

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

JASON LYNCH

PLAINTIFF

vs.

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

**CLAYTON EDWARDS;
LT. HANNAH ROSS; CONNER GOODWIN;
ZACHARY RODGERS;
and SGT. SWINDLE**

DEFENDANTS

ANSWER

Come now the Defendants, Clayton Edwards, in his official and individual capacities, and Lt. Hannah Ross, Conner Goodwin, Zachary Rodgers, and Sgt. Swindle, in their individual capacity, and for their Answer to Plaintiff's Third Amended Complaint (Doc. No. 45), does state the following:

1. The Defendants deny, as pleaded, the allegations in the Plaintiff's Third Amended Complaint.
2. The Defendants respectfully demand a jury trial on all genuine issues of material fact.
3. The Defendants specifically and expressly deny each and every allegation not specifically and expressly admitted in this Answer.
4. The Defendants assert and reserve the right to file an amended Answer or other appropriate pleadings and to allege any affirmative defenses that might be available after a reasonable opportunity to investigate the allegations set forth in Plaintiff's Third Amended Complaint.

AFFIRMATIVE DEFENSES

5. The Defendants assert the following affirmative defenses:
 - A. Punitive damages immunity, *see City of Newport v. Fact Concerts, Inc.*, 453 U.S. 247, 69 L.Ed.2d 616, 101 S.Ct. 2748 (1981);
 - B. Qualified immunity, *see, e.g., Pearson v. Callahan*, 555 U.S. 223 (2009);
 - C. Immunity from "suit for damages," tort immunity and statutory tort immunity, *see, e.g., Ark. Code Ann. §21-9-301*;

- D. Sovereign immunity;
- E. Vicarious liability/respondeat superior immunity and statutory vicarious liability/respondeat superior immunity, *see* Ark. Code Ann. § 21-9-301;
- F. The Defendants are not proper a party to a tort action in any event, *see* Ark. Code Ann. § 23-79-210
- G. Justification in every applicable form;
- H. Privilege in every applicable form;
- I. Mootness, as applicable;
- J. Waiver/Estoppel/Laches, as applicable;
- K. Self defense and defense of others;
- L. Offset/Setoff;
- M. No constitutional liability for negligence;
- N. Assumption of Risk, as applicable;
- O. Unclean Hands, as applicable;
- P. Comparative Fault and Contributory Negligence by the Plaintiff;
- Q. No subject matter jurisdiction;
- R. *Heck v. Humphrey* and collateral estoppel and res judicata, as applicable;
- S. No standing, as applicable;
- T. The Defendants avail themselves of all applicable defenses under Rules 8 and 12 of the Federal Rules of Civil Procedure;
- U. All applicable immunities and the acquired immunity doctrine, as applicable;
- V. Common defense doctrine, as applicable;
- W. The Plaintiff has failed to state a claim upon which relief can be granted;
- X. The Defendants avail themselves of all statute of limitations defenses applicable to this claim, including, but not limited to Ark. Code Ann. 16-56-101, *et seq.*;
- Y. The Defendants reserve and preserve the right to assert any available

counterclaims and/or third-party claims under Fed. R. Civ. Proc. 13 & 14;

- Z. The Defendants avail themselves of all applicable provisions of the Prison Litigation Reform Act (PLRA), including, but not limited to any applicable restrictions on attorneys' fees, the exhaustion of remedies requirement, and the proof of physical injury requirement.

WHEREFORE, the Defendants pray that the Plaintiff's Third Amended Complaint be dismissed and for any and all other just and proper relief to which she is entitled.

Respectfully submitted,

CLAYTON EDWARDS, in his individual and official capacities; LT. HANNAH ROSS; CONNER GOODWIN; ZACHARY RODGERS; and SGT. SWINDLE, in their individual capacity, *Defendants*

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2026, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system, and I mailed the document by United States Postal Service to the following non CM/ECF participant:

Jason Lynch
Reg #07405-510
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Federal Correctional Institution
Inmate Mail/Parcels
P.O. Box 1500
El Reno, OK 73036

Kaylen S. Lewis
Kaylen S. Lewis