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

Dear Ms. Lewis:

Enclosed for service on Defendants White County, Arkansas, Clayton Edwards, Lieutenant Hannah Ross, and Sergeant Swindle are Plaintiff's First Set of Interrogatories and First Requests for Production, expressly limited to identifying the presently unknown Doe Defendants in this action.

The Court has authorized discovery for the purpose of identifying the Doe Defendants and has directed that discovery requests be served directly on opposing counsel rather than filed with the Court. The Court has also set September 1, 2026 as the final deadline for Plaintiff to identify and serve the Doe Defendants, with no further extensions. These requests are therefore narrow, time-sensitive, and directed to information uniquely within Defendants' possession, custody, or control.

The requests seek assignment-specific information. A generalized employee list, attendance report, or roster that does not identify the person's unit, post, date, shift, and role will not answer the requests. Where more than one person has a similar name, or a record uses initials or an abbreviated title, please provide the full legal name and distinguish the individuals. This includes clarification of Hannah Ross versus Richard Ross, Clayton Edwards versus Jeremy Edwards, Lt. S. Hughes, M. Lohnes, J. Stebbins, and the Sheriff serving during the relevant period.

Please serve complete, verified answers to the interrogatories and a complete production within the time provided by Federal Rules of Civil Procedure 33 and 34, including any additional time applicable to service by mail under Rule 6(d). A consolidated response is acceptable if it clearly states which Defendant supplies or adopts each response and if the interrogatory answers are properly verified under oath.

Please also preserve all responsive paper and electronic records, including staff and post assignments, Smart Communications audit trails, maintenance and plumbing records, recreation logs, food and water records, rounds and welfare-check logs, lock-repair records, body-camera assignment information, and records held by contractors or vendors. If a responsive record no longer exists, please identify the custodian, the search performed, the retention policy, and the date and manner of any destruction or loss.

Because the identification deadline is close, prompt rolling responses are requested as records are located. Nothing in this request seeks unrelated merits discovery; the requests are confined to identifying the people and entities connected to the conditions of confinement that remain in this case.

Sincerely,

/s/ Jason Matthew Lynch, Pro Se

Enclosures:

- Plaintiff's First Set of Interrogatories Limited to Doe Identification
- Plaintiff's First Requests for Production Limited to Doe Identification

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

**Case No.
4:26-cv-00118-JM-JJV**

JASON MATTHEW LYNCH,
Plaintiff,

v.

**WHITE COUNTY, ARKANSAS;
CLAYTON
EDWARDS; HANNAH ROSS; SERGEANT
SWINDLE; JOHN DOES 1-10; JANE DOES
1-10; and SHERIFF OF WHITE COUNTY,**
Defendants.

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
FIRST REQUESTS FOR PRODUCTION LIMITED TO
IDENTIFICATION OF DOE DEFENDANTS**

(Fed. R. Civ. P. 26, 33, and 34 - For Service Only; Not for Filing)

TO: Defendants White County, Arkansas; Clayton Edwards; Hannah Ross; and Sergeant Swindle, through counsel Kaylen Suzanne Lewis.

PURPOSE AND LIMITED SCOPE. These discovery requests are limited to identifying the unknown Doe Defendants, witnesses, record custodians, contractors, and decision-makers connected to the conditions of confinement that remain in this action. The Court has described the remaining case as involving alleged exposure to sewage, feces, blood, and black mold; forced sleeping on concrete or without a bunk; unsafe drinking water and inadequate nutrition; and lack of adequate exercise or yard call. The requests also seek identification relating to the allegedly malfunctioning Cell F-4 lock and sanitation response because those matters concern the same unsafe housing conditions. Plaintiff does not seek unrelated medical, religious, damages, or general merits discovery through this packet.

RESPONSE TIME. Serve written answers and responses within thirty (30) days after service, subject to any additional time provided by Rule 6(d) for service by mail. Responses should be served directly on Plaintiff and should not be filed unless later used in a proceeding or ordered filed by the Court.

