

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

JASON MATTHEW LYNCH,

PLAINTIFF

v.

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

WHITE COUNTY, ARKANSAS; CLAYTON
EDWARDS; HANNAH ROSS; SERGEANT
SWINDLE; and JOHN/JANE DOES 1–10,

DEFENDANTS

**PLAINTIFF'S COURT-ORDERED MOTION FOR AN ORDER IDENTIFYING AND
SUBSTITUTING DOE DEFENDANTS, DIRECTING SERVICE, AND ACCEPTING
FILING OUT OF TIME**

Fed. R. Civ. P. 4(c)(3), 4(m), 6(b)(1)(B), and 21

1. Plaintiff Jason Matthew Lynch, proceeding pro se and in forma pauperis, submits this Motion under the procedure the Court authorized in its May 19, 2026 Order (Doc. 98): a Motion for Order identifying by name each Doe Plaintiff wishes to sue and explaining how each violated his constitutional rights.
2. This filing concerns only identification, substitution, and service of the Doe Defendants connected to the four conditions claims allowed to proceed in official capacities. It does not seek leave to file a Third Amended Complaint, add a new claim, or revive a dismissed claim. Plaintiff will address any proposed complete amended pleading by a separate motion.
3. Because the September 1, 2026 deadline in Doc. 113 expired three calendar days ago, Plaintiff also asks the Court to accept this filing out of time under Rule 6(b)(1)(B). The County did not produce its Guardian inmate log and employee-number roster until August 19, leaving thirteen days to review a 66-page report containing 2,144 chronological entries, separate fixed-tag scans from mobile entries, cross-reference employee numbers, and state individualized conduct as the Court required.

4. Plaintiff requests substitution of the twelve people listed below for the corresponding Doe placeholders, in their official capacities only: Darius Woody, Zachary Rodgers, Jeremy Jones, Mason Wilborn, Collin Tucker, Cody Balch, Brandon Robertson, Seth Phillips, Donald Wood, Joseph Martin, Matthew White, and Haley Workman.

I. CONTROLLING CLAIMS AND IDENTIFICATION PROCEDURE

5. The operative pleading is Doc. 58, docketed as the Second Amended Complaint. The Court's screening order permits only an inhumane-conditions claim against White County, Clayton Edwards, Hannah Ross, Sergeant Swindle, and the Does, in official capacities, based on: (1) sewage, feces, blood, and black mold; (2) sleeping on concrete; (3) unsafe drinking water and inadequate nutrition; and (4) inadequate exercise and yard call. Docs. 70, 75, 89.
6. On May 19, the Court allowed Plaintiff either to file a motion identifying each Doe by name and explaining the person's constitutional violation, or to move to amend. Doc. 98. On June 15, the Court expanded discovery to Doe identification. Doc. 107. On July 15, it withdrew the proposed Doe dismissal and extended identification and service to September 1, while stating no further extensions would be granted. Doc. 113.
7. Plaintiff served targeted Doe-identification discovery on July 20. On July 31, the Court required the inquiry to remain within June 9 through September 9, 2024, and required facts stating what each person did, where, and approximately when. Doc. 117. The August 19 supplemental response supplied only an Inmate Log Report and employee DSN list. Ex. 1.
8. The delay is short, the identities come from Defendants' own records, and the requested substitutions are limited to the already surviving official-capacity conditions claims. Plaintiff has acted in good faith and filed promptly after completing the necessary cross-reference. The accompanying brief addresses Rule 6(b)(1)(B).

II. WHAT THE PRODUCTION SHOWS—AND DOES NOT SHOW

9. The Guardian legend defines a single asterisk (*) as a “Cell or Out of Cell Tag Scan,” two asterisks (**) as a “Pod or Run Tag Scan,” three asterisks (***) as a wristband/ID-card scan, and “NS#” as a Mobile Command entry. Ex. 3. Plaintiff treats only a direct * PODF record as record evidence that the employee reached the F-Pod cell/out-of-cell checkpoint. Tower, pod/run, and mobile records are not represented as physical entry.
10. The first F-Pod record for Lynch is at 3:44:15 p.m. on June 10, 2024; the first direct * PODF scan is at 4:35:40 p.m. that day. The last positive F-Pod tag record is at 6:42:26 a.m. on September 4, followed at 8:14 a.m. by “Not Present—Not Assigned” and records at MED2. Exs. 3–4.
11. During the first 168 hours after the first F-Pod record, eleven named employees made direct * PODF scans. Lynch states that, through June 28, his thin sleeping mat lay on the open dayroom concrete near the only shower/toilet area. An employee making a direct F-Pod check during that period could see the mat and sleeping location. Lynch further states the shower/toilet repeatedly backed up into that area; pooled waste and odor were open and apparent when present. Lynch Decl. ¶¶ 4–7.
12. The meal records do not identify the cook, tray carrier, or replacement-meal decisionmaker. Most merely show which account entered “Accepted Meal” through Mobile Command. Plaintiff therefore does not accuse every meal-status user of serving rotten food. The nutrition identifications below rest on Plaintiff's firsthand statement that he showed the food to Wood, Swindle, and the officer he knew as Rogers. Lynch Decl. ¶ 9.
13. The County production did not identify a maintenance or water-system actor. Plaintiff does not manufacture a water Doe from a log that cannot supply that fact. The additional F-Pod

names in Appendix B are disclosed for completeness, but Plaintiff does not request substitution based solely on presence without claim-specific facts.

III. PROPOSED DOE SUBSTITUTIONS AND INDIVIDUALIZED CONDUCT

The following table identifies each requested substitute, the approximate time and place, and the surviving condition connected to that person. First-week counts cover June 10 at 3:44 p.m. through June 17 at 3:44 p.m.; full-window counts cover the log-derived F-Pod period through the last positive scan on September 4.

Requested substitute	Individual record	Conduct and identification basis	Surviving condition
1. Darius Woody DSN 1708	First week: 5 direct scans; June 12 and 17 (log pp. 3, 6–7) Full window: 31 direct scans, June 12–September 4	Each first-week entry occurred while Lynch's thin mat remained on the open dayroom concrete. Repeated later entries placed Woody in F Pod while the only shower/toilet area repeatedly backed up into that same dayroom. Lynch states those conditions were open, visible, and odorous, and no safe bed or effective sanitation remedy followed.	floor; sewage
2. Zachary Rodgers DSN 1709	First week: 1 direct scan on June 11; 2 pod/run scans through June 15 (pp. 2, 5) Full window: 49 direct scans, June 11–September 4	The roster has no “Rogers”; Rodgers is the matching F-Pod employee. Lynch knew “Sgt. Rogers” as the officer who placed him in F Pod, later showed him rotten food, and heard him participate in the August 19 yard denial. The record supports a good-faith probable identification, subject to counsel's confirmation.	floor; sewage; food; yard
3. Jeremy Jones DSN 1742	First week: 6 direct scans; June 12, 13, and 17 (pp. 2–3, 6) Full window: 66 direct scans, June 12–September 4	Only Jeremy Jones—not Misty Jones—has F-Pod records for Lynch. Lynch states that “CO Jones” received oral notice of the non-draining, mold-covered shower and saw the condition himself. His first-week direct scans also occurred while the floor mat was continuously visible. Identification should be confirmed by counsel.	floor; sewage
4. Mason Wilborn DSN 1743	First week: 5 direct scans; June 12, 14, 16, and 17 (pp. 2, 5–6) Full window: 103 direct scans, June 12–September 3	Direct scans include overnight checks at about 1:16 a.m. June 12, 11:27 p.m. June 14, 1:08 a.m. June 16, and 12:18 and 2:39 a.m. June 17. Lynch's mat was in the open dayroom throughout those nights. Wilborn later made repeated direct entries while the shower/toilet backup recurred.	floor; sewage

