

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

SUBJECT: RE: Requested List of Defendants in Jm-JJV (WDCD)
DATE: 04/11/2026 07:06:04 PM

4:26-cv-00118-JM-JJV

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS CENTRAL DIVISION

Jason Matthew Lynch, Plaintiff

v.
White County Jail, et al., Defendants

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

APR 17 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

PLAINTIFF'S SUPPLEMENTAL IDENTIFICATION OF DEFENDANTS

(Pursuant to Court's Order Requesting Identification of Defendants)

INTRODUCTORY STATEMENT

Plaintiff, Jason Matthew Lynch, respectfully submits the following list of identified Defendants in compliance with the Court's request.

Plaintiff states at the outset:

He is a pro se litigant with limited access to records and identifying information

Many relevant identities remain within the exclusive control of Defendants

Without narrow, targeted discovery, it is extremely difficult to fully identify all John/Jane Doe Defendants

Nevertheless, Plaintiff has made a good faith effort to identify all individuals known to him at this time.

Plaintiff respectfully renews his request for limited early discovery solely for the purpose of identifying unknown Defendants.

I. SUPERVISORY / POLICYMAKING DEFENDANTS

1. White County Sheriff (Name Unknown 2024)

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

(To be identified through discovery)

Basis for Inclusion:

The Sheriff is the final policymaker for the jail and is responsible for:

Oversight of jail operations

Implementation and enforcement of policies

Ensuring constitutional conditions of confinement

Supervision of staff and command personnel

Legal Grounds:

Under Monell liability, a supervisor may be held liable where:

They knew of unconstitutional conditions

Failed to act or correct them

Maintained policies or customs that caused harm

Factual Basis:

Plaintiff alleges the Sheriff:

Had actual or constructive knowledge of:

Sewage overflows

Human waste exposure

Unsanitary medical conditions

Lack of potable water

Overcrowding and unsafe conditions

Failed to intervene or correct these conditions

Allowed unconstitutional practices to continue

The Sheriff is properly named due to policy-level responsibility and deliberate indifference.

2. Clayton Edwards (Current Sheriff / Former Command Staff)

Basis for Inclusion:

Clayton Edwards

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

Mr. Edwards is a final decision-maker and policymaker who:

Had direct knowledge of Plaintiff's conditions

Possessed authority to correct them

Failed to act

Factual Allegations:

Knew of:

Lack of cleaning supplies

Sewage exposure

Human waste in housing and medical areas

Had authority over:

Jail operations

Staff conduct

Sanitation policies

Took no corrective action

Liability attaches under:

Supervisory liability

Policy/custom (Monell)

Deliberate indifference

3. Lt. Hannah Ross

Basis for Inclusion:

Hannah Ross

Lt. Ross was a command-level officer responsible for:

Daily jail operations

Staff supervision

Implementation of sanitation and housing decisions

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

Factual Allegations:

Direct knowledge of:

Sewage overflow

Blood and human waste in medical areas

Lack of sanitation supplies

Authority to:

Issue corrective orders

Escalate issues to command staff

Failed to act despite knowledge

Proper Defendant under:

Direct participation

Failure to intervene

Supervisory liability

II. MEDICAL DEFENDANTS

4. Ashley Watts (Head Nurse / Medical Administrator)

Basis for Inclusion:

Ashley Watts

Ms. Watts was the medical supervisor responsible for:

Oversight of medical care

Conditions within medical lockdown

Patient safety and sanitation

Factual Allegations:

Knew of:

Soiled diapers in shower areas for extended periods

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

Blood and human waste contamination

Unsanitary medical lockdown conditions

Failed to:

Ensure sanitary medical environment

Protect inmate health

Correct hazardous conditions

Liability arises under:

Deliberate indifference to serious medical needs

Failure to maintain sanitary medical conditions

5. Turn Key Health Clinics, LLC (Medical Contractor)

Turn Key Health Clinics LLC

Reason Added (if not already listed):

This entity is commonly responsible for:

Staffing medical personnel

Establishing medical policies

Overseeing inmate care

Basis for Liability:

Corporate policy/custom contributing to:

Inadequate care

Unsanitary medical conditions

Failure to train or supervise staff

Proper Defendant under Monell-type corporate liability.

III. MAINTENANCE / FACILITY DEFENDANTS

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

6. John Doe Maintenance Supervisor

Basis for Inclusion:

Unidentified individual responsible for:

Facility maintenance

Plumbing systems

Air quality and sanitation systems

Factual Allegations:

Failed to:

Address sewage backup issues

Repair unsafe cell conditions (Cell F-4)

Maintain drinkable water access

Prevent mold and contamination

Liability based on:

Failure to maintain safe conditions

Deliberate indifference to environmental hazards

IV. CORRECTIONAL STAFF DEFENDANTS

7. Sergeants and Officers (Direct Participants)

Named Individuals:

Sgt. Swindle

Sgt. Rogers

Sgt. Siler

Sgt. Woody

Sgt. Workman

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

CO Wood

CO Wilborn

CO Martin (or Martian exact spelling to be confirmed)

Basis for Inclusion:

These officers had direct, personal involvement in unconstitutional acts.

Factual Allegations:

They:

Restrained Plaintiff to a metal bench during exercise

Placed additional physical restraints (leg chain) restricting movement

Were physically present in housing units

Personally observed:

Sewage conditions

Blood and human waste

Lack of potable water

Overcrowding

Served spoiled or unsafe food

Failed to:

Report conditions

Intervene

Correct violations

Legal Basis:

Liability attaches for:

Direct participation in unconstitutional conditions

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

Failure to intervene

Excessive restraint / punitive conditions

Deliberate indifference

V. ADDITIONAL DOE DEFENDANTS

8. John/Jane Does (To Be Identified Through Discovery)

Includes:

Additional correctional officers

Medical personnel

Supervisors not yet identified

Administrative staff involved in policy decisions

Reason for Inclusion:

Plaintiff lacks access to:

Employment rosters

Incident reports

Medical staffing records

Identification requires limited discovery.

VI. REQUEST FOR LIMITED DISCOVERY

Plaintiff respectfully states:

Without targeted discovery, it is impossible to fully identify all responsible parties, as:

Records are controlled by Defendants

Plaintiff had no access to names, logs, or documentation

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

Plaintiff Requests:

Leave to conduct limited early discovery for:

Staff rosters (June September 2024)

Medical staffing assignments

Maintenance personnel identification

Incident and grievance logs

VII. CONCLUSION

Plaintiff submits this list in good faith compliance with the Court's directive.

This submission is:

Not intended to harass

Not intended to burden the Court

Made to the best of Plaintiff's knowledge without discovery

Plaintiff respectfully requests:

Acceptance of this list

Permission for limited discovery to identify remaining Defendants

