

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

JASON MATTHEW LYNCH,	)	Case No. 4:26-cv-00118-JM-JJV
Plaintiff,	)	
v.	)	
WHITE COUNTY JAIL; WHITE COUNTY,	)	
ARKANSAS;	)	
CLAYTON EDWARDS; and JOHN/JANE	)	
DOES,	)	
Defendants.	)	

**PLAINTIFF’S NOTICE OF FAILURE TO RECEIVE DISCOVERY RESPONSES,
MOTION TO COMPEL DOE-IDENTIFICATION DISCOVERY, AND MOTION FOR
EXTENSION OF TIME TO IDENTIFY DOE DEFENDANTS**

COMES NOW Plaintiff Jason Matthew Lynch, proceeding pro se, and respectfully submits this Notice and Motion requesting that the Court compel Defendants to respond to Plaintiff’s properly served Doe-identification discovery and extend the deadline for identifying and naming Doe Defendants.

In support, Plaintiff states as follows:

I. INTRODUCTION

Plaintiff filed this action concerning unconstitutional conditions of confinement at the White County Detention Center occurring during Plaintiff’s confinement from June 9, 2024, through September 9, 2024. The complaint identifies multiple unknown correctional officers and staff members who participated in, knew of, or failed to correct unconstitutional conditions. The Court has allowed Plaintiff the opportunity to identify Doe Defendants through targeted discovery. Plaintiff has diligently attempted to obtain this information. However, despite serving discovery requests and repeatedly attempting communication with defense counsel and White County, Plaintiff has received zero discovery responses in this case. Without Defendants’ responses, Plaintiff cannot determine the identities of the Doe Defendants and cannot properly amend the

complaint or proceed against the responsible individuals.

II. PLAINTIFF SERVED TARGETED DOE-IDENTIFICATION DISCOVERY

Plaintiff served Defendants with a First Doe-Identification Discovery Packet containing narrowly tailored interrogatories and requests for production. The discovery was not broad merits discovery. It was specifically limited to identifying correctional officers assigned to Plaintiff's housing unit; supervisors responsible for the housing unit; maintenance personnel responsible for sewage, mold, and sanitation issues; recreation personnel; food and water responsibility personnel; grievance responders; officers conducting rounds; and individuals responsible for malfunctioning cell locks.

Plaintiff specifically requested information necessary to identify the individuals responsible for the claims remaining in this case. Plaintiff's discovery packet was sent for service on defense counsel and was expressly identified as discovery requests limited to identifying Doe Defendants.

III. PLAINTIFF HAS RECEIVED NO RESPONSE FROM DEFENDANTS

Since serving discovery, Plaintiff has attempted multiple times to obtain compliance. Plaintiff has:

- a. Sent three separate emails to defense counsel regarding the outstanding discovery;
- b. Sent three separate USPS mailings to defense counsel regarding the outstanding discovery;
- c. Sent correspondence directly to White County Detention Center;
- d. Submitted an additional FOIA/public records request to White County seeking information necessary to identify responsible individuals.

Every attempt has been met with no meaningful response. Plaintiff has received no interrogatory answers, objections, requests for extension, production responses, or explanation for noncompliance. The complete lack of communication has prevented Plaintiff from moving this

case forward.

IV. MEDICAL CASE DISCOVERY DOES NOT RESOLVE THIS CASE

Plaintiff acknowledges that discovery responses were received in the related medical case, Case No. 4:24-cv-00740-LPR-BBM. Plaintiff attempted to utilize that information to assist with identification issues here. However, the response produced a massive list of medical personnel and records rather than identifying the Defendants responsible for the conditions-of-confinement claims in this case. The production included hundreds of medical personnel names, duplicate names, and staffing records from White County medical operations. While that information may assist with medical claims, it does not identify the correctional officers, supervisors, maintenance personnel, recreation personnel, food-service personnel, or other jail employees responsible for the conditions challenged in this action.

Plaintiff remains unable to identify the proper Doe Defendants without cooperation from Defendants in this case.

V. PLAINTIFF CANNOT PROCEED WITHOUT DOE IDENTIFICATION

Plaintiff is proceeding without counsel. The identities of the Doe Defendants are exclusively controlled by White County and its agents. Plaintiff cannot obtain this information through independent investigation. Plaintiff cannot properly amend his complaint, serve defendants, or prosecute this action until Defendants provide the requested identifying information. Dismissal or denial of additional time would unfairly penalize Plaintiff for Defendants' failure to provide information solely within their possession.

VI. REQUEST FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Enter an Order compelling Defendants to respond fully to Plaintiff's Doe-identification interrogatories and requests for production;
- b. Require Defendants to provide identifying information for all individuals who

may correspond to the remaining Doe Defendants;

- c. Extend the deadline for Plaintiff to identify and substitute Doe Defendants until at least thirty (30) days after complete discovery responses are received;
- d. Order Defendants to provide a written explanation if any requested records no longer exist, including when they were destroyed and under what retention policy;
- e. Grant any additional relief the Court finds just and proper.

Respectfully submitted,
Jason Matthew Lynch
Plaintiff, Pro Se
261 Wilson Loop
Ward, Arkansas 72176
812-405-5532
Date: _____

CERTIFICATE OF SERVICE

I certify that on this ____ day of _____, 2026, I served a true and correct copy of the foregoing upon:

Kaylen Suzanne Lewis, Esq.

Owens & Parker Law Firm, P.A.

Counsel for Defendants

by depositing same in the United States Mail, postage prepaid, and/or by electronic service as permitted.

Jason Matthew Lynch