Requested substitute	Individual record	Conduct and identification basis	Surviving condition
5. Collin Tucker DSN 1745	First week: 1 direct scan at 5:03 a.m. June 11; 2 pod/run scans through June 15 (pp. 1, 5) Full window: 5 direct scans, June 11–29	The 5:03 a.m. direct check occurred while Lynch was required to sleep on a thin mat in the open dayroom. Tucker's later direct entries occurred during the period of recurring shower/toilet backups. No safe sleeping placement or effective protection from the contaminated area followed.	floor; sewage
6. Cody Balch DSN 1748	First week: 2 direct scans at 2:53 a.m. June 13 and 1:28 a.m. June 14 (pp. 3–4) Full window: 33 direct scans, June 13–September 1	Both first-week direct scans were overnight, when Lynch's sleeping mat was in the open dayroom. Balch continued making direct F-Pod entries during the recurring sewage/shower-backup period. Lynch states that the conditions were visible and no safe bed or effective sanitation remedy followed.	floor; sewage
7. Brandon Robertson DSN 1750	First week: 14 direct scans; June 10, 11, and 14–16 (pp. 1–2, 4–6) Full window: 48 direct scans, June 10–August 30	Robertson made the first direct F-Pod scan after placement, at 4:35 p.m. June 10, and thirteen more first-week direct scans while Lynch's floor mat remained in the open dayroom. Robertson later made repeated direct entries during the recurring sewage-backup period.	floor; sewage
8. Seth Phillips DSN 1756	First week: 18 direct scans; June 10, 11, and 14–16 (pp. 1–2, 4–6) Full window: 116 direct scans, June 10–August 30	Phillips repeatedly performed direct F-Pod checks throughout the first week while Lynch's thin mat occupied the open dayroom concrete, then continued direct checks during the recurring sewage/shower-backup period. Lynch states the conditions were visible and no safe placement or effective sanitation remedy followed.	floor; sewage
9. Donald Wood DSN 1758	First week: 6 direct scans; June 12 and 13 (pp. 2–4) Full window: 65 direct scans, June 12–September 3	Lynch orally told “CO Wood” about the shower problem and states Wood saw it. Lynch also showed Wood rotten food and was told to eat around it or eat it. Wood's account logged one declined meal on June 24 at 5:11 p.m. (p. 12); that entry corroborates a meal interaction but does not, by itself, prove spoilage or tray service.	floor; sewage; food
10. Joseph Martin DSN 1762	First week: 2 direct scans; June 11 and 13 (pp. 2–3) Full window: 26 direct scans, June 11–August 31	Martin's first-week direct checks occurred while Lynch's sleeping mat remained in the open dayroom. His later direct entries occurred during the period when the only shower/toilet repeatedly backed up into that area. Lynch states these open conditions were visible and no safe placement or effective sanitation remedy followed.	floor; sewage

Requested substitute	Individual record	Conduct and identification basis	Surviving condition
11. Matthew White DSN 1763	First week: 4 direct scans; June 10, 11, 13, and 14 (pp. 1–4, 6) Full window: 53 direct scans, June 10–September 1	White's account made the first F-Pod record at 3:44 p.m. June 10 and four first-week direct scans while Lynch's mat was on the open dayroom concrete. White continued direct entries during the recurring backup period. Matthew White is the County employee, not medical provider Jonathan White.	floor; sewage
12. Haley Workman DSN 1734	First week: No direct F-Pod tag scan produced Full window: Roster identity; date-specific firsthand allegation	On August 19, Lynch personally heard “CO Workman,” Sergeant Swindle, and “CO/Sgt. Rogers” tell F Pod that yard call was withheld because of Lynch's § 1983 case and because they were angry with him. The roster maps Workman to Haley Workman. Her identification rests on Lynch's observation, not an RFID inference.	yard/exercise

14. The eleven RFID-based names are not offered merely because they worked at the jail. Each is tied to a direct F-Pod record while Lynch's floor sleeping location was continuously in the open during the first week, and each has later direct records during the recurring sewage-backup period. Rodgers, Jones, and Wood also have additional firsthand notice facts. Workman is tied to the August 19 yard event by firsthand identification, not by a tag record.
15. The name matches are deliberately narrow. “Sgt. Rogers” is believed to be Zachary Rodgers because the produced roster contains no Rogers and Rodgers is the matching F-Pod employee. “CO Jones” is believed to be Jeremy Jones because Jeremy—not Misty Jones—has the F-Pod records. Plaintiff asks counsel to confirm those two mappings. Matthew White is the County employee and is not TK Health provider Jonathan White.
16. Sergeant Josh Swindle is already named and therefore is not requested as a Doe substitute. Plaintiff's facts also connect Swindle to sanitation notice, rotten-food replacement, and the August 19 yard denial. Hannah Ross and Clayton Edwards are already named. White County Jail/WCDC is not reasserted because it was dismissed with prejudice.

IV. SERVICE AND LIMITED CONFIRMATION

17. Plaintiff proceeds in forma pauperis. Doc. 35. Rule 4(c)(3) and 28 U.S.C. § 1915(d) therefore require court-directed service once usable identifying information is supplied. Plaintiff asks for ninety days from the substitution order for Marshal service, and asks counsel either to accept service or provide current business addresses or last-known addresses under seal directly to the Clerk or United States Marshal.
18. One direct F-Pod scan and two pod/run scans are attributed to DSN 1554, but that number is absent from the produced employee list. Plaintiff asks the Court to require Defendants, within fourteen days, to identify DSN 1554 and state whether Zachary Rodgers is the “Rogers” and Jeremy Jones is the “CO Jones” described above. Plaintiff does not ask that any private address be disclosed to him.
19. If an order dismissing the Does entered after the docket materials available to Plaintiff, he respectfully asks the Court to treat this filing as a prompt request to reconsider that interlocutory dismissal for the same Rule 6(b)(1)(B) reasons.

V. LOCAL RULE 6.2(b) CONTACT STATEMENT

20. Before filing, Plaintiff contacted Kaylen S. Lewis by email on _____, 2026, and asked whether Defendants oppose the requested out-of-time relief. Counsel: ☐ does not oppose; ☐ opposes; ☐ had not responded when this Motion was filed. Plaintiff will mark the accurate option and complete the date before filing.

REQUEST FOR RELIEF

For these reasons, Plaintiff respectfully asks the Court to:

- 1. accept this Motion three days out of time under Rule 6(b)(1)(B);
- 2. find that Plaintiff has complied with the identification procedure in Doc. 98;

- 3. substitute Darius Woody, Zachary Rodgers, Jeremy Jones, Mason Wilborn, Collin Tucker, Cody Balch, Brandon Robertson, Seth Phillips, Donald Wood, Joseph Martin, Matthew White, and Haley Workman for the corresponding Doe placeholders, in official capacities only and only as to the surviving conditions claims identified in this Motion;
- 4. direct Defendants within fourteen days to confirm the Rodgers/Rogers and Jeremy Jones/CO Jones mappings, identify DSN 1554, and provide service information under seal if needed;
- 5. extend Rule 4(m)'s service period for ninety days from the substitution order, direct the Clerk to prepare summonses, and direct the United States Marshal to serve the substituted Defendants without prepayment; and
- 6. grant any other limited relief necessary to preserve the Court-authorized Doe-identification process.

