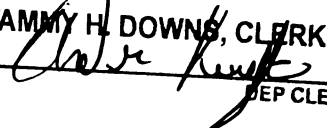


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

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

JUL 29 2026

TAMMY H. DOWNS, CLERK
By:  DEP. CLERK

JASON MATTHEW LYNCH 2026 JUL 29 A 9 51

Reg. No. 07405-510

TAMMY H. DOWNS

Plaintiff,

v.

DOES, PILL NURSES 1–3; CLAYTON
EDWARDS, et al.,

Defendants.

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

**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**

Plaintiff Jason Matthew Lynch, proceeding pro se, moves under Federal Rules of Civil Procedure 6(b), 21, 26(e), 33, 34, and 37, and Local Rule 7.2(g), for a narrow order completing the Doe-identification discovery already served, substituting three nurses identified in the produced medication records for Pill Nurses 1–3, and preserving enough time for service. This single filing is confined to the claims and parties that survived screening in this case.

I. PRECISE RELIEF REQUESTED

1. Order Defendant Turn Key Health Clinics, LLC d/b/a TK Health (“TK Health”) to serve, within fourteen days, a verified and event-specific supplemental response identifying the full legal name, title, employer, and specific role of each person who crushed, floated, dissolved, dispensed, or documented Plaintiff’s Biktarvy on the dates reflected at TKH 0014–0015, including Y’Kebiya Spinks, Savannah Henderson, and Jamie Andersen.
2. Require TK Health, after a reasonable inquiry of its EMR user-account information, personnel records, and persons with knowledge, to identify the exact user described as “F. Nurse” on

Medical Request #20,062,020 (June 12, 2024) and Medical Request #20,370,139 (July 8, 2024), instead of giving one name for the first entry and three alternatives for the second.

3. Require TK Health to identify the “Facility Provider” notified about crushing Biktarvy and the provider who directed that it be dissolved in water, and to identify the Healthway pharmacist consulted about crushing, by full name, credential, employer, and event-specific role. If “White, Jonathan” at TKH 0009 was one of those providers, the supplement should say so.
4. Require production, in native form if reasonably available, of Medical Request #20,062,020 and Medical Request #20,370,139 with the user identifier, routing history, timestamps, and other reasonably available metadata responsive to Requests for Production 7 and 12. If a requested field or record does not exist, TK Health should say so after a reasonable inquiry and identify the records searched.
5. Substitute Y’Kebiya Spinks, Savannah Henderson, and Jamie Andersen for Pill Nurses 1, 2, and 3, respectively, under Rule 21, limited to the already-screened individual-capacity crushed-medication claim. Alternatively, hold that request in abeyance until TK Health serves the ordered supplementation and permit Plaintiff to file a short substitution notice within thirty days afterward.
6. Treat this motion as timely compliance with the August 31, 2026 Doe-identification motion deadline; extend the deadline to correct the Doe substitutions until thirty days after complete supplementation; and extend service through sixty days after summonses issue. Plaintiff also requests Marshal service and sealed submission of last-known addresses because he proceeds in forma pauperis.
7. Acknowledge Plaintiff’s specific dispute concerning the signature and printed name on TKH 0045 and direct continued preservation of that document and its native source. Plaintiff does not ask the Court to find forgery, exclude evidence, or impose monetary sanctions in this motion.

II. RELEVANT PROCEDURAL HISTORY

8. The Third Amended Complaint (Doc. 45) remains the operative pleading. The January 13, 2026 screening Order (Doc. 80) permits, among other claims, an individual-capacity crushed-medication deliberate-indifference claim against Edwards, Spence, Watts, and Pill Nurses 1–3, and an official-capacity crushing-policy claim against Edwards and Turnkey. Doc. 80 at 2–3.
9. This motion does not seek to revive any severed or dismissed claim, add every person on a staffing roster, add Nurse F as a defendant, or add correctional personnel from other cases. It seeks only event-specific identification relevant to the surviving medical claims and substitution of the three remaining Pill-Nurse Does.
10. The current schedule requires a motion identifying the Doe Defendants by August 31, 2026, service of the Doe Defendants by October 13, 2026, and completion of discovery by December 1, 2026. Plaintiff sought the information well before those dates.
11. Plaintiff served a first limited discovery set on May 15, 2026 and a second set on June 8, 2026. TK Health served a consolidated response on July 9, 2026. Ex. A at 1.

