

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

JASON LYNCH

PLAINTIFF

v.

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

DOES 2-3, CAPT. CLAYNTON EDWARDS, LT. ROSS
SGT. SWINDLE, SGT. WORKMAN, SGT. ROGERS,
CO WOOD, SGT. SCILER, CO GOODWIN, ASHLEY WATTS
KATYNN SMITH, TURNKEY, DOE 1

DEFENDANTS.

**MEDICAL DEFENDANTS' COMBINED RESPONSE TO PLAINTIFF'S
MOTIONS (DOCUMENTS 202, 203, 204, 205, 206, 207, 208, 209)**

Defendants, Turn Key Health Clinics, LLC, Ashley Watts, and Kaitlyn Smith (the "Medical Defendants"), submit their Combined Response¹ to Plaintiff's ECF filings from July 29, 2026 (Docs. 202 – 209²). Defendants' posture related to each of the respective Motions is as follows:

<u>Doc.</u>	<u>Title</u>	<u>Posture</u>
202	<i>Plaintiff's Reply in Support of His Position regarding TK Health's Discovery Responses</i>	Opposed
203	<i>Plaintiff's Omnibus Motion to Compel, for Supplemental Discovery, to Enter Material Facts into the Record, and to Add Additional Defendants</i>	Opposed in part

¹ Medical Defendants submit this Combined Response for efficiency and to limit the burden on judicial resources but note that Plaintiff's discovery requests were addressed only to Defendant TK Health, whereas the non-discovery relief sought by Plaintiff pertains to all Medical Defendants. And so, TK Health individually responds to the discovery issues presented, and Medical Defendants respond collectively to any other non-discovery relief sought by Plaintiff in his motions.

² Plaintiffs Motions filed as Docs. 208 and 209 are not directed to the Medical Defendants. *See, e.g.*, Doc. 208 at p. 3 ("Plaintiff acknowledges that discovery responses were received in the related medical care, Case No. 4:24-cv-00740-LPR-BBM. 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."); Doc. 209, p. 3 at V.

204	<i>Plaintiff's Omnibus Motion to Substitute Newly Identified Doe Defendants, Correct Party Names, Compel Identifying Discovery, Extend the Doe-Identification Deadline, and for Such Other Relief As Is Just</i>	Opposed in part
205	<i>Plaintiff's Notice of Good-Faith Efforts to Identify Doe Defendants, Motion for Limited Extension of Time to Identify and Substitute Doe Defendants, and Motion to Compel Targeted Supplemental Identification Responses</i>	Opposed in part
206	<i>Plaintiff's Notice of Disputed Authenticity, Apparent Alteration of Records, Forged or Non-Authentic Signature, and Request that Exhibits Be Entered into the Record</i>	Opposed in part
207	<i>Plaintiff's Consolidated Motion to Compel Complete Doe-Identification Responses, to Substitute Identified Pill-Nurse Defendants, for a Limited Extension of Time, and Incorporated Brief in Support</i>	Opposed in part
208	<i>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</i>	No response required, so no position taken
209	<i>Plaintiff's Notice to the Court regarding Good-Faith Efforts to Obtain Doe-Defendant Identification, Communications with Defense Counsel, and Request for Relief</i>	No response required, so no position taken

Plaintiff's eight motions in some instances present separate issues but, for the most part, have duplicative or overlapping issues presented to the Court. For expediency and to streamline the issues, Medical Defendants will attempt to streamline those issues categorically below with reference to the relevant ECF Documents and provide a succinct explanation of their position in response to each categorical issue raised and/or relief requested by Plaintiff:

No.	Issue Presented / Relief Requested	Motion(s)	Defendants' Position
1.	Plaintiff seeks an order compelling supplementation of TK Health's Responses to Plaintiff's Interrogatories to further identify medical personnel and jail personnel who had direct interaction with him.	Docs. 202, 203, 204, 205, 207, 208	Opposed
2.	Plaintiff seeks an order compelling supplementation of TK Health's Responses to	Docs. 202, 203, 204, 207	Opposed

