
Re: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]

From Kaylen Lewis <lewis@jowenslawfirm.com>

Date Tue 6/9/2026 9:53 AM

To Jason Lynch <jlynch@abtechcs.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>; Rylie Slone <rslone@hallboothsmith.com>

Cc Lorna Pennington <lpennington@hallboothsmith.com>

Mr. Lynch -

I apologize, as I was out of the office yesterday and was unable to meet with the staff here regarding your discovery requests. At this time, we have no knowledge of receiving the discovery requests via mail. As Ms. Loy stated in her previous email, discovery cannot be served through the ECF system. We will take the discovery requests received yesterday and respond, pursuant to the Court Order limiting discovery, within 30 days of receipt.

Thank you,

Kaylen Lewis
Attorney



Mailing Address: P.O. Box 850

Conway, Arkansas 72033-0850

Physical Address: 1160 Markham Street

Conway, Arkansas 72032

Office: (501) 764-4334

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lewis@jowenslawfirm.com

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From: Jason Lynch <jlynch@abtechcs.com>

Sent: Monday, June 8, 2026 8:12 PM

To: Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>; Kaylen Lewis <lewis@jowenslawfirm.com>; Rylie Slone <rslone@hallboothsmith.com>

Cc: Lorna Pennington <lpennington@hallboothsmith.com>

Subject: Re: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]

subject: Second Notice – Outstanding Discovery Requests

Date: 6-8-26

To: Owens Parker Law Firm
Conway, Arkansas

Dear Counsel,

This letter serves as a **second notice to** Owens Parker Law Firm **and additional attempt** to obtain responses to the discovery requests I previously served upon your office.

As of today, I have not received the requested discovery materials, nor any communication addressing the status of your response. These materials are necessary to move this matter forward and to ensure compliance with applicable procedural rules.

Please consider this correspondence a **formal follow-up request**. I ask that you provide full and complete responses to the outstanding discovery no later than **tomorrow, 6-9-26**.

If I do not receive a response within that timeframe, I will have no alternative but to **seek court intervention**, including filing a motion to compel discovery and requesting any appropriate relief the Court deems necessary.

I would prefer to resolve this matter without involving the Court and expect your prompt attention to this issue.

Thank you in advance for your cooperation.

Sincerely,



Jason Lynch
Operations Mgr & Network Engineer,
AbTechCs.com

501-605-4481

501-920-2107

Jlynch@abtechcs.com

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From: Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>

Sent: Monday, June 8, 2026 2:29 PM

To: Jason Lynch <jlynch@abtechcs.com>; lewis@jowenslawfirm.com <lewis@jowenslawfirm.com>; Rylie Slone <rlsone@hallboothsmith.com>

Cc: Lorna Pennington <lpennington@hallboothsmith.com>

Subject: RE: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]

Mr. Lynch,

I circled back with my office staff on this after receiving your email, and they said we did in fact receive discovery requests, but the deadline never made it to the calendar. So you were correct; you did serve discovery requests. I apologize for the misunderstanding on our end.

Will you agree to give us a 30-day extension from today's date to get our responses to you?

From: Jason Lynch <jlynch@abtechcs.com>

Sent: Monday, June 8, 2026 10:07 AM

To: Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>; lewis@jowenslawfirm.com; Rylie Slone <rlsone@hallboothsmith.com>

Cc: Lorna Pennington <lpennington@hallboothsmith.com>

Subject: Re: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]

Ms Loy.

I understand that i only did so make sure someone could not say they did not have notice, did not see it, or did not get it.. but thank you for making sure i know the rules, as yes there are a lot and its headache doing this no formal legal training; in fact, its very very hard..

My intent in including docketing it was make sure everyone saw it. I suspected it needed to be sent directly to you and i did that as well. the additional recipients and methods was solely to ensure that all relevant parties had notice of the discovery requests and to avoid any later dispute regarding awareness.

As you acknowledged, i assume you clearly have notice of the requests.

For clarity, the discovery requests were also served via U.S. Mail on May 12, 2026, to your office, Owens Parker, the White County Detention Center administration, and Clayton Edwards.

Please confirm that you will proceed with responding to the discovery requests within the applicable timeframe or advise whether you are requesting an extension.