I. DEFINITIONS

1. **"Plaintiff"** means Jason Matthew Lynch.
2. **"WCDC"** means the White County Detention Center, including its housing pods, cells, dayrooms, showers, control rooms, maintenance areas, food-service areas, recreation areas, and administrative systems.
3. **"Relevant Period"** means June 9, 2024 through September 9, 2024, inclusive.
4. **"Plaintiff's Housing Unit"** means Pod F, its dayroom and shower, Cell F-4, and any temporary or alternate WCDC housing area in which Plaintiff was placed during the Relevant Period, but only to the extent the same Subject Conditions were present or staff responsibility overlapped.
5. **"Subject Conditions"** means: (a) sewage, feces, blood, black mold, shower or plumbing backups, inadequate sanitation, and inadequate cleaning supplies; (b) sleeping on concrete, on the floor, or without an assigned bunk; (c) unsafe, unavailable, contaminated, or scalding drinking water and inadequate or contaminated food or nutrition; (d) denial or cancellation of exercise or yard call; and (e) the allegedly malfunctioning Cell F-4 door lock.
6. **"Identify, when referring to a person"** means state the person's full legal name, any name or initials used in WCDC records, badge or employee number (or trustee/inmate worker number, if applicable), employer, rank or job title, department, dates and shifts worked, post or assignment, and current business address. If a personal service address is needed and is confidential, state whether counsel will accept service or will provide the address under seal or directly to the U.S. Marshal.
7. **"Identify, when referring to an entity"** means state the full legal name, business address, telephone number, role, and the name and title of the person most knowledgeable about the matter.
8. **"Document"** includes all paper and electronically stored information, including rosters, schedules, logs, reports, work orders, inspection forms, emails, texts, Smart Communications records, kiosk records, database entries, audit trails, video indexes, body-camera assignment logs, photographs, recordings, policies, and metadata.

9. **"You or Defendants"** means the responding Defendants and their officers, employees, departments, agents, contractors, vendors, record custodians, and persons acting on their behalf, to the extent information is within their possession, custody, or control.

II. GENERAL INSTRUCTIONS

1. **Instruction.** Answer each interrogatory separately and fully in writing under oath. Each individual Defendant must sign a verification, or Defendants may serve a consolidated verified response that clearly identifies the person verifying the information and the Defendants who adopt each answer.
2. **Instruction.** Conduct a reasonable inquiry of personnel, payroll, duty-roster, jail-management, Smart Communications, maintenance, food-service, recreation, control-room, video, and contractor records. Do not limit the search to documents personally known to one named Defendant.
3. **Instruction.** If an objection is made, state the specific basis and answer the portion not subject to the objection. A general or boilerplate objection does not excuse a response to the non-objectionable portion.
4. **Instruction.** If relying on business records under Rule 33(d), identify the exact record, Bates number, page, row, date, and field from which the answer may be derived. Referring Plaintiff to an undifferentiated employee list or a mass of records is not a sufficient response.
5. **Instruction.** If the full answer is unknown, state what is known, describe every reasonable effort made to obtain the information, identify the custodian or person believed to have the information, and explain why the remainder cannot be supplied.
6. **Instruction.** When names are similar, use full legal names and distinguish the people by badge or employee number, job title, dates, shifts, and assignments. Do not answer only with a first initial, last name, or list of possible people.
7. **Instruction.** These requests are continuing. Supplement any incomplete or incorrect response as required by Rule 26(e), including when later review identifies another person, assignment, or responsive record.
8. **Instruction.** For any information withheld on privilege grounds, identify the nature of the information and provide a privilege log sufficient to evaluate the claim without disclosing the privileged substance.
9. **Instruction.** Personal Social Security numbers, dates of birth, home telephone numbers, and unrelated medical information may be redacted. Do not redact full names, titles, badge or employee numbers, employers, dates, shifts, assignments, or business/service information needed to identify and serve a Doe Defendant.

III. PLAINTIFF'S FIRST INTERROGATORIES TO DEFENDANTS

Interrogatory No. 1 - Staff Assigned to Plaintiff's Housing Unit. Identify every correctional officer, supervisor, jailer, control-room officer, trustee or inmate worker, contractor, maintenance worker, food-service worker, or other staff member who was assigned to, worked a post in, entered, conducted duties in, or had responsibility for Plaintiff's Housing Unit during the Relevant Period. For each person, state the person's unit or post, dates, shifts, and specific duty or interaction.

