

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

RECEIVED  
US DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

SUBJECT: RE: Notice regarding Ashley Watts received at 10:58 AM  
DATE: 03/24/2026 04:06:04 PM

TAMMY H. DOWNS

MAR 30 2026

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

TAMMY H. DOWNS, CLERK  
By: *[Signature]*  
DEP CLERK

JASON MATTHEW LYNCH  
Reg. No. 07405-510  
Plaintiff

v. Case No. 4:24-cv-00740-LPR-BBM

DOES, et al.  
Defendants

NOTICE REGARDING THE RECEIVED ANSWER FROM ASHLEY WATTS, THAT DOES NOT APPEAR ON PACER

COMES NOW Plaintiff, Jason Matthew Lynch, proceeding pro se, and respectfully submits this Notice to the Court, stating as follows:

#### 1. Receipt of Off-Docket Response

Plaintiff states that on or about March 23, 2026, he received through the institutional mail at FCI El Reno a handwritten answer purportedly from Defendant Ashley Watts. it is attached to this notice

To the best of Plaintiff's knowledge, and after review of the docket via available means, this response does not appear on PACER as of March 23, 2026, at approximately 1:00 PM.

#### 2. Improper Filing / Failure to Comply with Federal Rules

Under Federal Rule of Civil Procedure 5(d)(1), all pleadings and papers after the complaint must be filed with the Court. Service alone, without filing, is improper.

Further, Rule 10(b) requires claims and defenses to be stated in numbered paragraphs, and Rule 8(b) requires a party to:

Admit or deny each allegation,

Fairly respond to the substance of the allegations, and

Avoid evasive or conclusory denials.

The handwritten response received by Plaintiff does not comply with these rules and appears to be an improper, off-docket attempt to respond.

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### 3. Continued Failure to Faithfully Answer the Third Amended Complaint

Even if considered, the response fails to fully and faithfully answer Plaintiff's Third Amended Complaint (TAC).

Plaintiff respectfully notes that:

The response contains blanket denials,

It lacks structured admissions or denials as required under Rule 8(b), and

It fails to address the substantive factual allegations supported by extensive evidence already referenced in prior filings.

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### 4. Internal Contradictions Within Defendant Watts' Own Statements

Defendant Watts' own statements contain material contradictions.

On page 2, Defendant Watts denies allegations regarding improper medication handling.

However, on page 7, Defendant Watts admits that medications were crushed or dissolved in water because inmates had medications in their cells.

This admission directly supports Plaintiff's core claim regarding alteration of prescribed medications, including antiretroviral therapy (ART).

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### 5. Admission of Alteration of HIV Medication

Plaintiff has consistently alleged that his HIV ART medications were crushed or otherwise altered.

This is critical because:

CDC guidelines,

Manufacturer instructions, and

The recognized HIV standard of care

all establish that ART medications are not to be crushed, split, or altered, as doing so:

Alters dosage,

Risks subtherapeutic exposure,

Promotes viral resistance, and

Causes long-term medical harm.

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Crushing medications often resulted in loss of medication within crushing bags, effectively reducing dosage.

Defendant Watts' admission that medications were crushed or dissolved confirms Plaintiff's allegations and directly contradicts the blanket denials made by other Defendants.

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#### 6. Evidence of Bad Faith and Misrepresentation

Defendant Watts' statements demonstrate that:

Defendants have denied conduct that clearly occurred,

Material facts are being withheld, and

Counsel and Defendants are advancing positions inconsistent with known facts.

This raises serious concerns under:

Rule 11(b) (representations to the Court must have evidentiary support),

The Court's inherent authority to address bad faith litigation conduct, and

Established precedent that pleadings must not be used to mislead or delay proceedings.

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#### 7. Policy-Based Liability (Monell Claim)

Defendant Watts also mischaracterizes Plaintiff's claims by suggesting he alleged being singled out.

Plaintiff clarifies:

He never claimed individualized targeting,

He alleged the existence of a policy or custom requiring medications to be crushed,

This policy was implemented by non-medical staff (Edwards), and

Medical staff deferred responsibility back to Edwards.

This directly supports liability under Monell v. Department of Social Services, as:

A policy created or enforced by officials,

Causing constitutional harm,

Establishes municipal liability.

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8. False Statements Regarding Medical Intake and Knowledge

Defendant Watts further claims that Plaintiff failed to inform staff of his medical needs.