Thank you for the pointers. If I ever seem overly direct, please understand it is not directed at you, but reflects what the Defendants have put me through.

i saw my doctor yesterday, and the damage to my immune system over those 100 days has been significant and, unfortunately, is not repairable, so i'm unset.. All this because Edwards with no medical background thought he knew better than my Doctor. Anyways , Thank you and have a Blessed Day

Respectfully,
Jason M. Lynch

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"Better three hours too soon than a minute too late." - William Shakespeare

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From: Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>
Sent: Monday, June 8, 2026 9:41 AM
To: Jason Lynch <jlynch@abtechcs.com>; lewis@jowenslawfirm.com <lewis@jowenslawfirm.com>; Rylie Slone <rs lone@hallboothsmith.com>
Cc: Lorna Pennington <lpennington@hallboothsmith.com>
Subject: RE: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]

Discovery cannot be served through the ECF system, and I believe the court has notified you of this, but I am just making you aware because there are a lot of nuances in federal court. All discovery must be served through email or hard copy mail.

Thank you for forwarding on your discovery requests. We will docket a 30-day deadline from today and will respond accordingly.

From: Jason Lynch <jlynch@abtechcs.com>
Sent: Monday, June 8, 2026 9:34 AM
To: Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>; lewis@jowenslawfirm.com; Rylie Slone <rs lone@hallboothsmith.com>
Cc: Lorna Pennington <lpennington@hallboothsmith.com>
Subject: Re: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]
Importance: High

You don't often get email from jlynch@abtechcs.com. [Learn why this is important](#)
Subject: Discovery Requests – Service and Response Deadline

Counsel,

Thank you for your response.

I understand your position regarding communications with represented Defendants. There was no intent to engage in any improper communication, and there will be. As a pro se litigant, I believed it was permissible to include Defendants on communications concerning discovery and preservation issues., as i did. However, I will direct all future communications regarding represented Defendants exclusively to counsel of record.

That said, your assertion that your office was not served with, or placed on notice of, my discovery requests is not accurate.

The earliest notice was 08/08/2026-- Leave to conduct targeted Discovery

The discovery requests were filed and docketed through CM/ECF, which constitutes notice to all counsel of record. In addition, the Court expressly authorized targeted discovery, and multiple related filings were made on the docket in both cases. These filings, taken together, provided clear and repeated notice of the discovery requests and the scope of discovery permitted by the Court.

For clarity, the relevant docket activity includes:

- **Case No. 4:24-cv-00740-LPR-BBM**
 - 08/08/2026-- Leave to conduct targeted Discovery
 - 05/11/2026 – Order granting Motion for Discovery
 - 05/14/2026 – Motion for Discovery
 - 05/15/2026 – Motions for Discovery
- **Case No. 4:26-cv-00118-JM-JJV**
 - 08/08/2026-- Leave to conduct targeted Discovery
 - 05/11/2026 – Scheduling Order authorizing targeted discovery
 - 05/15/2026 – Motion for Discovery

Both discovery requests were docketed in mid-May 2026. Given the Court's orders and the docketed filings, Defendants were on notice and cannot reasonably claim otherwise.

Further, I expressly reject the characterization that no discovery was served. The record reflects otherwise. At a minimum, if Defendants contend service was deficient, the appropriate course would have been to raise that issue promptly, not remain silent as the response deadline approaches.

For the avoidance of doubt, I specifically docketed my discovery requests on CM/ECF for the very purpose of ensuring that all counsel of record received notice and to eliminate any later claim that service did not occur.

Given the multiple docket entries related to discovery, the Court's orders expressly authorizing targeted discovery, and my additional service by U.S. Mail, it is not reasonable to assert that Defendants or counsel lacked notice of the requests. The record reflects repeated and clear notice through multiple channels.

Under these circumstances, the suggestion that Defendants were unaware of the discovery requests is not credible, particularly in light of the Court's orders and the volume of related filings appearing on the docket.

The 30-day response period is now at or near expiration. Accordingly, Defendants must either:

1. Serve full responses, objections, and responsive production immediately; or
2. State, with specificity, the legal basis for refusing or delaying compliance.

If Defendants seek additional time, that request must be clearly stated and justified. Absent such a request, I will proceed on the basis that Defendants are electing not to comply.