	Plaintiff's Request for Production No. 3 to further identify "Nurse F."		
3.	Plaintiff seeks an order compelling supplemental production of records identifying medical personnel involved in Plaintiff's medication administration.	Doc. 203, 207	Opposed
4.	Plaintiff seeks an order compelling supplementation of TK Health's discovery responses to identify person(s) responsible for deciding whether Biktarvy would be crushed, floated, or dissolved.	Doc. 203, 204	Opposed
5.	Plaintiff seeks an order compelling supplementation of TK Health's discovery responses to identify policies, directives, or communications related to crushing Biktarvy.	Docs. 203, 206	Opposed
6.	Plaintiff seeks an order compelling supplementation of TK Health's discovery responses to identify records with pharmacists or prescribers regarding crushing Biktarvy.	Docs. 203, 204, 207	Opposed
7.	Plaintiff seeks an order compelling supplementation of TK Health's discovery responses to identify detention staff who directed or authorized conduct involving Officer Joseph Martin	Doc. 204	Opposed
8.	Plaintiff seeks an order compelling supplementation of TK Health's discovery responses to produce native electronic records, audit trails, metadata, revision histories, and user-access logs for disputed MARs and medical notes.	Docs. 204, 206, 207	Opposed
9.	Plaintiff seeks leave to amend his complaint to plead additional factual allegations, to correct party names, and to identify additional Doe Defendants. ³	Docs. 203, 204, 207	No position taken

³ Medical Defendants interpret Plaintiff's request as seeking leave to amend the complaint to include the factual allegations enumerated on pages 3-5 of Plaintiff's Motion (Doc. 203) and to identify Doe Defendants, and not as a request that the Court enter an order making findings of fact and, based on this assumption, take no position with respect to this requested relief. If the Court interprets Plaintiff's Doc.

10.	Plaintiff seeks an extension of time to identify and substitute Doe Defendants.	Docs. 204, 205	No position taken
11.	Plaintiff seeks leave “to supplement [Doc. 204] or seek further substitution upon receipt of the compelled discovery.	Doc. 204	Opposed
12.	Plaintiff seeks an order “determining, at the appropriate stage, whether any permitted substitution relates back under Fed. R. Civ. P. 15(c).	Doc. 204	Position reserved
13.	Plaintiff seeks to admit exhibits into the record without making any factual determinations.	Docs. 206, 207	Unopposed

For their Combined Response Brief, Medical Defendants rely upon Defendant TK Health’s Combined Responses to Plaintiff’s First and Second Sets of Discovery Requests (July 9, 2026), attached hereto as Exhibit 1. Medical Defendants request that, to the extent Medical Defendants object to Plaintiff’s requested relief within his eight motions, his requests be denied. Medical Defendants expound upon their stated positions, as indicated, in the Brief in Support filed contemporaneously with this Response.

Respectfully submitted,

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Clinics, LLC, and Kaitlyn Smith, and
Ashley Watts*

203 as seeking an order making findings of fact, Defendants object to this request as procedurally improper and because Plaintiff failed to provide any evidentiary support for any such findings of fact.

CERTIFICATE OF SERVICE

This is to certify that on the 26th day of August, 2026, I electronically transmitted the above document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Kaylen S. Lewis

lewis@joneslawfirm.com

I also certify that I served the following, who is not a registered participant of the ECF System for filing, via first class mail postage prepaid:

Jason M. Lynch

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Plaintiff, Pro Se

/s/ Alexandra G. Ah Loy

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DEFENDANTS.