Dated: September 4, 2026

Respectfully submitted,

JASON MATTHEW LYNCH, Pro Se
261 Wilson Loop
Ward, Arkansas 72176
Telephone: 501-605-4481

CERTIFICATE OF SERVICE

I certify that on _____, 2026, I served a true and correct copy of the foregoing Motion, Brief, Declaration, proposed Order, appendices, and exhibits by email on Kaylen S. Lewis, counsel for the County Defendants, at lewis@jowenslawfirm.com.

JASON MATTHEW LYNCH

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WHITE COUNTY, ARKANSAS; CLAYTON
EDWARDS; HANNAH ROSS; SERGEANT
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DEFENDANTS

**BRIEF IN SUPPORT OF PLAINTIFF'S COURT-ORDERED DOE-IDENTIFICATION
MOTION**

INTRODUCTION

The Court gave Plaintiff a specific route to identify the Does by motion. Doc. 98. This filing follows that route, supplies names from the County's own August 19 production, ties the requested substitutes to dates, places, and surviving conditions, and asks for IFP service. Because the September 1 deadline passed three days ago, Plaintiff also addresses Rule 6(b)(1)(B) candidly. The short delay followed a late, data-heavy production and caused no meaningful prejudice.

ARGUMENT

**I. GOOD CAUSE AND EXCUSABLE NEGLECT SUPPORT ACCEPTING THE FILING
THREE DAYS LATE.**

Rule 6(b)(1)(B) permits a post-deadline extension for good cause when the failure to act resulted from excusable neglect. The determination is equitable and considers prejudice, length of delay and effect on proceedings, reason for delay, and good faith. *Chorosevic v. MetLife Choices*, 600 F.3d 934, 946–47 (8th Cir. 2010). The reason is important, but all circumstances are considered. *Kurka v. Iowa County*, 628 F.3d 953, 959–60 (8th Cir. 2010).

Prejudice. The names and DSNs come from Defendants' own records. The requested claims and official-capacity limitation are already in the case. A three-day delay does not impair evidence, surprise the County, or materially alter the defense.

Length and impact. Three calendar days is brief. The case remains in the exhaustion/discovery stage, and the Court can avoid any schedule impact by setting service from the substitution order.

Reason and diligence. Plaintiff sought identification discovery, served a focused packet, and earlier sought additional time. The County's August 19 response arrived thirteen days before the deadline and supplied a 66-page log with 2,144 entries plus a separate employee list. The Court had required Plaintiff to say what each person did, where, and approximately when. Separating direct * scans from tower, pod/run, wristband, and mobile records; matching DSNs; and checking firsthand allegations required line-by-line review. Plaintiff acknowledges the Court's no-further-extension warning and does not minimize the deadline; he asks for acceptance of a completed filing rather than another open-ended extension.

Good faith. Plaintiff identifies the weaknesses in his own evidence. He does not call tower records physical entry, does not call meal-status entries proof of rotten food, does not name every person in the log, and does not use this Motion to expand the case. That restraint and prompt correction support good faith.

On balance, the County's late production, the analysis the Court required, the very short delay, lack of prejudice, and good faith establish good cause and excusable neglect. If the September 1 date is treated as a case-management deadline, the same diligence also supplies good cause under Rule 16(b)(4).

II. THE MOTION PROVIDES THE NAME-AND-CONDUCT SHOWING REQUIRED BY DOC. 98.

Unknown defendants should not be dismissed before a plaintiff has a fair opportunity to discover their identities when the allegations are sufficiently specific. *Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985). Here, discovery has now supplied names and unique employee numbers. The Motion does more than list staff: it identifies the direct F-Pod records during the continuous floor-sleeping period; distinguishes later scans and tower-only records; and adds firsthand notice facts for sanitation, nutrition, and yard call. That satisfies the procedure the Court itself established in Doc. 98.

Substitution is also permissible on just terms under Rule 21. The request is limited to existing Doe placeholders and surviving official-capacity claims. It does not depend on relation back: Arkansas's three-year personal-injury period ordinarily applies to § 1983 claims, *Birmingham v. Omaha School District*, 220 F.3d 850, 854 (8th Cir. 2000), and the 2024 events remain within three years. Prompt substitution now avoids future limitations disputes.

III. IFP STATUS REQUIRES COURT-DIRECTED SERVICE AND SUPPORTS A RULE 4(m) EXTENSION.

When a plaintiff is authorized to proceed in forma pauperis, Rule 4(c)(3) requires the Court to order service by the United States Marshal or another appointed person, and 28 U.S.C. § 1915(d) directs court officers to issue and serve process. Once an IFP plaintiff supplies usable identifying and address information, court staff and the Marshal must carry out service. *Wright v. First Student, Inc.*, 710 F.3d 782, 783–84 (8th Cir. 2013).

Rule 4(m) requires an extension for good cause and permits a discretionary extension even without good cause. *Kurka*, 628 F.3d at 957. Plaintiff could not serve unnamed employees before

the County supplied the identity records. Ninety days from the substitution order, with last-known addresses filed under seal where necessary, is a focused and workable remedy.

CONCLUSION

The Court should accept the short late filing, substitute the twelve identified persons in official capacities as specified, obtain the limited identity confirmations, and direct IFP service.

Dated: September 4, 2026

Respectfully submitted,

JASON MATTHEW LYNCH, Pro Se
261 Wilson Loop
Ward, Arkansas 72176
Telephone: 501-605-4481

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DEFENDANTS

DECLARATION OF JASON MATTHEW LYNCH

I, Jason Matthew Lynch, declare as follows:

1. I am the Plaintiff. I make this declaration from personal knowledge, except that the names and employee-number mappings learned in discovery are based on the County's records. I must review every paragraph and sign only if it is true.
2. I was confined at the White County Detention Center between June 9 and September 9, 2024. An officer I knew as Sergeant Rogers placed me in F Pod on June 10. The County log's first F-Pod record is June 10 at 3:44 p.m.
3. F Pod was overcrowded. From June 10 through approximately June 28, I had no bunk and slept on a thin mat directly on the concrete in the open dayroom, near the only shower and toilet area. My mat and sleeping place were not concealed inside a cell.
4. Based on what I observed while housed there, an officer making a direct cell/out-of-cell F-Pod checkpoint scan was inside or immediately at the secured F-Pod living area. An officer conducting a direct check while my mat was there could see where I was required to sleep.
5. The only shower did not drain correctly and the shower/toilet area repeatedly backed up. Water and sewage entered the dayroom where inmates lived, ate, and slept. When a backup

was occurring, the pooling and odor were open and apparent to anyone who entered the living area.