Interrogatory No. 2 - Supervisory Chain of Command. Identify the full supervisory chain of command for Plaintiff's Housing Unit for each shift during the Relevant Period, including the Sheriff, jail administrator, Captain, Lieutenant, Sergeant, acting supervisor, shift commander, control-room supervisor, and any person who temporarily filled one of those roles.

Interrogatory No. 3 - Maintenance and Sanitation Personnel. Identify every employee, contractor, vendor, trustee or inmate worker, supervisor, or other person responsible for reporting, inspecting, cleaning, repairing, approving work on, or remediating sewage or shower backups, plumbing leaks, black mold, sanitation hazards, pipe chases, contaminated areas, or cleaning-supply shortages in Plaintiff's Housing Unit during the Relevant Period. State the dates and nature of each person's responsibility.

Interrogatory No. 4 - Recreation and Yard-Call Responsibility. Identify every person responsible for scheduling, approving, supervising, recording, cancelling, limiting, or denying recreation or yard call for Plaintiff's Housing Unit during the Relevant Period. For each person, state the dates or shifts of responsibility and whether the person approved or recorded any cancellation or denial affecting Plaintiff or Pod F.

Interrogatory No. 5 - Food and Water Responsibility. Identify every person responsible for meal preparation, meal distribution, replacement of spoiled or contaminated trays, nutritional oversight, plumbing or water-system maintenance, potable-water oversight, water-temperature complaints, or drinking-water access for Plaintiff's Housing Unit during the Relevant Period, including responsibility for Cell F-4.

Interrogatory No. 6 - Grievance and Request Routing. Identify every person who received, viewed, routed, assigned, investigated, reviewed, responded to, approved, closed, appealed, or audited any grievance, kiosk request, maintenance request, or complaint submitted by Plaintiff concerning any Subject Condition. For each person, state the request or grievance number, date, subject, and action taken.

Interrogatory No. 7 - Cell Entry, Rounds, and Welfare Checks. Identify every person who conducted security rounds, welfare checks, head counts, inspections, cell entries, pod walkthroughs, or supervisory rounds in Plaintiff's Housing Unit during the Relevant Period. State the dates and shifts and identify the corresponding log, video, or record.

Interrogatory No. 8 - Cell F-4 Lock. Identify every person who inspected, tested, reported, documented, approved repair of, scheduled repair of, repaired, declined to repair, or was notified about the allegedly malfunctioning Cell F-4 door lock during the Relevant Period. State the date, action taken, work-order number, and supervisor notified.

Interrogatory No. 9 - Lt. S. Hughes / Stevie Hughes. Identify the full legal name, badge or employee number, rank, employer, dates and shifts, and unit responsibilities of the person identified in grievance or request records as "Lt. S. Hughes." State whether that person is Stevie Hughes and describe the person's role in Plaintiff's Housing Unit, grievance handling, recreation, sanitation, food, water, or other Subject Conditions.

Interrogatory No. 10 - M. Lohnes and Maintenance Responses. Identify the full legal name, badge or employee number, job title, employer, dates and shifts, and unit responsibilities of the person identified in maintenance records as "M. Lohnes." State whether that person is Marty Lohnes and identify every maintenance request or work order involving Plaintiff's Housing Unit that the person received, reviewed, answered, assigned, or completed.

Interrogatory No. 11 - Similar or Potentially Confused Names. Identify and distinguish: (a) Lieutenant Hannah Ross from Richard Ross; (b) Clayton Edwards from Jeremy Edwards; and (c) Sergeant Swindle from any other employee with the same or similar surname. For each, state the full legal name, badge or employee number, title, dates and shifts, and any responsibility for Plaintiff's Housing Unit or the Subject Conditions.

Interrogatory No. 12 - J. Stebbins and the 2024 Sheriff. Identify the full legal name, title, employer, dates and shifts, and relevant responsibilities of the person identified in records as "J. Stebbins." Also identify the person who served as Sheriff of White County during the Relevant Period, state whether that person was Phillip Miller, and provide the Sheriff's dates of service and official business address.

