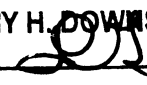


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

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

MAY 26 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

SUBJECT: RE: First additional supplemental Claim
DATE: 05/17/2026 11:36:01 PM

2026 MAY 26 A 10:04

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

JASON MATTHEW LYNCH
Plaintiff,

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

DOES, et al.
Defendants.

PLAINTIFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL CLAIM AND SUPPLEMENTAL PLEADING PURSUANT TO
FED. R. CIV. P. 15(d)

COMES NOW Plaintiff, Jason Matthew Lynch ("Mr. Lynch" or "Plaintiff"), appearing pro se, and respectfully moves this Honorable Court for leave to file a supplemental pleading and supplemental claim pursuant to Federal Rule of Civil Procedure 15(d), and in support thereof states as follows:

I. INTRODUCTION

1. Plaintiff respectfully requests leave of Court to supplement his already-pleaded claims under 42 U.S.C. §§ 1983 and 1985 in the above-captioned matter.
2. Plaintiff does not seek to completely rewrite or replace his currently operative Third Amended Complaint ("TAC"), nor does Plaintiff seek to restart this litigation or substantially alter the procedural posture of this case.
3. Rather, Plaintiff seeks only to add a newly discovered supplemental claim arising from the same continuing course of conduct, conspiracy, retaliation, deprivation of civil rights, and abuse of governmental authority already alleged throughout this litigation.
4. Specifically, Plaintiff has only recently learned facts indicating that while he was confined at the White County Detention Center from approximately June 9, 2024 through September 9, 2024, White County officials and/or the White County Sheriff failed and refused to transport Plaintiff to critical civil court proceedings in Oak Meadow Farms LLC v. Jason Lynch, resulting in a default judgment and the loss of more than \$75,000.00 in personal property and possessory interests.
5. Plaintiff alleges that these actions constitute additional violations of Plaintiff's rights under the United States Constitution and further support Plaintiff's already-pending conspiracy claims under 42 U.S.C. § 1985.
6. Plaintiff respectfully submits that judicial economy, fairness, and the interests of justice strongly favor allowing supplementation of the present action rather than forcing Plaintiff to initiate an entirely separate federal lawsuit concerning

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

substantially overlapping parties, facts, policies, customs, and conspiratorial conduct.

II. LEGAL STANDARD

7. Federal Rule of Civil Procedure 15(d) provides:

> "On motion and reasonable notice, the court may, on just terms, permit a party to serve a supplemental pleading setting out any transaction, occurrence, or event that happened after the date of the pleading to be supplemented."

8. Rule 15 is to be liberally construed in favor of permitting amendments and supplemental pleadings when justice so requires. *Foman v. Davis*, 371 U.S. 178, 182 (1962).

9. The United States Court of Appeals for the Eighth Circuit has repeatedly recognized that leave to amend or supplement should generally be freely granted absent undue delay, bad faith, repeated failure to cure deficiencies, or undue prejudice. *Dennis v. Dillard Dep't Stores, Inc.*, 207 F.3d 523, 525 (8th Cir. 2000).

10. Supplemental pleadings are especially appropriate where they promote judicial economy and involve related conduct arising from the same general series of events already before the Court.

11. Plaintiff respectfully submits that the proposed supplemental claim satisfies these standards.

III. FACTUAL BASIS FOR SUPPLEMENTAL CLAIM

12. Plaintiff was arrested and confined within the White County Detention Center from approximately June 9, 2024 through September 9, 2024.

13. During this confinement period, there were major civil proceedings occurring in *Oak Meadow Farms LLC v. Jason Lynch*, a civil action in which Plaintiff was the named defendant.

14. Plaintiff has recently learned that while he remained in the custody and control of White County officials, Plaintiff was not transported to at least two critical civil court proceedings in White County.

15. Plaintiff alleges that these failures to transport resulted in severe prejudice, including the entry of a default judgment and the loss of more than \$75,000.00 in personal property and related interests.

16. Plaintiff had no ability to transport himself, appear independently, or otherwise secure his physical presence before the court because he was entirely under the custody and control of White County authorities.

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

17. Plaintiff alleges that the White County Sheriff's Office and White County Detention Center had actual or constructive knowledge of Plaintiff's pending court dates.

18. Plaintiff further alleges that the relevant court proceedings occurred within White County itself, in the same county in which Plaintiff was being detained.

19. Plaintiff alleges there is no reasonable explanation why White County officials would not have known Plaintiff had scheduled proceedings in White County courts while simultaneously being held in White County custody.

20. Plaintiff further alleges that either:

(a) White County officials intentionally refused to transport Plaintiff; or

(b) White County officials acted with deliberate indifference and gross negligence concerning Plaintiff's constitutional rights and access to the courts.

21. In either circumstance, Plaintiff alleges that he suffered substantial constitutional injury and deprivation of property without due process of law.

IV. FEDERAL CONSTITUTIONAL AND STATUTORY VIOLATIONS

22. Plaintiff alleges violations of the Fourteenth Amendment to the United States Constitution, including deprivation of property without due process of law.