III. THE RESPONSE DID NOT COMPLETE DOE IDENTIFICATION

12. Interrogatory 2 requested, for each medical person who dispensed, withheld, altered, responded to complaints about, or participated in decisions concerning Plaintiff’s medical care, the person’s full name, title, employer, dates and shifts worked, and nature of involvement. TK Health objected, then referred Plaintiff to broad Bates ranges and stated that the requested identities were “contained within” the records. Ex. A at 2–3.
13. Request for Production 1 sought documents sufficient to identify staff and medical providers who interacted with Plaintiff, including their medical role and pill-call responsibilities. TK Health again referred generally to TKH 0001–0074. Ex. A at 5–6. Request 4 sought the PM pill

nurses, their dates and hours, and medication assignments. TK Health said it did not maintain cart-assignment records and referred to medical and time records. *Id.* at 7–8.

14. The records identify who entered “Received” on particular dates, but they do not state who physically crushed, floated, or dissolved the medication; who directed the practice; or whether the EMR user was the person who handed the medication to Plaintiff. The information still needed is discrete:

Date / record	Name shown	Identification still required
Aug. 23–25, 2024 TKH 0014	Y’Kebiya Spinks	Whether she personally crushed, floated, dissolved, dispensed, or documented Biktarvy; her title, employer, and event-specific role.
Aug. 30–Sept. 1, 2024 TKH 0014	Savannah Henderson	The same event-specific information; and whether she authored the June 12 “F. Nurse” response.
Sept. 2–3 & 6–8, 2024 TKH 0014–0015	Jamie Andersen	The same event-specific information for each listed medication pass.
Aug. 15 & 28, 2024 TKH 0033	“Facility Provider” and pharmacist not named	Full identity, credential, employer, and role in approving or advising crushing, floating, or dissolution.
June 12 & July 8, 2024 TKH 0042, 0047	“F. Nurse”	The exact user for each response after a reasonable inquiry—not a list of alternatives.

15. Request 3 specifically sought documents sufficient to identify “Nurse F.” TK Health answered that the label likely meant a float nurse; identified Henderson for the June request; and gave Jones, Ladd, or Watt as alternatives for the July request. *Ex. A* at 7. A list of three possible users does not identify the author of that entry.

16. TKH 0033 states that jail administrative staff directed all medications to be crushed and floated, that a Healthway pharmacist was contacted, that a “Facility Provider” was notified, and that later dissolution was allowed “per provider.” TKH 0009 attributes an August 23 dissolution instruction to “White, Jonathan.” TKH 0036 shows that Ashley Watt created a “CRUSH MEDICATION” alert on August 15 and Kaitlyn Smith removed and recreated it on September 6. Ex. C. Those records reveal roles, but not all identities and relationships asked for in Interrogatory 2.
17. The medication history attributes Biktarvy entries on August 23–25 to Spinks, on August 30 through September 1 to Henderson, and on September 2–3 and 6–8 to Andersen. Ex. D (TKH 0014–0015). Plaintiff declares from personal knowledge that the challenged crushing/floating/dissolution practice continued during those dates and that he objected to it. Lynch Decl. ¶¶ 7–8.

IV. GOOD-FAITH CONFERENCE CERTIFICATION

18. On July 19, 2026, Plaintiff sent written good-faith correspondence to Kaylen S. Lewis, counsel for the County Defendants, and Alexandra G. Ah Loy, counsel for the Medical Defendants. The correspondence identified the specific unresolved issues: event-specific identification of Pill Nurses 1–3, the two “F. Nurse” entries, the unnamed provider and pharmacist, and native user-identification data. Plaintiff requested complete supplementation by August 3, 2026. As of the date Plaintiff signs and files this motion, the specific issues stated above remain unresolved. The parties therefore have been unable to resolve them without Court intervention.
19. Paragraph 18 is Plaintiff’s certification under Rule 37(a)(1) and Local Rule 7.2(g). If any requested supplementation is received before filing, Plaintiff will narrow this motion to omit any resolved issue.

V. ARGUMENT

A. The event-specific supplementation is required by Rules 33 and 37.

20. Rule 33 requires each interrogatory to be answered separately and fully under oath. Fed. R. Civ.

P. 33(b)(3). When a party elects to answer by reference to business records, Rule 33(d) applies only if the burden of deriving the answer is substantially the same for either party and the response specifies the records in enough detail to permit the requesting party to locate and identify them as readily as the responding party can.

21. The burdens are not substantially equal here. TK Health controls the EMR user accounts, personnel and credential information, and employees who can explain who used “F. Nurse,” who was the “Facility Provider,” and whether the MAR user physically administered the medication. Plaintiff has static printouts. A broad reference to 74 medical-record pages and nine time-record pages cannot answer the event-specific portions of Interrogatory 2 or identify the author of the two specified requests.