**DEFENDANT TK HEALTH'S RESPONSES TO PLAINTIFF'S FIRST AND SECOND
LIMITED SETS OF DISCOVERY REQUESTS REGARDING EXHAUSTION AND
IDENTIFICATION OF DOE DEFENDANTS**

Defendant Turn Key Health Clinics, LLC, d/b/a TK Health, submits the following response to Plaintiff's First (served May 15, 2026) and Second (served June 8, 2026) Sets of Discovery Requests Regarding Exhaustion and Identification of Doe Defendants, as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Identify every correctional officer, sergeant, lieutenant, captain, booking officer, transport officer, control-room officer, segregation officer, and shift supervisor who had any interaction, contact, supervision, or involvement with Plaintiff during the Relevant Time Period. For each individual identified, provide:

- (i) Full legal name;
- (ii) Badge number or employee identification numbers;
- (iii) Rank/title;
- (iv) Employer;
- (v) Last known business address;

- (vi) Dates of employment;
- (vii) Shift assignments;
- (viii) Assigned housing units; and
- (ix) Specific involvement with Plaintiff.

RESPONSE: Defendant is not the custodian of the requested county records.

INTERROGATORY NO. 2: Identify every nurse, physician, nurse practitioner, medical assistant, pill-call officer, medical supervisor, and medical contractor who:

- (i) Dispensed medication to plaintiff;
- (ii) Withheld medication from Plaintiff;
- (iii) Altered Plaintiff's medication schedule;
- (iv) Responded to Plaintiff's medical complaints;
- (v) Reviewed Plaintiff's medical grievances; or
- (vi) Participated in decisions concerning Plaintiff's medical care.

For each person identified, provide: (a) full legal name; (b) professional title; (c) employer; (d) dates worked at White County Detention Center; (e) shift assignments; and (f) nature of involvement with Plaintiff.

RESPONSE: Defendant objects to this request as being overly broad in that it is not reasonably limited in time or scope. For example, the identity of every potential medical personnel and their supervisors is not reasonably calculated to identify the Doe Defendants based on the allegations within Plaintiff's complaints. Nor are the dates of their employment, their employer, or their shift assignments relevant or probative to the limited discovery permitted at this point, which is narrowly tailored to the issues of exhaustion and identification of Doe Defendants. Defendant further objects to this request as being unduly burdensome, as it would require Defendant to expend

considerable time and resources to identify information that is available to Plaintiff.

To that end, and subject to these objections, please see the medical records produced as Bates Nos.¹ TKH 0001-0074, which contain all of Plaintiff's medical records from TK Health at White County Detention Center during the care at issue.

More specifically, Defendant further responds as follows: personnel who "dispensed medication to plaintiff" can be identified on Bates Nos. TKH 0012-0015 and 0038-0041. Defendant is not aware of any medical personnel who "withheld medication from Plaintiff," but any such information would be contained within the medical records produced. Any changes to Plaintiff's medications would be reflected in the medical records, likely at TKH 0010-0012, 0033, 0038-0041, 0043, 0048, and 0073-0074. Medical personnel who "responded to Plaintiff's medical complaints" are identified within the complete medical records, including at Bates Nos. TKH 0004-0010, 0033, 0042, 0044-46, and 0047. Defendant is not the custodian of grievance records and therefore cannot identify who would have "reviewed Plaintiff's medical grievances." That information is within the custody of the County. Individuals who "participated in decisions concerning Plaintiff's medical care" is contained within the medical records produced.

INTERROGATORY NO. 3: Identify all individuals responsible for:

- (i) Reviewing inmate grievances;
- (ii) Reviewing grievance appeals;
- (iii) Operating Smart Communications systems;
- (iv) Maintaining grievance databases;
- (v) Preserving surveillance footage; and

¹ "Bates Nos." are the numbers stamped at the bottom righthand corner of the produced records. Defendant will reference these numbers throughout its responses to assist Plaintiff in identifying the requested information within those records.

- (vi) Supervising Plaintiff's housing assignments.

RESPONSE: Defendant is not the custodian of the County grievance system or grievance records. Such information is within the custody of the County.