6. I made repeated oral and written complaints. I specifically told CO Wood, CO Jones, Sergeant Swindle, and Lieutenant Ross about the shower problem. I also saw them view the condition. The problem was not effectively corrected while I remained there.
7. The names in this Motion that are tied to the first-week direct scans were unknown to me by full legal name until discovery. The County's employee list and Guardian log now identify the DSNs. The dates and scan counts in the Motion accurately summarize the produced log to the best of my knowledge after review.
8. I was served visibly rotten food approximately eight times. I personally showed the food to CO Wood, Sergeant Swindle, and the officer I knew as Sergeant Rogers. I was told to eat around it or eat it. On one occasion Sergeant Swindle removed the tray but no replacement meal was brought, and I went hungry. I do not claim that a mobile "Accepted Meal" entry alone proves who cooked or carried a tray.
9. On August 19, 2024, F Pod was denied yard call. I personally heard CO Workman, Sergeant Swindle, and the officer I knew as Rogers tell the pod that the denial was because of my § 1983 case and because they were angry with me. The produced employee list identifies Haley Workman and Zachary Rodgers; those are my good-faith identifications, subject to confirmation.
10. The County's roster contains Jeremy Jones and Misty Jones, but only Jeremy Jones appears in Lynch's F-Pod Guardian records. For that reason, I believe Jeremy Jones is the CO Jones I described. The roster contains Zachary Rodgers but no Rogers, and Rodgers appears repeatedly in F Pod. For that reason, I believe Zachary Rodgers is the officer I knew as Rogers.

11. I received the County's supplemental response, employee list, and Guardian log on or about August 19, 2026. I then had thirteen days before the September 1 deadline to review 66 pages and 2,144 entries, distinguish record types, match employee numbers, and prepare person-specific information. I did not complete the filing by September 1. I completed it and sought to file it on September 4, three days late. The delay was not intended to gain an advantage or disregard the Court.
12. I understand that the Court limited the surviving Doe claims to official capacities. This Motion follows that limitation and does not ask to add a new claim or substitute every employee whose name appeared in the log.

I declare under penalty of perjury that the foregoing is true and correct. See 28 U.S.C. § 1746.

Executed on September ____, 2026, at _____.

JASON MATTHEW LYNCH

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WHITE COUNTY, ARKANSAS; CLAYTON
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DEFENDANTS

[PROPOSED] ORDER

Before the Court is Plaintiff's Court-Ordered Motion for an Order Identifying and Substituting Doe Defendants, Directing Service, and Accepting Filing Out of Time. For good cause shown, the Motion is GRANTED as follows:

1. The September 4, 2026 filing is accepted under Federal Rule of Civil Procedure 6(b)(1)(B).
2. The Clerk shall substitute the following persons for the corresponding Doe placeholders, in their official capacities only and only as to the surviving conditions-of-confinement claims:

Darius Woody, Zachary Rodgers, Jeremy Jones, Mason Wilborn, Collin Tucker, Cody Balch, Brandon Robertson, Seth Phillips, Donald Wood, Joseph Martin, Matthew White, and Haley Workman.
3. Within fourteen days, the County Defendants shall state whether Zachary Rodgers is the officer Plaintiff knew as "Rodgers," whether Jeremy Jones is the officer Plaintiff knew as "CO Jones," and the full name associated with DSN 1554. If any substituted person is no longer employed at WCDC or cannot be served at a current business address, counsel shall file that person's last-known address under seal for use only by the Clerk and United States Marshal.

4. The Clerk shall prepare summonses. Pursuant to Rule 4(c)(3) and 28 U.S.C. § 1915(d), the United States Marshal shall serve the substituted Defendants without prepayment of fees. The Rule 4(m) service period is extended to ninety days from entry of this Order.
5. This Order does not grant leave to file a Third Amended Complaint and does not revive any dismissed claim or personal-capacity claim.

IT IS SO ORDERED this _____ day of _____, 2026.

UNITED STATES MAGISTRATE JUDGE

APPENDIX A

DOE IDENTITY AND SURVIVING-CLAIM MATRIX

This chart is a compact index to the individualized showing in the Motion. It is not a new complaint and does not expand the screening order.

Name	DSN	Surviving condition(s)	Time/location basis	Identification note
Darius Woody	1708	floor; sewage	5 direct scans; June 12 and 17 (log pp. 3, 6–7)	Direct first-week checkpoint evidence
Zachary Rodgers	1709	floor; sewage; food; yard	1 direct scan on June 11; 2 pod/run scans through June 15 (pp. 2, 5)	Probable Rogers mapping; confirm
Jeremy Jones	1742	floor; sewage	6 direct scans; June 12, 13, and 17 (pp. 2–3, 6)	Probable CO Jones mapping; confirm
Mason Wilborn	1743	floor; sewage	5 direct scans; June 12, 14, 16, and 17 (pp. 2, 5–6)	Direct first-week checkpoint evidence
Collin Tucker	1745	floor; sewage	1 direct scan at 5:03 a.m. June 11; 2 pod/run scans through June 15 (pp. 1, 5)	Direct first-week checkpoint evidence
Cody Balch	1748	floor; sewage	2 direct scans at 2:53 a.m. June 13 and 1:28 a.m. June 14 (pp. 3–4)	Direct first-week checkpoint evidence
Brandon Robertson	1750	floor; sewage	14 direct scans; June 10, 11, and 14–16 (pp. 1–2, 4–6)	Direct first-week checkpoint evidence
Seth Phillips	1756	floor; sewage	18 direct scans; June 10, 11, and 14–16 (pp. 1–2, 4–6)	Direct first-week checkpoint evidence
Donald Wood	1758	floor; sewage; food	6 direct scans; June 12 and 13 (pp. 2–4)	Direct oral notice and food display
Joseph Martin	1762	floor; sewage	2 direct scans; June 11 and 13 (pp. 2–3)	Direct first-week checkpoint evidence
Matthew White	1763	floor; sewage	4 direct scans; June 10, 11, 13, and 14 (pp. 1–4, 6)	Direct first-week checkpoint evidence
Haley Workman	1734	yard/exercise	Firsthand August 19 yard-call statement; roster DSN 1734	Direct firsthand identification

Already named: White County, Clayton Edwards, Hannah Ross, and Sergeant Josh Swindle (DSN 1753). Dismissed with prejudice and not reasserted: White County Jail/White County Detention Center.

No additional water-system or maintenance Doe can be responsibly identified from the August 19 production. No meal-status entry alone is treated as proof that the employee cooked, carried, or knowingly refused to replace rotten food.

APPENDIX B

COMPLETE F-POD RFID AND MEAL-STATUS AUDIT

Source: County's Inmate Log Archive and 2024 Detention Employees list, produced August 19, 2026. F-Pod record window: June 10, 2024 at 3:44 p.m. through September 4, 2024 at 6:42 a.m. The report contains 1,517 fixed-tag records during this window. Counts below are record attributions, not automatic findings of liability.