Interrogatory No. 13 - Persons with Notice of the Subject Conditions. Identify every person whom Plaintiff, another inmate, a trustee, an employee, a contractor, or a supervisor notified about any Subject Condition, or who learned of a Subject Condition through rounds, inspection, video, grievance, work order, report, or direct observation. For each person, state the condition, date, method of notice, and action taken.

Interrogatory No. 14 - Contractors, Vendors, and Record Custodians. Identify every outside contractor or vendor and every WCDC record custodian responsible for maintenance, plumbing, mold or environmental remediation, food service, water systems, recreation records, Smart Communications or grievance data, staffing and post assignments, rounds logs, lock records, surveillance video, or body-camera assignments during the Relevant Period.

Interrogatory No. 15 - Service Information for Identified Doe Defendants. For every person identified in response to these interrogatories who is no longer employed at WCDC or whose business address is not WCDC, state the person's current employer and business address and whether defense counsel will accept service. If a confidential personal address is necessary for service, state whether Defendants will provide it under seal to the Clerk or directly to the U.S. Marshal rather than disclose it publicly to Plaintiff.

Verification Reminder: Under Rule 33(b), the person who answers the interrogatories must sign the answers under oath, and counsel must sign any objections.

PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION LIMITED TO IDENTIFICATION OF DOE DEFENDANTS

(Fed. R. Civ. P. 26 and 34 - For Service Only; Not for Filing)

INCORPORATION. The Definitions, General Instructions, Relevant Period, Plaintiff's Housing Unit, and Subject Conditions stated above are incorporated into these Requests for Production.

IV. PRODUCTION INSTRUCTIONS

- 1. Production Instruction.** Produce documents as kept in the ordinary course of business or organize and label them to correspond to each request. Use consecutive Bates numbers.
- 2. Production Instruction.** Produce searchable PDF copies of paper records. Produce spreadsheets, database exports, audit trails, schedules, and logs in native or reasonably usable electronic format, including the fields showing user, date, time, assignment, status, and action. Do not convert native spreadsheets or audit logs into unreadable images.
- 3. Production Instruction.** For photographs, audio, video, and body-camera materials, preserve original metadata and provide an index identifying date, time, camera, officer assignment, location, and file name. Production may be by secure electronic media or another agreed method.
- 4. Production Instruction.** If a document contains responsive and nonresponsive material, redact only the nonresponsive confidential information and identify the basis for each redaction. Do not redact names, titles, employee numbers, dates, shifts, post assignments, or actions needed to identify a person.
- 5. Production Instruction.** If no responsive document exists, state that fact in the written response after reasonable inquiry. Identify the records searched, the custodian, the retention policy, and whether responsive records were lost, deleted, overwritten, or destroyed.
- 6. Production Instruction.** Produce responsive documents in Defendants' possession, custody, or control, including documents held by WCDC departments, White County, Smart Communications, maintenance contractors, plumbing contractors, food-service providers, water-system personnel, and other vendors.

V. REQUESTS FOR PRODUCTION

Request for Production No. 1 - Staff Rosters. Produce all staff rosters, employee attendance reports, payroll attendance reports, and contractor or trustee assignment lists for the Relevant Period that are sufficient to identify every person assigned to or working in Plaintiff's Housing Unit. A facility-wide list is not sufficient unless it shows unit, post, date, and shift.

Request for Production No. 2 - Shift Logs and Post Assignments. Produce all daily shift logs, post assignment sheets, watch-command reports, briefing sheets, control-room assignments, relief logs, and supervisor assignments for Plaintiff's Housing Unit during the Relevant Period.

Request for Production No. 3 - Maintenance, Sewage, Mold, and Sanitation Records. Produce all maintenance logs, work orders, plumbing records, sewage or shower-backup reports, black-mold or environmental inspection records, sanitation inspection sheets, cleaning-supply issuance records, pipe-chase records, trustee work assignments, photographs, and completion or closure records concerning Plaintiff's Housing Unit during the Relevant Period.

