

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

SUBJECT: RE: emergency Motion
DATE: 04/11/2026 07:06:04 PM

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

4:24-cv-00740-LPR-BBM

EMERGENCY MOTION FOR LEAVE TO FILE,

MOTION FOR PROTECTIVE ORDER,

AND EMERGENCY MOTION FOR INJUNCTIVE RELIEF

INTRODUCTORY REQUEST FOR LEAVE

Plaintiff, Jason Matthew Lynch, respectfully prays this Court for leave to file this emergency motion.

Plaintiff apologizes to this Honorable Court for submitting another pleading after previously being instructed to stand down. However, circumstances have rapidly changed, and Plaintiff now fears for his safety and life.

Plaintiff states in good faith:

> Something improper and potentially nefarious is occurring, and Plaintiff does not know what else to do.

Plaintiff is actively attempting to retain counsel; however, that process may take several days time Plaintiff does not have given the immediacy of the threat.

I. EMERGENCY NATURE OF THIS MOTION

Plaintiff has learned that Defendants and/or their counsel have obtained or are attempting to execute a civil writ to take Plaintiff into custody of White County for a purported trial date of May 14, 2026.

This action:

Appears to bypass state and federal procedural law

Constitutes a trial by surprise

Raises serious concerns of retaliation and harm

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II. REQUESTED RELIEF

Plaintiff respectfully requests that this Court:

1. Issue an Immediate Protective Order

Prohibiting all named Defendants in Plaintiff's federal and state cases from:

Direct or indirect contact with Plaintiff

Causing or facilitating Plaintiff's transfer to White County Jail

Interfering with Plaintiff's safety, legal access, or medical care

2. Issue an Emergency Injunction

Ordering that:

The Federal Bureau of Prisons, including the Warden of
Federal Correctional Institution El Reno

NOT release Plaintiff to White County authorities pursuant to any civil writ

3. Alternatively Order

Any required appearance be conducted via video or telephone, OR

That only the United States Marshals Service transport Plaintiff

And that Plaintiff not be housed at White County Jail under any circumstances

III. FACTUAL BASIS

A. Prior Removal for Safety (Critical Fact)

In September 2024, Plaintiff and his family notified the federal court that:

Plaintiff was in imminent danger

Conditions at White County Jail threatened his life

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Plaintiff's mother personally contacted court staff to report the danger.

Within days:

Plaintiff was removed from White County Jail and transferred for safety.

Allowing Plaintiff to be returned now would:

Undermine that prior protective action

Expose Plaintiff to the same dangers already recognized

B. Active Federal Civil Rights Litigation

Plaintiff currently has active claims under:

42 U.S.C. § 1983

42 U.S.C. § 1985

These claims involve:

Retaliation

Denial of medical care

Dangerous conditions of confinement

Returning Plaintiff to the custody of those same Defendants creates:

A grave risk of retaliation and further harm

C. Improper "Trial by Surprise" in State Case

Plaintiff has been informed:

A trial is set for May 14, 2026

No proper service has occurred

No answers have been filed

No discovery has taken place

The scheduling order:

Contains no provisions for service

Contains no deadlines for pleadings

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Skips all discovery phases

Sets a trial within ~30 days

This violates fundamental procedural rules, including:

Notice and opportunity to be heard

Discovery rights

Due process guarantees

Why This Is Improper

Under both federal and Arkansas civil procedure:

Cases require service of process

Defendants must file responsive pleadings

Parties are entitled to discovery

Courts do not proceed directly to trial without these steps

This "trial setting" is procedurally defective and legally improper

D. Retaliation and Litigation Interference Risk

Plaintiff fears that if returned to White County Jail:

He will be placed in lockdown

Denied access to:

Courts

Legal materials

Phone

Family

This would:

Interfere with ongoing federal litigation

Prevent Plaintiff from prosecuting his claims

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Potentially coerce dismissal or abandonment

E. Interference with Federal Sentence and Liberty Interests

Plaintiff is a federal inmate under the authority of:

18 U.S.C. § 3621

Plaintiff is:

Within ~30 days of release / home confinement

Completing RDAP/NRDAP programming

Eligible for First Step Act benefits

Execution of this writ would:

Interrupt federally mandated programming

Delay release

Extend custody beyond congressional intent

This creates a serious liberty interest violation

F. Medical Risk

Plaintiff is currently undergoing:

Medical evaluation, including a pending PET scan

Treatment related to prior denial of care

Transfer would:

Interrupt medical continuity

Place Plaintiff at further health risk

IV. LEGAL BASIS FOR RELIEF

Plaintiff satisfies the requirements for emergency injunctive relief:

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1. Likelihood of Success

Active constitutional claims already allowed to proceed

Documented pattern of misconduct

2. Irreparable Harm

Threat to life and safety

Loss of liberty interests

Interference with medical care

3. Balance of Equities

No legitimate need for physical transfer in a civil case

Alternatives (video appearance) readily available

4. Public Interest

Protection of constitutional rights

Preservation of federal sentencing structure

V. IMPROPER USE OF CIVIL WRIT

This writ is improper because:

Plaintiff is the civil plaintiff, not a criminal defendant

No detainer or new charges exist

It interferes with federal custody

Such a writ:

Is not necessary

Is not narrowly tailored

Appears punitive or retaliatory

VI. SECURITY AND SAFETY CONCERNS

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The circumstances raise serious concerns:

Prior removal for safety

Ongoing litigation against same jail

Sudden writ before release

Lack of procedural compliance

These factors indicate a pattern of potential reprisal

VII. ALTERNATIVES EXIST

If Plaintiff's presence is required:

Video appearance is sufficient

Telephone appearance is sufficient

Written testimony is sufficient

If transport is absolutely required:

It should be conducted by the United States Marshals Service

Plaintiff should not be housed at White County Jail

VIII. CONCLUSION

Plaintiff respectfully submits that:

This writ is premature, improper, and dangerous

It threatens:

Plaintiff's life

His federal sentence

His constitutional rights

Failure to grant relief would:

Undermine federal statutory objectives

Allow potential retaliation

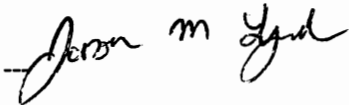
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Expose Plaintiff to irreparable harm

PRAYER FOR RELIEF

Plaintiff respectfully requests that this Court:

1. Grant leave to file this emergency motion
2. Issue an Immediate Protective Order
3. Issue an Emergency Injunction prohibiting transfer to White County Jail
4. Order BOP / Warden not to release Plaintiff pursuant to any civil writ
5. Require video or alternative appearance
6. Alternatively, allow only USMS transport with no housing at White County
7. Grant all other relief deemed just and proper



Respectfully submitted,
Jason Matthew Lynch
Pro Se Plaintiff