A. Employees with at least one direct * PODF scan

DSN	Roster name	Direct *	First	Last	Status in this Motion
1554	Unidentified in produced roster	1	June 20	July 24	Identity still required
1613	Dakota Phillips	3	July 17	July 17	Later direct scans
1693	Matthew Rainwater	5	July 9	July 14	Later direct scans
1708	Darius Woody	31	June 12	September 4	Requested substitute
1709	Zachary Rodgers	49	June 11	September 4	Requested substitute
1711	Cody Siler	13	June 26	September 1	June 12 record is pod/run only; direct scans begin June 26
1720	Dakota Greer	7	July 19	August 29	Later direct scans
1722	Anthony Becker	14	August 20	September 3	Later direct scans
1727	Gayelyn Hargrove	8	June 24	September 4	Later direct scans
1740	Canton Dunn	1	June 21	June 21	Later direct scan
1742	Jeremy Jones	66	June 12	September 4	Requested substitute
1743	Mason Wilborn	103	June 12	September 3	Requested substitute
1745	Collin Tucker	5	June 11	June 29	Requested substitute
1748	Cody Balch	33	June 13	September 1	Requested substitute
1750	Brandon Robertson	48	June 10	August 30	Requested substitute
1753	Josh Swindle	22	June 21	September 3	Already named
1756	Seth Phillips	116	June 10	August 30	Requested substitute
1758	Donald Wood	65	June 12	September 3	Requested substitute
1761	Rylin Gambetta	3	June 21	September 2	Later direct scans
1762	Joseph Martin	26	June 11	August 31	Requested substitute
1763	Matthew White	53	June 10	September 1	Requested substitute
1765	Conner Goodwin	27	June 20	September 2	Later direct scans
1766	Jackson Woody	15	July 9	September 3	Later direct scans

B. Employees with pod/run or tower records but no direct * PODF scan

DSN	Roster name	Pod/run **	Dates	Limit
1079	Chelsi Monsivais-Gerardo	2	June 17	Not evidence of physical entry

DSN	Roster name	Pod/run **	Dates	Limit
1713	Ami Lee	71	June 12–July 3	Not evidence of physical entry
1730	Stevie Hughes	106	July 17–August 7	Not evidence of physical entry
1738	Amber Rodgers	12	July 4–9	Not evidence of physical entry
1747	Savannah Chisum	7	July 8–September 3	Not evidence of physical entry
1754	Amanda Adams	1	June 29	Not evidence of physical entry
1755	Nicole Stipes	3	July 27–August 20	Not evidence of physical entry
1759	Ralph Iweriebor	7	June 11–18	Not evidence of physical entry

C. Every account associated with an F-Pod meal-status record

There are 250 meal-status events: 247 accepted, two offered, and one declined. Most are NS# Mobile Command population entries. They identify the account entering a status, not necessarily the cook, tray carrier, or decisionmaker.

DSN	Roster name	Status events	Evidentiary use
1554	Unidentified	2	Status recorder only unless supported by firsthand facts
1613	Dakota Phillips	3	Status recorder only unless supported by firsthand facts
1693	Matthew Rainwater	1	Status recorder only unless supported by firsthand facts
1708	Darius Woody	4	Status recorder only unless supported by firsthand facts
1709	Zachary Rodgers	19	Status recorder only unless supported by firsthand facts
1720	Dakota Greer	2	Status recorder only unless supported by firsthand facts
1722	Anthony Becker	3	Status recorder only unless supported by firsthand facts
1727	Gayelyn Hargrove	1	Status recorder only unless supported by firsthand facts
1742	Jeremy Jones	17	Status recorder only unless supported by firsthand facts
1743	Mason Wilborn	34	Status recorder only unless supported by firsthand facts
1748	Cody Balch	14	Status recorder only unless supported by firsthand facts
1750	Brandon Robertson	6	Status recorder only unless supported by firsthand facts
1753	Josh Swindle	6	Status recorder only unless supported by firsthand facts
1756	Seth Phillips	38	Status recorder only unless supported by firsthand facts

DSN	Roster name	Status events	Evidentiary use
1758	Donald Wood	52	Status recorder only unless supported by firsthand facts
1762	Joseph Martin	10	Status recorder only unless supported by firsthand facts
1763	Matthew White	11	Status recorder only unless supported by firsthand facts
1765	Conner Goodwin	10	Status recorder only unless supported by firsthand facts
1766	Jackson Woody	17	Status recorder only unless supported by firsthand facts

D. Record-use limits

- A direct * scan supports presence at the F-Pod cell/out-of-cell checkpoint. It does not, by itself, prove exactly what the employee saw, subjective knowledge, authority to repair, or deliberate disregard.
- A ** tower/pod/run record or NS# Mobile Command entry does not prove the employee physically entered the living area.
- The employee spreadsheet maps DSNs to names for 2024. It is a labor-distribution list, not a shift, rank, post, or unit-assignment roster.
- DSN 1554 remains unmapped. Donald Wood, Darius Woody, and Jackson Woody are distinct. Zachary Rodgers and Amber Rodgers are distinct. Matthew White is not Jonathan White.
- The requested substitutions use the log together with Lynch's declaration. Later direct scanners and tower-only users are disclosed so the Court can see the complete audit, but are not requested as substitutes solely from electronic presence.

EXHIBIT INDEX

Designation	Document	Purpose
Exhibit 1	County Defendants' Supplemental Responses dated August 19, 2026	Shows the date and limited scope of the production.
Exhibit 2	Selected employee DSN roster excerpt	Maps the DSNs used in the Motion to full names; states no rank or assignment.
Exhibit 3	Guardian Inmate Log, pages 1–7	Shows the first F-Pod record and the exact first-week direct and pod/run scans.
Exhibit 4	Guardian Inmate Log, pages 12, 48, and 62–63	Shows Wood's June 24 declined-meal status, August 19 F-Pod activity, and the last positive F-Pod/first not-assigned records.
Exhibit 5	Prior factual statement, Doc. 22, pages 39, 40, 42, and 45	Corroborates floor sleeping, sanitation notice, rotten-food notice, and the August 19 yard-call event. The present declaration restates only facts Lynch must verify before signing.

The appended exhibits are selected, claim-linked pages. The complete 66-page Guardian report and native employee workbook remain available if the Court requests them.

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

JASON MATTHEW LYNCH,

PLAINTIFF

v.

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

WHITE COUNTY, ARKANSAS, et al.,

DEFENDANTS

EXHIBIT 1

**County Defendants' Supplemental Responses dated August 19,
2026**

Purpose: Shows when the County produced the Inmate Log Report and employee DSN list and the limited scope of that response.

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

JASON MATTHEW LYNCH

PLAINTIFF

vs.

NO. 4:26-cv-00118-JM-JJV

CLAYTON EDWARDS;
LT. HANNAH ROSS;
SGT. SWINDLE; and
WHITE COUNTY, ARKANSAS

DEFENDANTS

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

and

JASON LYNCH

PLAINTIFF

vs.

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

CLAYTON EDWARDS;
LT. HANNAH ROSS; CONNER GOODWIN;
ZACHARY RODGERS;
SGT. SWINDLE; DONALD WOOD;
and CODY SILER

DEFENDANTS

**DEFENDANTS' SUPPLEMENTAL RESPONSES TO PLAINTIFF'S
LIMITED AND TARGETED DISCOVERY**

REQUEST FOR PRODUCTION NO. 1: Duty rosters / shift schedules identifying staff working at the White County Detention Center during Plaintiff's confinement (June 9, 2024 – September 9, 2024).

RESPONSE: Please find attached Inmate Log Report and Detention Employees' DSN Numbers.

Respectfully submitted,

CLAYTON EDWARDS; LT. HANNAH ROSS;
SGT. SWINDLE; in their official capacity and
WHITE COUNTY, ARKANSAS, *Defendants*



Kaylen S. Lewis

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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2026, I emailed the foregoing document to the following:

Jason Lynch
261 Wilson Loop
Ward, AR 72176



Kaylen S. Lewis

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

JASON MATTHEW LYNCH,

PLAINTIFF

v.

