

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

SUBJECT: RE: Emergency Supporting Brief for Injunction
DATE: 04/12/2026 10:51:02 PM

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

Jason Matthew Lynch
Plaintiff, Pro Se

v.

White County, Arkansas, et al.
Defendants

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

APR 17 2026

TAMMY H. DOWNS, CLERK
By:  DEP. CLERK

4:24-CV-00740-LPR-BBM

EMERGENCY SUPPORTING BRIEF AND MEMORANDUM OF LAW

IN SUPPORT OF TEMPORARY PROTECTIVE ORDER (TPO) AND PRELIMINARY INJUNCTION

I. INTRODUCTION THIS IS AN EMERGENCY MATTER

Plaintiff, Jason Matthew Lynch, respectfully submits this Emergency Supporting Brief and Memorandum of Law in support of his request for a Temporary Protective Order (TPO) and Preliminary Injunction.

This matter is extraordinary and urgent.

Mr. Lynch faces an immediate and irreparable threat to his life, liberty, and constitutional rights due to:

A retaliatory civil writ issued in state court proceedings,

A "trial by surprise" scheduling order that bypasses fundamental procedural protections,

The risk of forced transfer back to White County Jail, where:

He was previously denied life-saving medication,

Subjected to retaliation,

Placed in medical lockdown,

And suffered serious constitutional violations now recognized by this Court as having merit.

Federal courts have already determined that Mr. Lynch's claims are sufficiently serious to proceed. Yet, despite this, state court actions now threaten to undo federal protections and expose him to renewed harm.

Absent immediate federal intervention, Mr. Lynch will suffer irreparable injury, including potential loss of life, medical harm, and destruction of his federal rights and claims.

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II. FACTUAL BACKGROUND

A. Federal Court Recognition of Serious Constitutional Violations

In *Lynch v. Does et al.*, No. 4:24-cv-00740 (E.D. Ark.), this Court allowed claims to proceed involving:

Inhumane conditions of confinement

Deliberate indifference to serious medical needs

Retaliation under 42 U.S.C. § 1983 and § 1985

Policy/custom liability (Monell)

These claims arise from events at White County Jail, where Mr. Lynch:

Was denied essential HIV medication (ART/Biktarvy)

Suffered prolonged deprivation of care (~100 days)

Was subjected to retaliatory treatment

Was placed in medical lockdown conditions

These facts are not speculative they are actively litigated federal claims that survived screening.

B. Retaliatory Civil Writ and State Court Abuse of Process

Mr. Lynch is now subject to a civil writ issued in White County Circuit Court (Case No. 73CV-26-287), which:

Seeks to return him to the same facility where harm occurred

Is tied to a civil tort action he himself filed

Operates in a manner that:

Interrupts his federal sentence

Jeopardizes his First Step Act credits

Prevents completion of RDAP (drug treatment program)

Threatens his imminent home confinement release

This writ is not neutral it is retaliatory in nature and effect, directly linked to Mr. Lynch's litigation against the same actors.

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C. "Trial by Surprise" Denial of Due Process

The state court has:

Set a trial date within ~30 days

Skipped service of process

Bypassed discovery entirely

Denied Defendants the opportunity to answer

Scheduled a pretrial hearing minutes before trial

This constitutes:

A complete breakdown of procedural due process

A violation of:

Arkansas Rules of Civil Procedure (Rules 4, 26, 33, 34)

Federal Due Process protections under the Fourteenth Amendment

This is trial by ambush, prohibited under both federal and state law.

III. LEGAL STANDARD FOR INJUNCTIVE RELIEF

A preliminary injunction is warranted when the movant demonstrates:

1. Likelihood of success on the merits
2. Irreparable harm absent relief
3. Balance of equities in his favor
4. Public interest supports relief

Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7 (2008)

IV. ARGUMENT

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IV. ARGUMENT

1. Likelihood of Success

Mr. Lynch has already established:

Viable claims under 42 U.S.C. § 1983

Retaliation claims under § 1985

Evidence supporting Monell liability

Federal courts have already allowed these claims to proceed this alone strongly supports likelihood of success.

2. Irreparable Harm

Mr. Lynch faces:

Risk of serious bodily harm or death

Loss of constitutional rights

Disruption of federal sentence and statutory benefits

> Loss of constitutional rights = irreparable harm (Elrod v. Burns, 427 U.S. 347)

3. Balance of Equities

Defendants: minimal burden (delay)

Plaintiff: life-threatening consequences

Balance overwhelmingly favors Mr. Lynch.

4. Public Interest

Public interest supports:

Protecting constitutional rights

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Preventing retaliatory government action

Preserving federal jurisdiction

V. FEDERAL AUTHORITY TO ISSUE INJUNCTION

This Court has authority under:

A. 28 U.S.C. § 1651 (All Writs Act)

To protect jurisdiction and prevent interference.

B. 28 U.S.C. § 2283 (Anti-Injunction Act Exceptions)

Permits injunctions:

In aid of jurisdiction

To protect federal judgments

C. Supremacy Clause

Federal rights override conflicting state actions.

VI. ADDITIONAL GROUNDS

Evidence is in Defendants' exclusive control

Risk of spoliation

Ongoing retaliation

Imminent release timeline (April 2026)

Severe prejudice if writ proceeds

VII. REQUEST FOR RELIEF

Mr. Lynch respectfully requests:

1. Immediate Temporary Protective Order (TPO) prohibiting:

Transfer to White County custody

Enforcement of the civil writ

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2. Preliminary Injunction:

Staying state court proceedings related to the writ

Preserving Plaintiff's federal rights

3. Order to Preserve Evidence

4. Any additional relief deemed just and proper

VIII. CONCLUSION

This is not a routine motion.

This is a case where:

A litigant with validated civil rights claims

Is being forced back into the custody of those he is suing

Through procedurally defective and retaliatory means

Absent intervention, the harm will be immediate, irreparable, and potentially fatal.

Respectfully submitted,
Jason Matthew Lynch
Plaintiff, Pro Se

PROPOSED ORDER

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

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

White County, Arkansas, et al.
Defendants

ORDER

Before the Court is Plaintiff's Emergency Motion for Temporary Protective Order and Preliminary Injunction.

Upon review, the Court finds:

Plaintiff has demonstrated a likelihood of success on the merits,

Plaintiff faces immediate and irreparable harm,

The balance of equities favors Plaintiff,

The public interest supports injunctive relief.

IT IS THEREFORE ORDERED:

1. Plaintiff's Motion is GRANTED.

2. A Temporary Protective Order is hereby ISSUED prohibiting:

Any transfer of Plaintiff to White County custody,

Enforcement of the civil writ issued in White County Circuit Court Case No. 73CV-26-287.

3. State court proceedings related to said writ are STAYED pending further order of this Court.

4. Defendants are ORDERED to preserve all evidence related to Plaintiff.

5. This Order shall remain in effect pending further proceedings.

IT IS SO ORDERED this ____ day of _____, 2026.

UNITED STATES DISTRICT JUDGE