INTERROGATORY NO. 4: Identify every individual present during any incident involving:

- (i) Plaintiff's requests for medical treatment;
- (ii) Pill call or medication distribution;
- (iii) Denial of medical treatment;
- (iv) Use of segregation or restricted housing;
- (v) Retaliatory actions;
- (vi) Legal mail handling; or
- (vii) Plaintiff's grievances and complaints.

RESPONSE: Defendant objects to this request as being unduly burdensome, as it would require Defendant to expend considerable time and resources to identify information that is available to Plaintiff. To that end, and subject to this objection, please see the medical records produced as Bates Nos. TKH 0001-0074, which contain all of Plaintiff's medical records from TK Health at White County Detention Center during the care at issue. The requested information, to the extent it is within TK Health's custody, is contained within those records. Defendant is not the custodian of the County grievance system or grievance records. Defendant is not involved in legal mail handling or "use of segregation or restricted housing," as those are detention functions. Such information is within the custody of the County. Defendant denies that it ever denied Plaintiff medical treatment or engaged in retaliatory conduct toward Plaintiff.

INTERROGATORY NO. 5 [June 8, 2026 Interrogatory No. 4]: Identify every official

who reviewed, denied, ignored, screened, rejected, or responded to grievances or appeals submitted by Plaintiff. For each official, state: (a) full name; (b) position; (c) employer; (d) dates of involvement; and (e) basis for each denial or rejection.

RESPONSE: Defendant is not the custodian of the County grievance system or grievance records. Such information is within the custody of the County.

REQUESTS FOR PRODUCTION

REQUEST NO. 1: IDENTIFICATION OF ALL DOE DEFENDANTS. Produce all documents sufficient to identify every staff member, officer, nurse, supervisor, contractor, medical provider, grievance officer, and employee who interacted with Plaintiff during the relevant time frame. This includes:

- (i) Full legal name;
- (ii) Rank and title;
- (iii) Employer;
- (iv) Shift assigned;
- (v) Dates worked;
- (vi) Assigned pod or housing unit;
- (vii) Job duties;
- (viii) Supervisory role;
- (ix) Medical role;
- (x) Pill call responsibilities;
- (xi) Grievance responsibilities;
- (xii) Court transport responsibilities.

RESPONSE: Defendant objects to this Request as being overly broad as to time and scope and

unduly burdensome as it seeks to require Defendant to comb through all of Plaintiff's medical records for a four-month period of time to identify individuals who had no involvement in Plaintiff's care or relationship to the medical decision-making involved in Plaintiff's care.

Subject to these objections, Defendant has produced Plaintiff's medical records from the White County Detention Center, which contain all medical staff known to have interacted with Plaintiff during his incarceration at the White County Detention Center. See the documents produced as Bates Nos. TKH 0001-0074.

REQUEST NO. 2: ALL DUTY ROSTERS. Produce all duty rosters, shift schedules, staffing assignments, pod assignments, post assignments, and medical staffing schedules for:

- (i) F Pod;
- (ii) Medical lockdown;
- (iii) PM pill call;
- (iv) Intake;
- (v) Segregation;
- (vi) Court transport;
- (vii) Court security/bailiff assignments.

RESPONSE: Defendant has produced its personnel time records for the White County Detention Center June 1, 2024 to September 30, 2024, as Bates Nos. TKH 0075-0083. Defendant does not maintain records in a manner that would be able to identify who was present on specific pods. The medical records produced herein will reflect who was involved in Plaintiff's medication pass and who conducted Plaintiff's medical intake. Defendant is not involved with court transport, segregation, or court security/bailiff assignments; those records, if they exist, would be within the custody of the County.

REQUEST NO. 3: IDENTIFICATION OF “NURSE F.” Produce all documents sufficient to identify the individual referred to as “Nurse F.”