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

WHITE COUNTY, ARKANSAS, et al.,

DEFENDANTS

EXHIBIT 2

Selected employee DSN roster excerpt

Purpose: Maps the DSNs used in the Motion to full names and makes clear that the source does not state rank, shift, post, or assignment.

EXHIBIT 2 — SELECTED EMPLOYEE DSN ROSTER EXCERPT

Source: *Detention Employees 1-1-24 to 12-31-24.xlsx*, produced by the County on August 19, 2026. The workbook is a one-column 2024 Labor Distribution list. These entries reproduce its DSN/name text in readable form; the source does not state rank, shift, post, or F-Pod assignment. DSN 1554 is included to show that it appears in the Guardian log but is absent from the roster.

DSN	Employee name as listed	Use in audit
1079	Monsivais-Gerardo, Chelsi	Additional F-Pod record user
1554	Not present in produced roster	Unresolved account
1613	Phillips, Dakota	Additional F-Pod record user
1693	Rainwater, Matthew	Additional F-Pod record user
1708	Woody, Darius	Requested Doe substitute
1709	Rodgers, Zachary	Requested Doe substitute
1711	Siler, Cody	Additional F-Pod record user
1713	Lee, Ami	Additional F-Pod record user
1720	Greer, Dakota	Additional F-Pod record user
1722	Becker, Anthony	Additional F-Pod record user
1727	Hargrove, Gayelyn	Additional F-Pod record user
1730	Hughes, Stevie	Additional F-Pod record user
1734	Workman, Haley	Requested Doe substitute
1738	Rodgers, Amber	Additional F-Pod record user
1740	Dunn, Canton	Additional F-Pod record user
1742	Jones, Jeremy	Requested Doe substitute
1743	Wilborn, Mason	Requested Doe substitute
1745	Tucker, Collin	Requested Doe substitute
1747	Chisum, Savannah	Additional F-Pod record user
1748	Balch, Cody	Requested Doe substitute
1750	Robertson, Brandon	Requested Doe substitute
1753	Swindle, Josh	Already named
1754	Adams, Amanda	Additional F-Pod record user
1755	Stipes, Nicole	Additional F-Pod record user
1756	Phillips, Seth	Requested Doe substitute
1758	Wood, Donald	Requested Doe substitute
1759	Iweriebor, Ralph	Additional F-Pod record user
1761	Gambetta, Rylin	Additional F-Pod record user
1762	Martin, Joseph	Requested Doe substitute
1763	White, Matthew	Requested Doe substitute

DSN	Employee name as listed	Use in audit
1765	Goodwin, Conner	Additional F-Pod record user
1766	Woody, Jackson	Additional F-Pod record user

Name cautions: Donald Wood, Darius Woody, and Jackson Woody are different people; Zachary Rodgers and Amber Rodgers are different people; Matthew White is the County employee and not TK Health provider Jonathan White.

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

JASON MATTHEW LYNCH,

PLAINTIFF

v.

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

WHITE COUNTY, ARKANSAS, et al.,

DEFENDANTS

EXHIBIT 3

Guardian Inmate Log, pages 1–7

Purpose: Shows the first F-Pod record and the direct and pod/run records in the first 168 hours.

Inmate Log Report

White County Jail

Dates: 4/9/2024 00:00 - 9/9/2024 23:59:59

Booking Num	Inmate	Days				
24-B01797	Lynch, Jason	92 Day(s)				
		Date	Checks			
		06/10/2024	24 Check(s)			
			Time	Action	Location	Officer
			01:35:29	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1718
			06:13:00	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1709
			06:13:52	* Headcount Present	INT3	1709
			06:38:01	* Headcount Present	INT3	1754
			06:38:12	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			06:54:45	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1709
			07:29:53	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			07:30:00	* Accepted Meal	INT3	1754
			07:55:35	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			07:55:51	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			09:35:07	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			10:30:53	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			10:31:07	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			11:17:26	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1709
			11:24:59	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1747
			11:25:02	* Accepted Meal	INT3	1747
			11:40:12	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1754
			13:21:02	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1709
			15:39:56	* Well-Being Check Inmate and Cell OK (INT3)	INT3	1750
			15:44:15	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			16:35:40	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			16:46:56	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			16:58:08	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			18:48:26	NS# Headcount Present	PODF	1745
		Date	Checks			
		06/11/2024	29 Check(s)			
			Time	Action	Location	Officer
			05:03:54	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1745
			05:20:20	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1745

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			06:15:45	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			06:23:17	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			07:43:23	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			07:56:56	NS# Accepted Meal	PODF	1756
			08:02:27	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			08:52:33	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			08:54:05	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1756
			09:55:48	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			10:08:37	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1763
			10:08:40	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1762
			11:13:44	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1709
			11:18:03	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1709
			11:47:17	NS# Accepted Meal	PODF	1756
			12:05:13	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			12:08:55	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			12:57:26	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			13:03:09	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1756
			13:27:16	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			14:19:13	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			14:30:36	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			14:57:58	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1761
			16:05:45	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1763
			16:09:29	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			16:44:29	NS# Accepted Meal	PODF	1756
			17:13:10	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			17:16:46	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			18:24:36	NS# Headcount Present	PODF	1745
		Date	Checks			
		06/12/2024	30 Check(s)			
			Time	Action	Location	Officer
			01:16:13	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			06:10:07	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			06:28:25	* Headcount Present	PODF	1758
			08:00:58	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			08:05:03	NS# Accepted Meal	PODF	1758
			08:32:52	NS# To Offender Whites/Personals to Guard, Uniform/Jump-Suite	PODF	1742
			08:46:33	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			08:52:17	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1711