This correspondence constitutes a continued good-faith effort to resolve this dispute. However, if complete responses are not received promptly, I will move to compel under Rule 37 and seek all appropriate relief, including sanctions, costs, and any other remedies available under the Federal Rules.

Please confirm, without delay, whether Defendants will provide responses and production or whether they are refusing to do so.

Respectfully,
Jason Matthew Lynch
Plaintiff, Pro Se

[172](#)

05/11/2026 SCHEDULING ORDER: The served Defendants' motion for summary judgment on the issue of exhaustion is due on or before 6/22/2026. Discovery unrelated to the issue of exhaustion and the identity of the Doe Defendants is stayed until further order of the Court. On or before 6/22/2026, Plaintiff must file a Motion for Service, containing the information necessary to identify the Doe Defendants. For good cause, the time to serve the Doe Defendants is extended to 8/10/2026. Signed by Magistrate Judge Benecia B. Moore on 5/11/2026. (kdr)

[175](#)

05/15/2026 MOTION for Discovery by Jason Lynch. (ajs)

87

05/11/2026 (This is a TEXT ENTRY ONLY. There is no pdf document associated with this entry.) ORDER granting [81](#) Motion for Discovery. Signed by Magistrate Judge Joe J. Volpe on 5/11/2026. (lej)

[91](#)

05/14/2026 MOTION for Discovery by Jason Matthew Lynch. (ajs)

[92](#)

05/15/2026 MOTION for Discovery by Jason Matthew Lynch. (ajs)

[94](#)

05/15/2026 MOTION for Discovery by Jason Matthew Lynch. (ajs)

Jason Lynch
Operations Mgr & Network Engineer,
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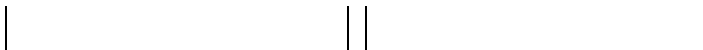
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From: Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>
Sent: Monday, June 8, 2026 8:43 AM

To: Jason Lynch <jlynch@abtechcs.com>; lewis@jowenslawfirm.com <lewis@jowenslawfirm.com>; Rylie Slone <rs lone@hallboothsmith.com>

Cc: Lorna Pennington <lpennington@hallboothsmith.com>

Subject: RE: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention [HBS-DMS.FID3001963]

Mr. Lynch,

You cannot contact represented defendants directly. All communications must be directed to their counsel of record. Please do not directly contact represented defendants again.

Regarding your discovery requests, you never served our office with discovery requests. Please forward the discovery requests and we will docket a 30-day response deadline on our end.

Thank you.

From: Jason Lynch <jlynch@abtechcs.com>

Sent: Sunday, June 7, 2026 4:49 PM

To: lewis@jowenslawfirm.com; Rylie Slone <rs lone@hallboothsmith.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>

Cc: claytonedwards@wco.co; ashleywattphotography@gmail; Jason Lynch <jlynch@abtechcs.com>

Subject: Lynch's good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention

Importance: High

You don't often get email from jlynch@abtechcs.com. [Learn why this is important](#)

I am sending this correspondence as a good-faith effort to confer with opposing counsel and the Defendants regarding outstanding discovery requests before seeking court intervention pursuant to Rule 37(a)(1) of the Federal Rules of Civil Procedure.

This email concerns my First Set of Discovery Requests served in the following actions:

Lynch v. Does, et al., Case No. 4:24-cv-00740-LPR-BBM

Lynch v. White County, et al., Case No. 4:26-cv-00118-JM-JJV

My discovery requests were served on May 11, 2026, by U.S. Mail and through the CM/ECF filing system. Accordingly, all counsel and parties received actual notice of the requests. Close to thirty (30) days have now elapsed, and I have not received responses, objections, requests for extension, privilege logs, supplemental responses, or any other communication regarding the discovery requests.

Per prison mail box rule 5-11 is the filing date or date served

This email constitutes my second request for these materials. My original discovery requests have gone unanswered.

As you are aware, the Federal Rules of Civil Procedure require timely responses to interrogatories, requests for production, and requests for admission. See Fed. R. Civ. P. 33(b)(2), 34(b)(2)(A), and 36(a)(3). The failure to respond within the prescribed time may result in waiver of objections and may justify an order compelling discovery and the imposition of sanctions under Rule 37.