RESPONSE: Defendant has produced Plaintiff’s medical records from the White County Detention Center, which contain all of the medical staff known to have interacted with Plaintiff during his incarceration at the White County Detention Center. If Plaintiff has difficulty reading any of the names of the personnel identified within his records, Defendant asks that Plaintiff contact counsel with the specific pages he needs assistance with. Defendant has also produced the timesheet records indicating the medical personnel on shift at the White County Detention Center between June 1, 2024 to October 1, 2024. To Defendant’s best information and belief, “F. Nurse” represents the “Float Nurse” on shift at the date and time indicated in the Sick Call responses. Defendant has produced time records (Bates Nos. TKH 0075-0083) which indicate who the float nurses were on staff during Plaintiff’s incarceration at the White County Detention Center. Specific to Plaintiff’s two Medical Requests on June 11, 2024 and on July 6, 2024, Defendant believes the float nurse would have been: Savannah Henderson, LPN for the June 11, 2024 Request; and, for the July 6, 2024 Request, either: Heather Jones, LPN, Katlyn Ladd, LPN, or Ashley Watt, LPN.

REQUEST NO. 4: IDENTIFICATION OF ALL PM PILL NURSES. Produce the identities of all PM pill nurses working during the relevant time frame, including:

- (i) Full names;
- (ii) Dates worked;
- (iii) Shift hours;
- (iv) Medication assignment logs;
- (v) Medication cart assignments.

RESPONSE: Defendant does not maintain records in a manner that would identify

“medication assignment logs” or “medication cart assignments.” The remainder of the requested information is contained within the produced medical records and time records.

REQUEST NO. 5: SHERIFF IDENTIFICATION. Produce documents identifying the Sheriff of White County during 2024, including supervisory authority over detention operations.

RESPONSE: Defendant is not the custodian of County records and defers to the County to provide the appropriate response to this Request.

REQUEST NO. 6: COURT DOCKET CONTROL AND COURTROOM ASSIGNMENTS. Produce documents sufficient to identify:

- (i) Who controlled inmate court-call scheduling;
- (ii) Who determined inmate courtroom order;
- (iii) Who controlled transport scheduling;
- (iv) Who directed Plaintiff to be called first before all pods and inmates;
- (v) Who made the decision to make Plaintiff’s wife wait until the final matter in the courtroom;
- (vi) Any communications or directives regarding such scheduling decisions.

RESPONSE: Defendant has no involvement in court docket control or courtroom assignments. Therefore, Defendant has no information responsive to this request.

REQUEST NO. 7: ALL GRIEVANCES AND REQUESTS. Produce all grievances, inmate requests, medical requests, appeals, responses, denials, routing logs, and related records submitted by Plaintiff during the relevant time frame. This includes all records concerning:

- (i) Medical needs;
- (ii) HIV medication;
- (iii) Pill call;

- (iv) Conditions of confinement;
- (v) Religious issues;
- (vi) Staff misconduct;
- (vii) Retaliation;
- (viii) Legal mail;
- (ix) Medical lockdown;
- (x) Housing;
- (xi) Access to Courts.

Plaintiff specifically requests the records in native format with: tracking numbers; timestamps; response dates; appeal dates; staff identifiers; routing history.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records. Any responsive information, to the extent TK Health is in possession of the same, is contained within the produced medical records.

REQUEST NO. 8: GRIEVANCE POLICIES. Produce all grievance policies, inmate handbook provisions, appeal procedures, timelines, and directives governing inmate grievances during the relevant period.

RESPONSE: Defendant is not the custodian of County grievance policies, procedures, or inmate handbooks. See the produced TK Health policy J-34 Grievance Process for Healthcare Complaints, produced as Bates Nos. TKH 0084-0085.

REQUEST NO. 9: GRIEVANCE LOGS. Produce all grievance tracking logs, kiosk logs, appeal logs, rejection logs, and grievance database entries related to Plaintiff.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records.

REQUEST NO. 10: COMMUNICATION RECORDS. Produce all inmate-to-staff communications submitted by Plaintiff relating to:

- (i) Medication;
- (ii) Medical care;
- (iii) Conditions of confinement;
- (iv) Staff conduct;
- (v) Retaliation;
- (vi) Legal mail;
- (vii) Religious practices.