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			09:05:15	NS# Accepted Recreation (Recreation)	PODF	1742
			09:14:11	NS# From Recreation	PODF	1742
			09:24:35	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			09:34:35	NS# To Offender Cleaning Supplies	PODF	1742
			09:44:33	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			10:35:43	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			10:36:15	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			11:24:17	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			11:37:32	NS# Accepted Meal	PODF	1758
			12:07:07	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			12:40:38	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			12:52:07	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			13:30:25	NS# To Offender Whites/Personals to Offender	PODF	1742
			14:00:47	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			14:06:04	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			14:44:52	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			14:51:03	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			16:00:30	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			16:29:14	NS# Accepted Meal	PODF	1742
			17:30:28	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			19:14:05	NS# Headcount Present	PODF	1748
			19:17:25	NS# To Offender Nicotine Pouches	PODF	1748
		Date	Checks			
		06/13/2024	21 Check(s)			
			Time	Action	Location	Officer
			02:53:02	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1748
			02:59:17	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1748
			06:14:39	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			06:33:46	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			08:05:04	NS# Accepted Meal	PODF	1758
			08:09:03	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			08:36:23	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			08:58:49	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			09:14:32	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1763
			09:42:55	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			10:49:42	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1762
			11:49:30	NS# Accepted Meal	PODF	1763
			11:52:38	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			12:31:24	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			12:51:50	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			13:46:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			14:32:12	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			15:42:16	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			16:33:18	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			17:20:25	NS# Accepted Meal	PODF	1758
			19:01:51	NS# Headcount Present	PODF	1748
		Date	Checks			
		06/14/2024	30 Check(s)			
			Time	Action	Location	Officer
			01:28:48	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1748
			01:49:42	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1748
			06:44:58	NS# Headcount Present	PODF	1756
			06:47:56	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			06:57:09	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1756
			07:57:55	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			08:10:56	NS# Accepted Meal	PODF	1756
			08:44:24	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			08:44:58	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			09:26:01	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			09:34:28	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			10:23:47	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			11:04:13	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			11:14:05	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			11:49:30	NS# Accepted Meal	PODF	1756
			11:53:54	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			12:31:15	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			12:46:07	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			12:59:09	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			13:13:47	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1762
			13:45:59	NS# To Offender As Needs	PODF	1750
			13:51:07	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			14:36:32	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1763
			15:10:07	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			15:40:02	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			16:31:11	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			16:34:17	NS# Accepted Meal	PODF	1756
			17:01:46	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			18:19:33	NS# Headcount Present	PODF	1745
			23:27:34	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
		Date	Checks			
		06/15/2024	24 Check(s)			
			Time	Action	Location	Officer
			00:21:34	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1745
			06:14:27	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			06:20:49	NS# Headcount Present	PODF	1756
			06:24:11	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			07:40:18	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			07:47:52	NS# Accepted Meal	PODF	1756
			08:13:40	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			08:53:53	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			09:19:48	NS# To Offender Uniform/Jump-Suite	PODF	1756
			09:20:29	NS# To Offender Uniform/Jump-Suite	PODF	1756
			09:25:22	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1756
			11:35:19	NS# To Offender Cleaning Supplies	PODF	1754
			11:54:14	NS# Accepted Meal	PODF	1756
			12:28:03	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			13:14:28	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			13:18:09	NS# To MED On-Site	PODF	1754
			13:19:34	** Well-Being Check Inmate and Cell OK (TOWER POD F) - Not Present - MED On-Site	TOWER POD F	1750
			13:44:30	NS# From MED On-Site	PODF	1754
			14:43:27	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			16:45:19	NS# Accepted Meal	PODF	1750
			16:58:46	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1709
			17:37:19	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			17:45:59	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			18:57:28	NS# Headcount Present	PODF	1745
		Date	Checks			
		06/16/2024	19 Check(s)			
			Time	Action	Location	Officer
			00:52:41	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1743
			01:08:28	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			06:42:48	NS# Headcount Present	PODF	1756
			06:45:30	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			06:52:59	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1756
			07:53:25	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			08:11:22	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			10:42:47	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			11:58:01	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1756
			12:09:27	NS# Accepted Meal	PODF	1750
			12:16:02	NS# Accepted Meal	PODF	1750
			12:20:52	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			13:52:42	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			14:00:51	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1750
			15:34:11	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			16:26:28	NS# Accepted Meal	PODF	1750
			17:10:13	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1750
			18:20:23	NS# Headcount Present	PODF	1745
			23:58:11	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1743
		Date	Checks			
		06/17/2024	26 Check(s)			
			Time	Action	Location	Officer
			00:18:37	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			02:30:05	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1743
			02:39:07	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			06:07:58	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			06:34:38	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			07:45:17	NS# Accepted Meal	PODF	1742
			08:45:38	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			08:51:42	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1761
			09:25:11	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1079
			09:31:46	NS# Declined Recreation (Recreation)	PODF	1742
			10:12:25	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			10:27:15	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			10:48:44	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1708
			11:35:50	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			11:49:06	NS# Accepted Meal	PODF	1742
			12:28:10	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			13:11:09	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			13:23:22	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			13:58:39	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			14:50:57	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1079
			14:53:42	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			15:45:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			16:27:11	NS# Accepted Meal	PODF	1708
			17:27:03	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			17:37:34	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			19:06:06	NS# Headcount Present	PODF	1755
		Date	Checks			
		06/18/2024	25 Check(s)			
			Time	Action	Location	Officer
			00:26:52	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1748
			00:38:27	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1748
			06:08:03	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			06:42:59	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			08:05:56	NS# Accepted Meal	PODF	1708
			08:33:50	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			08:55:56	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1759
			09:25:37	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			09:49:38	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			10:43:31	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			11:17:08	NS# Accepted Meal	PODF	1708
			11:42:52	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			12:13:09	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			12:35:30	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			13:23:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			13:35:07	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			14:24:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			14:37:48	NS# To Offender BLEACH	PODF	1742
			14:57:55	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			15:17:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			16:22:03	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			16:35:36	NS# Accepted Meal	PODF	1742
			17:06:31	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			18:54:27	NS# Headcount Present	PODF	1753
			18:56:50	NS# To Offender Nicotine Pouches	PODF	1753

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

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

JASON MATTHEW LYNCH,

PLAINTIFF

v.

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

WHITE COUNTY, ARKANSAS, et al.,

DEFENDANTS

EXHIBIT 4

Guardian Inmate Log, pages 12, 48, and 62–63

Purpose: Shows the June 24 declined-meal status, August 19 F-Pod activity, and the last positive F-Pod and first not-assigned records.

			11:28:18	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			11:29:21	NS# Accepted Meal	PODF	1758
			12:15:53	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			12:20:14	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			13:00:04	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1761
			13:12:13	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1765
			13:40:29	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1727
			14:36:53	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1727
			14:43:32	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1756
			15:26:10	NS# Offered Recreation (Recreation)	PODF	1756
			15:36:46	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			16:09:23	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1727
			17:11:44	NS# Declined Meal	PODF	1758
		Date	Checks			
		06/25/2024	4 Check(s)			
			Time	Action	Location	Officer
			15:56:19	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1709
			16:19:38	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1727
			17:25:42	*** Accepted Meal	PODF	1765
			19:09:38	NS# Lynch, Jason - Wristband Headcount - PODF - Wristband Not Scanned	PODF	1745
		Date	Checks			
		06/26/2024	33 Check(s)			
			Time	Action	Location	Officer
			00:40:33	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1743
			01:09:41	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			06:13:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			06:33:24	* Accepted Recreation (Recreation)	PODF	1758
			06:36:43	NS# From Recreation	PODF	1758
			06:36:55	NS# Headcount Present	PODF	1758
			07:37:23	NS# Accepted Meal	PODF	1758
			08:02:31	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			08:23:03	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			09:04:49	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1711
			09:05:16	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713
			09:37:42	NS# To Offender Uniform/Jump-Suite, Whites/Personals to Guard	PODF	1742
			09:50:45	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1713

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			18:30:28	* Lynch, Jason - Wristband Headcount - PODF - Wristband Not Scanned	PODF	1742
			19:56:52	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1742
			20:22:23	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			23:30:05	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
		Date	Checks			
		08/19/2024	31 Check(s)			
			Time	Action	Location	Officer
			01:38:13	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			01:38:24	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			04:10:09	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1708
			04:11:53	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1761
			05:09:09	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1763
			05:29:30	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1763
			06:41:51	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1720
			06:42:30	NS# Headcount Present	PODF	1720
			06:53:43	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1720
			07:56:10	NS# Accepted Meal	PODF	1743
			07:57:48	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1720
			08:25:54	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			08:30:18	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			09:34:53	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			10:13:33	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			10:37:18	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			11:39:20	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			11:48:05	NS# Accepted Meal	PODF	1743
			12:18:49	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			13:06:12	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			13:06:56	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			14:04:28	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			14:15:14	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			15:30:10	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			15:37:49	NS# To Recreation	PODF	1743
			15:59:34	NS# From Recreation	PODF	1743
			16:14:04	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758
			17:05:57	NS# Accepted Meal	PODF	1743
			17:14:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1758

