

TRULINCS 07405510 - LYNCH, JASON M - Unit: ERE-D-A

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAR 16 2026

TAMMY H. DOWNS, CLERK
By:  DEP. CLERK

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

Jason Matthew Lynch, Reg. No. 07405-510
Plaintiff, Pro Se

4:24-cv-00740-LPR-BBM

v.

White County Jail, et al.
Defendants

PLAINTIFF'S MOTION TO COMPEL DEFENDANTS TO PROVIDE A GOOD-FAITH ANSWER OR, IN THE ALTERNATIVE,
FOR LEAVE TO SERVE TARGETED REQUESTS FOR ADMISSION AND COMMENCE DISCOVERY

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully moves this Court for an order requiring Defendants to provide a complete and good-faith answer to the Third Amended Complaint ("TAC") or, alternatively, permitting Plaintiff to immediately proceed with Requests for Admission and discovery to clarify the issues in dispute.

This motion is brought pursuant to Federal Rules of Civil Procedure 8, 26, 33, 34, 36, and 37.

I. INTRODUCTION

This case involves serious allegations of constitutional violations at the White County Jail in Searcy, Arkansas, including:

- denial of necessary medical treatment
- interference with legal mail and access to courts
- retaliation
- religious discrimination
- unconstitutional jail policies

The Court has already screened Plaintiff's complaint under 28 U.S.C. §1915A and allowed these claims to proceed.

Despite this, Defendants have responded with a boilerplate answer denying nearly every allegation without meaningful explanation, while simultaneously seeking procedural delays.

Such responses frustrate the purpose of the Federal Rules of Civil Procedure and obstruct the orderly progress of litigation.

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II. DEFENDANTS ARE REQUIRED TO PROVIDE A GOOD-FAITH ANSWER

Federal Rule of Civil Procedure 8(b) requires defendants to:

> "Admit or deny the allegations asserted against them."

Rule 8(b)(2) further requires that denials fairly respond to the substance of the allegation.

Defendants cannot simply issue blanket denials without addressing the factual substance of the complaint.

Courts have repeatedly held that evasive or boilerplate responses do not satisfy Rule 8.

See:

Zotos v. Lindbergh School District, 121 F.3d 356 (8th Cir. 1997).

III. DEFENDANTS' BOILERPLATE DENIALS PREVENT MEANINGFUL LITIGATION

Defendants' answer appears to:

- deny virtually all allegations without explanation
- assert generic affirmative defenses
- avoid addressing the factual basis of Plaintiff's claims

Such conduct makes it impossible for Plaintiff to determine:

- what facts are actually disputed
- what evidence must be gathered
- which defendants are responsible

Courts have recognized that pleadings must provide fair notice of the issues in dispute.

IV. REQUESTS FOR ADMISSION ARE APPROPRIATE WHERE DEFENDANTS REFUSE TO CLARIFY FACTS

Federal Rule of Civil Procedure 36 permits a party to serve Requests for Admission regarding:

- facts
- application of law to fact
- authenticity of documents

Requests for Admission are particularly appropriate where defendants issue blanket denials.

See:

American Automobile Association (Inc.) v. AAA Legal Clinic, 930 F.2d 1117 (5th Cir. 1991)
(recognizing Rule 36 as a tool to narrow disputed issues).

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Allowing Plaintiff to serve targeted admissions would significantly narrow the issues for trial and prevent unnecessary delay.

V. DISCOVERY SHOULD COMMENCE WITHOUT FURTHER DELAY

Federal Rule of Civil Procedure 26(d) allows the Court to control the timing and sequence of discovery.

Because this case has already experienced significant delays, Plaintiff respectfully requests permission to proceed with:

- Interrogatories (Rule 33)
- Requests for Production (Rule 34)
- Requests for Admission (Rule 36)

Without further delay.

VI. PLAINTIFF IS WILLING TO WAIVE FORMAL DISCOVERY CONFERENCING

Federal Rule of Civil Procedure 26(f) normally requires parties to conduct a discovery conference.

However, Plaintiff respectfully waives the requirement for a formal conference if the Court deems it appropriate in order to allow discovery to proceed with all possible haste.

This request is made because:

- Plaintiff is incarcerated
- communication with defense counsel is limited
- the case has already been delayed significantly

Courts have discretion to modify discovery procedures to accommodate incarcerated litigants.

VII. EVIDENCE PRESERVATION AND SPOILIATION CONCERNS

Plaintiff has previously placed Defendants on notice that litigation was anticipated as early as September 2024.

Once a party is placed on notice of litigation, they have a duty to preserve relevant evidence.

See:

Stevenson v. Union Pacific Railroad Co., 354 F.3d 739 (8th Cir. 2004).

The Eighth Circuit held that parties who destroy or fail to preserve evidence after litigation notice may face sanctions for spoliation.

Given the statements previously made by Defendants that evidence might never reach the courtroom or public view, Plaintiff respectfully requests that the Court ensure that all evidence related to this case is preserved.

VIII. REQUESTED RELIEF

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Plaintiff respectfully requests that the Court:

1. Order Defendants to file a complete and good-faith answer addressing the factual allegations in the Third Amended Complaint;

OR

2. Grant Plaintiff leave to immediately serve Requests for Admission addressing each claim in the complaint;

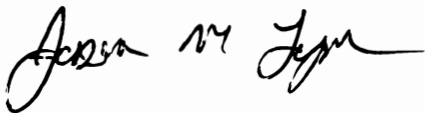
3. Permit Plaintiff to proceed with discovery under Rules 33, 34, and 36 without further delay;

4. Issue an order reminding Defendants of their duty to preserve all relevant evidence;

5. Grant any additional relief the Court deems just and proper.

Respectfully submitted,

Jason Matthew Lynch
Reg. No. 07405-510
Plaintiff, Pro Se



1. Memorandum opposing late filing

2. Motion to Strike their Answer

3. Rule 55 Default Framework

4. Motion to Compel Good-Faith Answer or Allow Admissions

I pray the Court to confront:

their late filing
their inadequate answer
potential default
immediate discovery

This combination is very difficult for defendants to avoid addressing.