RESPONSE: Defendant is not the custodian of inmate communications at the White County Detention Center, and the County would be the appropriate custodian of such records. To the extent Defendant is in possession of any such communications, they are contained within the medical records produced.

REQUEST NO. 11 [June 8, 2026 Request No. 1]: Produce all duty rosters, staffing schedules, shift logs, pod assignment sheets, overtime records, housing assignment records, and employee sign-in sheets for the Relevant Time Period.

RESPONSE: See the produced time records.

REQUEST NO. 12 [June 8, 2026 Request No. 5]: Produce all Smart Communications records, kiosk communications, inmate requests, electronic grievances, request-to-staff forms, electronic messages, and associated metadata submitted by Plaintiff.

RESPONSE: Defendant is not the custodian of inmate communications at the White County Detention Center, and the County would be the appropriate custodian of such records. To the extent Defendant is in possession of any such communications, they are contained within the

medical records produced.

REQUEST NO. 13 [June 8, 2026 Request No. 6]: Produce the complete grievance policy, inmate handbook, medical grievance procedures, appeal procedures, and all revisions in effect during the Relevant Time Period.

RESPONSE: Defendant is not the custodian of County grievance policies, procedures, or inmate handbooks. See the produced TK Health policy J-34 Grievance Process for Healthcare Complaints, produced as Bates Nos. TKH 0084-0085.

REQUEST NO. 14 [June 8, 2026 Request No. 7]: Produce all grievances, requests to staff, medical requests, appeals, kiosk submissions, informal complaints, emergency grievances, and related responses submitted by Plaintiff during the Relevant Time Period.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records.

REQUEST NO. 15 [June 8, 2026 Request No. 8]: Produce all grievance tracking logs, grievance indexes, grievance databases, grievance spreadsheets, and grievance audit trails related to Plaintiff.

RESPONSE: Defendant is not the records custodian for County grievances, and the County would be the appropriate custodian of such records.

REQUEST NO. 16 [June 8, 2026 Request No. 9]: Produce all policies, training materials, directives, memoranda, emails, or communications concerning:

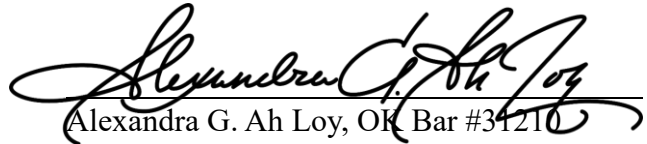
- (i) Handling inmate grievances;
- (ii) Preservation of grievances;
- (iii) Deletion of grievances;
- (iv) Exhaustion under the PLRA;

- (v) Litigation holds;
- (vi) Legal mail; or
- (vii) Retaliation against inmates for filing grievances or lawsuits.

RESPONSE: Defendant is not the custodian of County policies or procedures related to grievances, PRLA, legal mail, or retaliation. See the produced TK Health policy J-34 Grievance Process for Healthcare Complaints, produced as Bates Nos. TKH 0084-0085.

REQUEST NO. 16 [June 8, 2026 Request No. 11]: Produce all litigation hold notices, preservation directives, or communications relating to Plaintiff or this litigation.

RESPONSE: Defendant objects to this Request as exceeding the scope of discovery permitted under the current Court orders, which is narrowly tailored to the issues of exhaustion and identification of Doe Defendants.



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*Attorneys for Defendants Turn Key Health
Clinics, LLC, and Kaitlyn Smith, and
Ashley Watts*

CERTIFICATE OF SERVICE

This is to certify that on the 9th day of July, 2026, I electronically transmitted the above document via e-mail to the following:

Kaylen S. Lewis lewis@joneslawfirm.com

I also certify that I served the following, who is not a registered participant of the ECF System for filing, via first class mail postage prepaid:

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Plaintiff, Pro Se

A handwritten signature in black ink, appearing to read "Alexandra C. H. Lopez", written over a horizontal line.