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			02:13:57	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1722
			02:16:14	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1747
			03:12:52	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1727
			03:17:49	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1727
			05:16:16	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1722
			05:19:55	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1722
			06:26:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1753
			07:16:06	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			08:23:46	NS# Accepted Meal	PODF	1758
			08:25:27	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1753
			09:01:50	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1758
			09:32:52	NS# To Offender Cleaning Supplies	PODF	1758
			10:40:35	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1753
			10:47:46	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			12:42:42	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			12:53:33	NS# (returned mail)	PODF	1766
			13:35:21	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1743
			14:23:41	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			14:31:55	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1766
			15:48:27	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			16:49:36	NS# Accepted Meal	PODF	1743
			17:26:57	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1743
			18:20:10	NS# Lynch, Jason - Wristband Headcount - PODF - Wristband Not Scanned	PODF	1722
			18:22:37	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1722
			19:15:19	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1722
			19:41:26	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1722
			20:22:04	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1722
		Date	Checks			
		09/04/2024	24 Check(s)			
			Time	Action	Location	Officer
			00:05:43	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1708
			00:18:36	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1708
			02:22:13	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1742
			02:28:51	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1727
			06:19:56	** Well-Being Check Inmate and Cell OK (TOWER POD F)	TOWER POD F	1709
			06:42:26	* Well-Being Check Inmate and Cell OK (PODF)	PODF	1709
			06:42:28	NS# Lynch, Jason - Wristband Headcount - PODF - Not Present - Minister Visit	PODF	1765

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

			08:14:09	* Well-Being Check Inmate and Cell OK (PODF) - Not Present - Not Assigned	PODF	1709
			09:24:17	* Well-Being Check Inmate and Cell OK (MED2) - Not Present - Not Assigned	MED2	1734
			11:30:47	NS# From Not Assigned	MED2	1734
			11:53:16	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			11:53:18	* Accepted Meal	MED2	1734
			14:26:19	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			15:42:37	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			18:01:40	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1711
			18:03:21	NS# Headcount Present	MED2	1711
			19:01:14	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			19:10:16	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			19:48:56	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			20:21:32	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			21:08:15	NS# To MED Bench (visit)	MED2	1761
			22:05:31	NS# From MED Bench	MED2	1761
			22:05:36	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			22:52:52	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
		Date	Checks			
		09/05/2024	19 Check(s)			
			Time	Action	Location	Officer
			01:05:59	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			04:50:21	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			06:23:20	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			06:23:23	* Headcount Present	MED2	1734
			07:27:13	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			07:27:16	* Accepted Meal	MED2	1734
			09:48:40	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			11:50:05	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			11:50:09	* Accepted Meal	MED2	1734
			14:26:06	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1709
			17:07:07	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1734
			17:07:11	* Accepted Meal	MED2	1734
			18:08:05	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1708
			18:08:51	NS# Headcount Present	MED2	1708
			18:40:00	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			19:44:31	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			21:00:39	* Well-Being Check Inmate and Cell OK (MED2)	MED2	1761
			21:01:13	* To Hour out	MED2	1761
			23:17:44	* Well-Being Check Inmate and Cell OK (MED2) - Not Present - Hour out	MED2	1708

* Cell or Out of Cell Tag Scan | ** Pod or Run Tag Scan | *** Wristband/ID Card Scan | (No asterisk) No tag was scanned | NS# Mobile Command Population | W# Website Entry

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

JASON MATTHEW LYNCH,

PLAINTIFF

v.

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

WHITE COUNTY, ARKANSAS, et al.,

DEFENDANTS

EXHIBIT 5

Prior factual statement, Doc. 22, pages 39, 40, 42, and 45

Purpose: Corroborates the pleaded floor-sleeping, sanitation-notice, rotten-food, and August 19 yard-call facts restated in the declaration.

ALLEGATIONS:

A. Conditions of Confinement

On 6-10-24 Sgt Rogers placed me in "F" pod. However at the time the pod was overly full forcing me to sleep on the floor, not even in a cell. The day area was (where myself and others) had to sleep was flooded with shower and toilet back up. We (Inmates and my-self) used jumpsuits to make waterlogged barriers to try and mitigate the raw sewage to area close to shower and toilets. Request and complaints were filled; Captain Edwards only responded "so" and "noted" from 6-10-24 till 8-22 the over flow was never fixed. Due to being forced to sleep on the floor, a skin rash or sores soon occurred. Edwards, Rogers, Medical staff all knew I was forced to sleep on the floor and of skin infection, but just responded "so", "noted", and no treatment given. I had to use floor cleaner to treat infection

Conditions of Confinement:

B. over 35 inmates had to share 1 shower that was 3 feet by 3 feet, the shower did not drain right, and was engrossed with Black ^{mold} ~~mold~~. From 6-15 to upon my exit from WDC over 10 Grievances were filed with Captain Edwards only responding "So ^{no} noted". During this time myself and others had headaches and developed Breathing issues. I ~~know~~ ^{now} have fungus in my lungs that can be seen by a normal body scan. Still have breathing issues. Co Wood, Co Jones Sgt Swindle, and Lt Ross all knew of the shower by means of my own mouth and by means of seeing it for them self, yet nothing was done. They said they sprayed Bleach. ~~However this seldom ever happened~~

C. from 8-23 till 9-7 while in lock down the shower was also full of black mold but also blood and human waste, the cell in medical also had Blood and human waste on the walls. This was reported & grieved, yet unresolved

Conditions of Confinement:

E. 6-28 to 8-23 while in F-4 I had no drinkable water, no cold water, only water hot enough to burn, and at times I was burned while washing my hands in my cell sink, this to was reported to caption edwards by his staff and ~~also~~ ^{also} by the other inmates in my cell. Yet nothing was ever done, never fixed

F. While at WCOE I was given rotten food to eat ^{8th} ~~8~~ different times. I showed the food to CO wood, Sgt Swindle, and Sgt Rogers for them to respond "eat around it" or "eat it" one of the times the rotten food was taken by Sgt Swindle, and no other food was ever brought back, I did not eat that meal, no food was ever given back to me. I went hungry that day other time the rotten food made us sick as hell

Conditions of Confinement

J T My entire stay at WDC we were never given a way to clean our sinks and toilets, when we asked for Bowl Brush or rags Co Rogers, Co Wood, & Co Swindle would laugh and tell us its not their job. Only supplies we were ever given was a mop with cleaner. Just 1 for 30 or more inmates to use. This caused a staff out break. When grived Lt Ross did not respond only FWD to Edwards who responded "So" "noted". This was from 8-10 till I moved to lock down on or about 2-23, was never treated for staff I had to dump/soak it with floor cleaner

S 8-19 Pod F was denied yard call, Co workman, Co Swindle, Co Rogers told the pod it was due to my 1983 and they were mad at me, is why we got no yard call, but other pods did. They were trying to get me hurt, making me fight for my safety - and did get me jumped hurt