEST NO. 3: IDENTIFICATION OF “NURSE F.” Produce all documents sufficient to identify the individual referred to as “Nurse F.”

RESPONSE: Defendant has produced Plaintiff’s medical records from the White County Detention Center, which contain all of the medical staff known to have interacted with Plaintiff during his incarceration at the White County Detention Center. If Plaintiff has difficulty reading any of the names of the personnel identified within his records, Defendant asks that Plaintiff contact counsel with the specific pages he needs assistance with. Defendant has also produced the timesheet records indicating the medical personnel on shift at the White County Detention Center between June 1, 2024 to October 1, 2024. To Defendant’s best information and belief, “F. Nurse” represents the “Float Nurse” on shift at the date and time indicated in the Sick Call responses. Defendant has produced time records (Bates Nos. TKH 0075-0083) which indicate who the float nurses were on staff during Plaintiff’s incarceration at the White County Detention Center. Specific to Plaintiff’s two Medical Requests on June 11, 2024 and on July 6, 2024, Defendant believes the float nurse would have been: Savannah Henderson, LPN for the June 11, 2024 Request; and, for the July 6, 2024 Request, either: Heather Jones, LPN, Katlyn Ladd, LPN, or Ashley Watt, LPN.

REQUEST NO. 4: IDENTIFICATION OF ALL PM PILL NURSES. Produce the identities of all PM pill nurses working during the relevant time frame, including:

- (i) Full names;
- (ii) Dates worked;
- (iii) Shift hours;
- (iv) Medication assignment logs;
- (v) Medication cart assignments.

RESPONSE: Defendant does not maintain records in a manner that would identify

“medication assignment logs” or “medication cart assignments.” The remainder of the requested information is contained within the produced medical records and time records.

REQUEST NO. 5: SHERIFF IDENTIFICATION. Produce documents identifying the Sheriff of White County during 2024, including supervisory authority over detention operations.

RESPONSE: Defendant is not the custodian of County records and defers to the County to provide the appropriate response to this Request.

REQUEST NO. 6: COURT DOCKET CONTROL AND COURTROOM ASSIGNMENTS. Produce documents sufficient to identify:

- (i) Who controlled inmate court-call scheduling;
- (ii) Who determined inmate courtroom order;
- (iii) Who controlled transport scheduling;
- (iv) Who directed Plaintiff to be called first before all pods and inmates;
- (v) Who made the decision to make Plaintiff’s wife wait until the final matter in the courtroom;
- (vi) Any communications or directives regarding such scheduling decisions.

RESPONSE: Defendant has no involvement in court docket control or courtroom assignments. Therefore, Defendant has no information responsive to this request.

REQUEST NO. 7: ALL GRIEVANCES AND REQUESTS. Produce all grievances, inmate requests, medical requests, appeals, responses, denials, routing logs, and related records submitted by Plaintiff during the relevant time frame. This includes all records concerning:

- (i) Medical needs;
- (ii) HIV medication;
- (iii) Pill call;

- (iv) Conditions of confinement;
- (v) Religious issues;
- (vi) Staff misconduct;
- (vii) Retaliation;
- (viii) Legal mail;
- (ix) Medical lockdown;
- (x) Housing;
- (xi) Access to Courts.

Plaintiff specifically requests the records in native format with: tracking numbers; timestamps; response dates; appeal dates; staff identifiers; routing history.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records. Any responsive information, to the extent TK Health is in possession of the same, is contained within the produced medical records.

REQUEST NO. 8: GRIEVANCE POLICIES. Produce all grievance policies, inmate handbook provisions, appeal procedures, timelines, and directives governing inmate grievances during the relevant period.

RESPONSE: Defendant is not the custodian of County grievance policies, procedures, or inmate handbooks. See the produced TK Health policy J-34 Grievance Process for Healthcare Complaints, produced as Bates Nos. TKH 0084-0085.

REQUEST NO. 9: GRIEVANCE LOGS. Produce all grievance tracking logs, kiosk logs, appeal logs, rejection logs, and grievance database entries related to Plaintiff.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records.

REQUEST NO. 10: COMMUNICATION RECORDS. Produce all inmate-to-staff communications submitted by Plaintiff relating to:

- (i) Medication;
- (ii) Medical care;
- (iii) Conditions of confinement;
- (iv) Staff conduct;
- (v) Retaliation;
- (vi) Legal mail;
- (vii) Religious practices.

RESPONSE: Defendant is not the custodian of inmate communications at the White County Detention Center, and the County would be the appropriate custodian of such records. To the extent Defendant is in possession of any such communications, they are contained within the medical records produced.

REQUEST NO. 11 [June 8, 2026 Request No. 1]: Produce all duty rosters, staffing schedules, shift logs, pod assignment sheets, overtime records, housing assignment records, and employee sign-in sheets for the Relevant Time Period.

RESPONSE: See the produced time records.

REQUEST NO. 12 [June 8, 2026 Request No. 5]: Produce all Smart Communications records, kiosk communications, inmate requests, electronic grievances, request-to-staff forms, electronic messages, and associated metadata submitted by Plaintiff.

RESPONSE: Defendant is not the custodian of inmate communications at the White County Detention Center, and the County would be the appropriate custodian of such records. To the extent Defendant is in possession of any such communications, they are contained within the

medical records produced.

REQUEST NO. 13 [June 8, 2026 Request No. 6]: Produce the complete grievance policy, inmate handbook, medical grievance procedures, appeal procedures, and all revisions in effect during the Relevant Time Period.

RESPONSE: Defendant is not the custodian of County grievance policies, procedures, or inmate handbooks. See the produced TK Health policy J-34 Grievance Process for Healthcare Complaints, produced as Bates Nos. TKH 0084-0085.

REQUEST NO. 14 [June 8, 2026 Request No. 7]: Produce all grievances, requests to staff, medical requests, appeals, kiosk submissions, informal complaints, emergency grievances, and related responses submitted by Plaintiff during the Relevant Time Period.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records.

REQUEST NO. 15 [June 8, 2026 Request No. 8]: Produce all grievance tracking logs, grievance indexes, grievance databases, grievance spreadsheets, and grievance audit trails related to Plaintiff.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records.

REQUEST NO. 16 [June 8, 2026 Request No. 9]: Produce all policies, training materials, directives, memoranda, emails, or communications concerning:

- (i) Handling inmate grievances;
- (ii) Preservation of grievances;
- (iii) Deletion of grievances;
- (iv) Exhaustion under the PLRA;

- (v) Litigation holds;
- (vi) Legal mail; or
- (vii) Retaliation against inmates for filing grievances or lawsuits.

RESPONSE: Defendant is not the custodian of County policies or procedures related to grievances, PRLA, legal mail, or retaliation. See the produced TK Health policy J-34 Grievance Process for Healthcare Complaints, produced as Bates Nos. TKH 0084-0085.

REQUEST NO. 16 [June 8, 2026 Request No. 11]: Produce all litigation hold notices, preservation directives, or communications relating to Plaintiff or this litigation.

RESPONSE: Defendant objects to this Request as exceeding the scope of discovery permitted under the current Court orders, which is narrowly tailored to the issues of exhaustion and identification of Doe Defendants.


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CERTIFICATE OF SERVICE

This is to certify that on the 9th day of July, 2026, I electronically transmitted the above document via e-mail to the following:

Kaylen S. Lewis

lewis@joneslawfirm.com

I also certify that I served the following, who is not a registered participant of the ECF System for filing, via first class mail postage prepaid:

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Ward, AR 72176
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Plaintiff, Pro Se

A handwritten signature in black ink, appearing to read "Alexander C. DeLoe", written over a horizontal line.