Additionally, both federal courts have already authorized targeted discovery in these matters.

The Court previously granted targeted discovery concerning:

- All grievances and requests to staff submitted by Mr. Lynch through the jail kiosk/mail system;
- Discovery necessary to identify all Doe Defendants;
- Records necessary to determine the identity and involvement of jail personnel and medical staff involved in the events alleged in the complaints.

Accordingly, I am again requesting production of the following records and information:

1. Duty Rosters and Personnel Identification

All duty rosters from June 1, 2024, through September 7, 2024, including but not limited to:

- Detention officers;
- Supervisors;
- Sergeants;
- Lieutenants;
- Captains;
- Jail administrators;
- Medical personnel;
- Contract medical personnel;
- Maintenance personnel;
- Contract employees;
- Attorneys and legal staff working within the detention facility;
- Any individual assigned duties within White County Detention Center during the relevant period.

The rosters should identify each employee's name, rank, position, job title, shift assignment, dates worked, and assigned work locations.

2. Grievances, Requests to Staff, Appeals, and Communications

All grievances, requests to staff, appeals, responses, messages, communications, and related records submitted by Jason M. Lynch during the relevant period.

These records should be produced:

- In native electronic format;
- Unredacted except where legally required;

- With all associated tracking numbers;
- Including all responses;
- Including all appeal responses;
- Including all audit logs;
- Including all metadata and tracking logs;
- Including records reflecting receipt, routing, review, assignment, and closure.

3. Identification of Doe Defendants

Records sufficient to identify:

- Nurse F;
- Individuals responsible for medication administration decisions;
- Individuals responsible for court transport decisions;
- Individuals responsible for housing assignments;
- Individuals responsible for pod movements;
- Individuals responsible for pulling Mr. Lynch from housing units;
- Individuals responsible for court packet preparation;
- Individuals responsible for approving or denying transportation to White County civil court proceedings;
- Any individual involved in the alleged constitutional violations described in the complaints.

4. Conditions of Confinement and Related Grievances

All grievances, complaints, incident reports, requests, communications, investigations, and responses relating to:

- Lynch his grievances and all communications from lynch to staff and staff to lynch communications

5. *Preservation of Evidence*

I further remind Defendants and counsel that multiple litigation hold and preservation notices were sent beginning in September 2024 and continuing thereafter. To my knowledge, at least four separate notices were transmitted advising White County, jail officials, medical providers, and related entities of pending and anticipated litigation.

Accordingly, Defendants had a duty to preserve potentially relevant evidence. See Fed. R. Civ. P. 26, 34, and 37(e). The preservation obligation arose no later than receipt of

those notices and certainly existed once litigation became reasonably foreseeable.

The requested records should therefore have been preserved and maintained.

Please consider this correspondence a formal good-faith attempt to resolve this discovery dispute without court intervention. If I do not receive complete responses or meaningful communication regarding production within a reasonable period, I will have no alternative but to seek relief from the Court through a Motion to Compel pursuant to Rule 37 and request any additional relief deemed appropriate, including sanctions, expenses, adverse inferences, or other remedies authorized by the Federal Rules.

This email may/will be submitted to the Court as evidence of my good-faith effort to confer before filing a motion to compel.

Counsel for all appearing Defendants, including Defendants Edwards and Watts, are being copied on this correspondence.

I look forward to your prompt response and hope this matter can be resolved without the need for court intervention.

Respectfully,

Jason M. Lynch
Plaintiff, Pro Se

Lynch v. Does, et al.
Case No. 4:24-cv-00740-LPR-BBM

Lynch v. White County, et al.
Case No. 4:26-cv-00118-JM-JJV

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5/11/2026. (lej)

05/11/2026 SCHEDULING ORDER: The served Defendants' motion for summary judgment on the issue of exhaustion is due on or before 6/22/2026. Discovery unrelated to the issue of exhaustion and the identity of the Doe Defendants is stayed until further order of the Court. On or before 6/22/2026, Plaintiff must file a Motion for Service, containing the information necessary to identify the Doe Defendants. For good cause, the time to serve the Doe Defendants is extended to 8/10/2026. Signed by Magistrate Judge Benecia B. Moore on 5/11/2026. (kdr)

Jason Lynch
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