This is factually incorrect, as:

Plaintiff informed medical intake staff,

Plaintiff's wife provided medical <sup>meds (Bikday)</sup> ~~documentation~~, which was approved by Watts after delay,

Defendant Watts, as a medical professional, knew or should have known the nature and necessity of ART medications, and

Plaintiff submitted multiple medical requests, which were ignored for extended periods (approximately 60+ days).

These facts demonstrate deliberate indifference under the Eighth and Fourteenth Amendments.

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9. Pattern of Blanket Denials by All Defendants

Plaintiff respectfully notes a broader pattern:

All Defendants have issued blanket denials,

Even as documentary, testimonial, and now Defendant admissions confirm key facts,

Suggesting a coordinated effort to avoid accountability rather than engage in good-faith litigation.

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10. Request for Court Intervention

WHEREFORE, Plaintiff respectfully PRAYS that this Honorable Court:

1. Take judicial notice of the improper, off-docket response by Defendant Watts;
2. Require that any response be properly filed on the docket in compliance with the Federal Rules;
3. Consider the inconsistencies and admissions contained therein as evidence of bad faith and lack of truthful pleading;
4. Issue an order requiring Defendants to fully and faithfully answer the TAC in compliance with Rules 8 and 10;
5. Enter or enforce a litigation hold and preservation order to prevent spoliation of critical evidence (including medical records, jail logs, video, and communications);
6. Alternatively, move this matter into discovery with all haste to prevent further prejudice; and
- 7.. Grant any other relief this Court deems just and proper.

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11. Respectful Closing

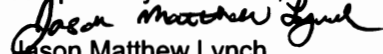
Plaintiff submits this Notice with the utmost respect for the Court and emphasizes that this matter is not a mere dispute of words, but a case supported by:

Documentary evidence,

Witness testimony, and

Now, Defendant admissions confirming key allegations.

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Respectfully submitted,



Jason Matthew Lynch

Reg. No. 07405-510

Pro Se Plaintiff

FCI El Reno

FCM LG ENV  
MONTICELLO, AR 71655  
MAR 18, 2026



\$8.02

S2324K500210-02

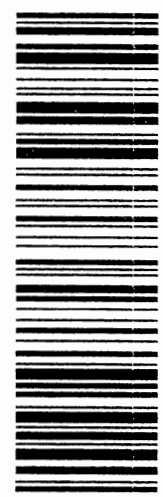


73036

RDC 99

FROM:

104east 14th Street  
Jacksonia AR 71603



9589 0710 5270 3433 9349 87

TO:

Jason Lynch  
Reg #07408-610  
El Reno Federal Correctional Institution  
Inmate/Parcels  
El Reno OK 73036

RECEIVED

Date 3/23/26

Time 1300

Initials JL

Table Photo Document Mailer

12 1/4"

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

## UNITED STATES DISTRICT COURT

for the

Eastern District of Arkansas



CENTRAL Division

JASON LYNCH

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ASHLEY WATT

Jury Trial: (check one) ☐ Yes ☐ No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## THE DEFENDANT'S ANSWER TO THE COMPLAINT

## I. The Parties Filing This Answer to the Complaint

Provide the information below for each defendant filing this answer or other response to the allegations in the plaintiff's complaint. Attach additional pages if needed.

|                    |                                 |
|--------------------|---------------------------------|
| Name               | ASHLEY WATT                     |
| Street Address     | 104 E 14TH                      |
| City and County    | JUDSONIA WHITE                  |
| State and Zip Code | AR 72081                        |
| Telephone Number   | 501-438-5336                    |
| E-mail Address     | ASHLEYWATTPHOTOGRAPHY@GMAIL.COM |

## II. The Answer and Defenses to the Complaint

## A. Answering the Claims for Relief

On a separate page or pages, write a short and plain statement of the answer to the allegations in the complaint. Number the paragraphs. The answer should correspond to each paragraph in the complaint, with paragraph 1 of the answer corresponding to paragraph 1 of the complaint, etc. For each paragraph in the complaint, state whether: the defendant admits the allegations in that paragraph; denies the allegations; lacks sufficient knowledge to admit or deny the allegations; or admits certain allegations but denies, or lacks sufficient knowledge to admit or deny, the rest.

From allegations in section II.A.

- A. Defendant denies allegations. Defendant did not approve or deny medications to be administered by other nurses. The facility physician gave orders for the medications administered.
- B. Defendant denies allegations. Defendant was the Lead Nurse and Plaintiffs' medication were scheduled for PM med pass per his request. Defendant administers medication per provider's orders when administering any medication.

**B. Presenting Defenses to the Claims for Relief**

Write a short and plain statement identifying the defenses to the claims, using one or more of the following alternatives that apply.