Request for Production No. 4 - Recreation and Yard-Call Records. Produce all recreation schedules, yard-call schedules, cancellation or denial logs, reasons for cancellation, officer sign-off sheets, pod movement logs, recreation incident reports, and supervisory approvals affecting Plaintiff's Housing Unit during the Relevant Period.

Request for Production No. 5 - Food and Water Records. Produce all meal-distribution logs, tray-replacement or complaint records, food-service staffing records, menus and nutrition-oversight records sufficient to identify responsible personnel, water-quality or potability records, water-temperature complaints, plumbing records, and water-maintenance work orders affecting Plaintiff's Housing Unit or Cell F-4 during the Relevant Period.

Request for Production No. 6 - Grievances, Requests, and Routing Audit Trails. Produce every grievance, appeal, kiosk request, maintenance request, complaint, response, attachment, and routing or audit record submitted by Plaintiff concerning any Subject Condition. Include the record showing each user who viewed, received, assigned, forwarded, investigated, responded to, approved, closed, reopened, or appealed the item, with dates and times.

Request for Production No. 7 - Cell Entry, Rounds, and Welfare-Check Logs. Produce all pod-round logs, cell-check logs, welfare-check logs, security-round logs, head-count sheets, inspection logs, electronic checkpoint records, unit logbooks, and records of entries into Plaintiff's Housing Unit during the Relevant Period.

Request for Production No. 8 - Cell F-4 Lock Records. Produce all complaints, inspection records, incident reports, work orders, emails, messages, repair tickets, parts records, completion records, photographs, and supervisor notifications relating to the Cell F-4 door lock during the Relevant Period.

Request for Production No. 9 - Command Structure and Post Orders. Produce organization charts, command rosters, job descriptions, post orders, shift-command policies, and documents sufficient to identify the Sheriff, jail administrator, Captain, Lieutenants, Sergeants, acting supervisors, control-room supervisors, maintenance supervisors, food-service supervisors, and recreation supervisors responsible for Plaintiff's Housing Unit during the Relevant Period.

Request for Production No. 10 - Records Confirming Full Names and Distinguishing Similar Names. Produce documents sufficient to confirm the full legal names, titles, badge or employee numbers, employers, and Relevant-Period assignments of Lt. H. Ross / Hannah Ross, Richard Ross, Lt. S. Hughes / Stevie Hughes, Clayton Edwards, Jeremy Edwards, Sergeant Swindle, M. Lohnes / Marty Lohnes, J. Stebbins / Jackie Stebbins, and Sheriff Phillip Miller or the person who served as Sheriff during the Relevant Period.

Request for Production No. 11 - Smart Communications and Electronic-System Identification Records. Produce user-account lists, role and permission lists, audit trails, assignment-group records, routing rules, and other records sufficient to identify the individuals behind initials, usernames, titles, or group names appearing in Plaintiff's grievances, requests, maintenance messages, or responses concerning the Subject Conditions.

Request for Production No. 13 - Contractor and Vendor Records. Produce contracts, work orders, service tickets, invoices, dispatch records, vendor reports, and personnel-assignment records sufficient to identify every outside contractor or vendor and the specific workers who performed plumbing, sewage, mold, sanitation, water, food-service, lock, or environmental work affecting Plaintiff's Housing Unit during the Relevant Period.

Request for Production No. 14 - Employment Status and Service Information. Produce documents sufficient to show the current employment status and business/service address of each person identified as a potential Doe Defendant. Personal home addresses may be withheld from Plaintiff if Defendants instead provide them under seal to the Clerk or directly to the U.S. Marshal and state that they have done so.

Request for Production No. 15 - Missing, Destroyed, or Unavailable Identification Records. For any category above in which responsive records no longer exist, produce the applicable retention policy, deletion or destruction log, litigation-hold notice, overwrite schedule, and documents sufficient to identify who authorized or performed the deletion, destruction, or overwrite and when it occurred.

Respectfully submitted,

/s/ Jason Matthew Lynch, Pro Se
261 Wilson Loop
Ward, Arkansas 72176
Telephone: 501-605-4481

A handwritten signature in black ink, appearing to read "Jason M. Lynch". The signature is fluid and cursive, with the first name "Jason" and last name "Lynch" clearly distinguishable.