23. The United States Supreme Court has long recognized that meaningful access to courts is a fundamental constitutional right. *Bounds v. Smith*, 430 U.S. 817 (1977).

24. Government officials may not interfere with a detainee's ability to defend legal actions affecting property interests and civil rights.

25. Plaintiff further alleges violations actionable under 42 U.S.C. § 1983 because White County officials, acting under color of state law, deprived Plaintiff of federally protected constitutional rights.

26. Plaintiff further alleges that the newly discovered facts support and strengthen Plaintiff's already-pending conspiracy allegations under 42 U.S.C. § 1985.

27. Plaintiff alleges that White County officials acted in concert and with reckless disregard for Plaintiff's constitutional rights by failing to secure Plaintiff's appearance at critical proceedings while simultaneously exercising total physical custody and control over him.

28. Plaintiff further notes that White County officials later sought custody and transport of Plaintiff from federal prison

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

proceedings in civil litigation where Plaintiff himself was the plaintiff and White County was the defendant.

29. Plaintiff respectfully submits that this contrast is highly relevant and probative.

30. Plaintiff alleges that when Plaintiff was a defendant in civil litigation and stood to lose substantial property rights, White County failed to secure Plaintiff's appearance before the court.

31. Yet when White County later faced civil liability exposure as defendants in litigation initiated by Plaintiff, White County actively pursued Plaintiff's transport and physical appearance.

32. Plaintiff respectfully submits that these facts support a reasonable inference of selective treatment, retaliatory motive, deliberate indifference, and conspiratorial conduct relevant to Plaintiff's existing § 1985 claims.

33. Plaintiff further alleges that command staff, supervisory personnel, and/or policymakers within White County Detention Center reasonably knew or should have known of Plaintiff's pending court proceedings.

34. Plaintiff further alleges that their failure to act deprived Plaintiff of procedural due process and meaningful access to judicial proceedings.

V. ARKANSAS LAW AND DUTIES OF THE SHERIFF

35. Under Arkansas law, sheriffs are charged with duties relating to the custody, transport, and production of detainees before courts.

36. Arkansas law recognizes the sheriff as the chief law enforcement officer of the county with responsibility for execution of lawful court process and custody obligations. See Ark. Code Ann. §§ 12-41-502 and 14-14-1301.

37. Plaintiff alleges that White County officials had a duty to reasonably ensure Plaintiff's presence before the court while he remained entirely within county custody.

38. Plaintiff further alleges that failure to secure Plaintiff's attendance at known proceedings violated duties imposed by Arkansas law and deprived Plaintiff of the opportunity to defend against civil claims affecting substantial property interests.

39. Plaintiff further alleges that these failures constituted negligence, deliberate indifference, abuse of governmental authority, and deprivation of constitutional protections.

VI. SUPPLEMENTATION PROMOTES JUDICIAL ECONOMY

40. Plaintiff respectfully submits that supplementation is preferable to filing a wholly separate federal action.

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

41. The existing litigation already involves:

White County officials;

alleged conspiratorial conduct;

§ 1983 claims;

§ 1985 conspiracy claims;

customs, policies, and practices of White County;

alleged retaliation and deprivation of constitutional rights.

42. The proposed supplemental claim substantially overlaps with the facts, parties, and constitutional issues already before this Court.

43. Requiring Plaintiff to initiate a separate lawsuit would create unnecessary duplication of litigation, duplicate discovery, increased judicial burden, and potentially inconsistent rulings.

44. Plaintiff respectfully states that if the Court determines supplementation would improperly delay or restart the present litigation, Plaintiff may seek leave to file a separate action; however, Plaintiff respectfully requests that the Court first consider allowing supplementation in the interest of judicial economy and fairness.

VII. RELIEF SOUGHT

45. Plaintiff seeks all relief available under federal and state law, including but not limited to:

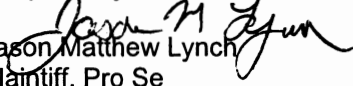
- a. Leave to file a supplemental pleading and supplemental claim;
- b. Compensatory damages for the loss of property and related damages exceeding \$75,000.00;
- c. Damages for emotional distress, humiliation, and constitutional injury;
- d. Punitive damages against individual defendants for reckless or intentional violations of constitutional rights;
- e. Declaratory relief;
- f. Costs and any recoverable fees allowable by law;
- g. Any additional relief the Court deems just and proper.

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

VIII. CONCLUSION

WHEREFORE, Plaintiff respectfully requests that this Court grant leave pursuant to Federal Rule of Civil Procedure 15(d) allowing Plaintiff to supplement his already-pleaded claims under 42 U.S.C. §§ 1983 and 1985 to include the newly discovered supplemental claim arising from White County's failure and/or refusal to transport Plaintiff to critical civil proceedings while Plaintiff remained in White County custody.

Respectfully submitted,


Jason Matthew Lynch
Plaintiff, Pro Se
Reg. No. 07405-510

Date: 5-19-26