1. The court does not have subject-matter jurisdiction over the claims because *(briefly explain why there is no federal-question jurisdiction or diversity-of-citizenship jurisdiction; see the complaint form for more information)*  

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2. The court does not have personal jurisdiction over the defendant because *(briefly explain)*  

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3. The venue where the court is located is improper for this case because *(briefly explain)*  

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4. The defendant was served but the process-the form of the summons-was insufficient because *(briefly explain)*  

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5. The manner of serving the defendant with the summons and complaint was insufficient because *(briefly explain)*  

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6. The complaint fails to state a claim upon which relief can be granted because *(briefly explain why the facts alleged, even if true, are not enough to show the plaintiff's right to recover)*  

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7. Another party *(name)* \_\_\_\_\_ needs to be joined (added) in the case. The reason is *(briefly explain why joining another party is required)*  

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- a. If the basis for subject-matter jurisdiction is diversity of citizenship, state the effect of adding the other party:

The other party is a citizen of the State of *(name)* \_\_\_\_\_.

Or is a citizen of *(foreign nation)* \_\_\_\_\_. The amount of damages sought from this other party is *(specify the amount)* \_\_\_\_\_.

- b. If the claim by this other party is based on an alleged violation of a federal constitutional or statutory right, state the basis:

**C. Asserting Affirmative Defenses to the Claims for Relief**

Identify an affirmative defense or avoidance that provides a basis for the defendant to avoid liability for one or more of the plaintiff's claims even if the basis for the claim is met. Any affirmative defense or avoidance must be identified in the answer. Include any of the following that apply, as well as any others that may apply.

The plaintiff's claim for *(specify the claim)*

medical - deliberate - indifference

is barred by *(identify one or more of the following that apply)*:

1. Accord and satisfaction *(briefly explain)*

2. Arbitration and award *(briefly explain)*

3. Assumption of risk *(briefly explain)*

4. Contributory or comparative negligence of the plaintiff *(briefly explain)*

5. Duress *(briefly explain)*

Jason Lynch told jail staff he had no medical needs when he was booked in which caused delay in medical intake being done.

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6. Estoppel *(briefly explain)*

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7. Failure of consideration *(briefly explain)*

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8. Fraud *(briefly explain)*

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9. Illegality *(briefly explain)*

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10. Injury by fellow employee *(briefly explain)*

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11. Laches (Delay) *(briefly explain)*

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12. License *(briefly explain)*

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13. Payment *(briefly explain)*

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14. Release *(briefly explain)*

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15. Res judicata *(briefly explain)*

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16. Statute of frauds *(briefly explain)*

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17. Statute of limitations *(briefly explain)*

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18. Waiver *(briefly explain)*

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19. Other *(briefly explain)*  
 Jason Lynch was moved to medical for observation after he claimed his medicine made him sick. While in medical, Jason Lynch stated he wasn't sick from medication administration rather he preferred to take

**D. Asserting Claims Against the Plaintiff (Counterclaim) or Against Another Defendant (Cross-Claim)**

For either a counterclaim against the plaintiff or a cross-claim against another defendant, state briefly the facts showing why the defendant asserting the counterclaim or cross-claim is entitled to the damages or other relief sought. Do not make legal arguments. State how each opposing party was involved and what each did that caused the defendant harm or violated the defendant's rights, including the dates and places of that involvement or conduct. If more than one counterclaim or cross-claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

1. The defendant has the following claim against the plaintiff *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

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2. The defendant has the following claim against one or more of the other defendants *(specify the claim and explain it; include a further statement of jurisdiction, if needed)*:

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3. State briefly and precisely what damages or other relief the party asserting a counterclaim or cross-claim asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons that are alleged to entitle the party to actual or punitive money damages.

his medication whole. The reason medications were crushed or dissolved in water was because several inmates medication was found in their cells which indicated they were not taking the medicine. Inmates were sharing medications. Jason Lynch was not singled out for medication administration.

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- a. The defendant asserting the counterclaim or cross-claim against *(specify who the claim is against)* \_\_\_\_\_ alleges that the following injury or damages resulted *(specify)*:
- \_\_\_\_\_

- b. The defendant seeks the following damages or other relief *(specify)*:
- \_\_\_\_\_

### III. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this answer: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the answer otherwise complies with the requirements of Rule 11.

#### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3.17.24

Signature of Defendant

Printed Name of Defendant

awatt

Ashley watt

#### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Pro Se 3 (Rev. 12/16) The Defendant's Answer to the Complaint

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Telephone Number

E-mail Address