22. Rule 37(a)(3)(B)(iii) authorizes an order compelling an interrogatory answer, and an evasive or incomplete answer is treated as a failure to answer. Fed. R. Civ. P. 37(a)(4). The requested order requires only a reasonable inquiry and a verified answer. If, after that inquiry, TK Health cannot determine an identity, it can explain the search performed and why the information cannot be determined.

B. The native request records are responsive to the requests already served.

23. Requests for Production 7 and 12 sought medical and kiosk requests in native format with timestamps, staff identifiers, routing history, and associated metadata. Ex. A at 8. The two identified “F. Nurse” records were produced as static images. Rule 34(b)(2)(B)–(C) requires an item-by-item response and disclosure whether responsive materials are being withheld. Rule 37(a)(3)(B)(iv) authorizes an order compelling production. The request in this motion is limited to two numbered records and their reasonably available user-identification fields.

C. The discovery is relevant, proportional, and requires supplementation.

24. The Court kept Pill Nurses 1–3 in the case and set a deadline for identifying them. The identities and roles of nurses associated with the medication passes, and the persons who directed the crushing policy, go to the surviving claims. The request is limited to specific dates, records, and users and is proportional under Rule 26(b)(1).
25. Rule 26(e)(1)(A) requires timely supplementation when a discovery response is materially incomplete or incorrect and the corrective information has not otherwise been made known during discovery. The MAR names did not make known who performed the challenged physical acts, and “either Jones, Ladd, or Watt” did not make known the July 8 user. A verified supplement is therefore appropriate.

D. Rule 21 permits substitution of the three record-identified nurses.

26. Rule 21 permits the Court, on motion and on just terms, to add a party at any time. The Eighth Circuit has cautioned against dismissing an unnamed defendant when the complaint states a claim and the identity can be learned through discovery or Court intervention. *Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985). Here, the claim against Pill Nurses 1–3 has already survived screening, and the produced records now supply three names tied to the challenged medication period.
27. Substitution would not revive a dismissed claim or alter the claim’s nature. It would replace placeholders with Y’Kebiya Spinks, Savannah Henderson, and Jamie Andersen, in sequence, for the existing individual-capacity crushed-medication claim. If the Court finds the present record insufficient to assign the Doe numbers, it should hold substitution in abeyance, compel the precise identification, and allow a short notice afterward rather than deny the request outright.

E. Good cause supports a limited extension and Marshal service.

28. Plaintiff served identification discovery in May and June, followed up in July, and moved before the identification deadline. Because the remaining information is held by Defendants, good cause supports the limited extensions under Rule 6(b)(1)(A).

29. Because Plaintiff proceeds in forma pauperis, the Clerk should issue summonses and the United States Marshal should serve any substituted defendants. 28 U.S.C. § 1915(d); Fed. R. Civ. P. 4(c)(3). Counsel may submit last-known addresses under seal, as in Doc. 169.

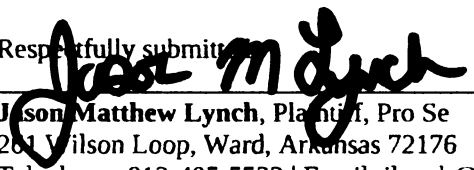
F. The authenticity issue should be preserved, not adjudicated now.

30. Plaintiff disputes the signature and printed name on TKH 0045 and offers the signature on TKH 0073 only for comparison. Ex. E; Lynch Decl. ¶ 9. He does not seek a forgery or admissibility ruling; he asks only that the dispute be recorded and the source preserved under Doc. 169.

VI. CONCLUSION

For these reasons, Plaintiff requests the relief stated in Section I and any other just relief. He does not request expenses or fees under Rule 37(a)(5).

Respectfully submitted,


Jason Matthew Lynch, Plaintiff, Pro Se
261 Wilson Loop, Ward, Arkansas 72176
Telephone: 812-405-5532 | Email: jlynch@abtechcs.com
Date: 7.28.26
28

**DECLARATION OF JASON MATTHEW LYNCH
UNDER 28 U.S.C. § 1746**

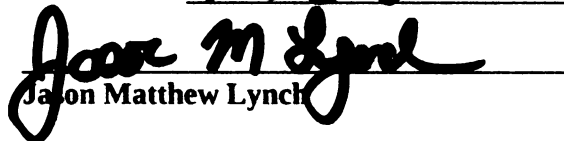
I, Jason Matthew Lynch, declare as follows:

1. I am the Plaintiff in this case and make this declaration from personal knowledge, except where I identify a produced record.
2. I was confined at the White County Detention Center during the relevant period in 2024 and was prescribed Biktarvy, which I understood was to be taken whole as prescribed.
3. I served my first limited discovery requests on May 15, 2026 and my second limited discovery requests on June 8, 2026.
4. I received TK Health's consolidated responses dated and served July 9, 2026.
5. On July 19, 2026, I sent written good-faith correspondence to Kaylen S. Lewis and Alexandra G. Ah Loy identifying the specific incomplete answers described in this motion and requesting complete supplementation by August 3, 2026.
6. As of the date I sign this declaration, I have not received a complete, verified, event-specific supplemental response resolving those issues.
7. Beginning in late July 2024 and continuing into September 2024, I repeatedly objected when my Biktarvy was crushed, floated, dissolved, or presented in an altered form. The challenged practice continued on the medication-pass dates described in the motion.
8. The records produced by TK Health attribute Biktarvy entries on August 23–25, 2024 to Y'Kebiya Spinks; on August 30–September 1, 2024 to Savannah Henderson; and on September 2–3 and 6–8, 2024 to Jamie Andersen. Those records do not tell me whether each EMR user was the person who physically altered and handed me the medication.
9. The signature and printed name on TKH 0045 are not my signature or handwriting. I recognize the signature on TKH 0073 as mine, although I maintain that I signed that document under

pressure. I raise the comparison to preserve a specific authenticity issue, not to ask the Court to decide forgery in this motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7-28-26, 2026


Jason Matthew Lynch

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

JASON MATTHEW LYNCH

Reg. No. 07405-510

Plaintiff,

v.

**DOES, PILL NURSES 1–3; CLAYTON
EDWARDS, et al.,**

Defendants.

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

PROPOSED ORDER

PROPOSED ORDER

Before the Court is Plaintiff’s Consolidated Motion to Compel Complete Doe-Identification Responses, to Substitute Identified Pill-Nurse Defendants, and for a Limited Extension of Time. For good cause, the Motion is GRANTED IN PART as follows:

1. Within fourteen (14) days, Defendant TK Health shall serve a verified supplemental response that, after a reasonable inquiry, provides the full name, title, employer, and event-specific role of: (a) each person who crushed, floated, dissolved, dispensed, or documented Plaintiff’s Biktarvy on the dates at TKH 0014–0015; (b) the exact user of “F. Nurse” on Medical Request #20,062,020 and Medical Request #20,370,139; (c) the “Facility Provider” notified on August 15, 2024 and the provider who directed dissolution; and (d) the Healthway pharmacist consulted about crushing.
2. Within fourteen (14) days, TK Health shall produce the two numbered Medical Requests in native form, if reasonably available, with reasonably available user identifiers, routing history, timestamps, and metadata. If responsive information does not exist or cannot be determined after reasonable inquiry, the verified supplement shall identify the search performed and state that result.

3. Y'Kebiya Spinks, Savannah Henderson, and Jamie Andersen are substituted for Pill Nurses 1, 2, and 3, respectively, under Rule 21, limited to the individual-capacity crushed-medication claim already allowed to proceed. If TK Health's supplement shows a different event-specific mapping, Plaintiff may file a concise correction within thirty (30) days after service of the supplement.
4. Counsel for TK Health shall submit the substituted Defendants' last-known addresses under seal within fourteen (14) days. The Clerk is directed to prepare summonses, and the United States Marshal is directed to serve each substituted Defendant. Plaintiff's service deadline is extended through sixty (60) days after the Marshal receives the summonses.
5. This Motion satisfies the August 31, 2026 Doe-identification motion deadline. Plaintiff may seek a corrected substitution within thirty (30) days after complete supplementation.
6. Defendants shall continue to preserve the original and native source of TKH 0045 and the specific EMR, MAR, request, alert, and note records identified in this Motion, consistent with the Court's prior preservation directive. No authenticity finding is made.
7. No expenses, fees, or monetary sanctions are awarded.

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

UNITED STATES MAGISTRATE JUDGE

EXHIBIT INDEX

Exhibit	Description
A	TK Health's July 9, 2026 responses to Plaintiff's first and second limited discovery requests (pages 1–8).
B	Medical Request #20,062,020 and response by "F. Nurse" (TKH 0042).
C	Selected provider, medication-directive, and alert records (TKH 0009, 0033, 0036), with full birth date redacted.
D	Medication administration history identifying Spinks, Henderson, and Andersen (TKH 0014–0015), with full birth date redacted.
E	Specific signature-authenticity comparison identified in Plaintiff's declaration (TKH 0045 and 0073).

EXHIBIT A

TK Health's July 9, 2026 discovery response (selected pages)

**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.

**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;
-

TK Health's July 9, 2026 discovery response (selected pages)

- (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

TK Health's July 9, 2026 discovery response (selected pages)

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.

TK Health's July 9, 2026 discovery response (selected pages)

- (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

TK Health's July 9, 2026 discovery response (selected pages)

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

TK Health's July 9, 2026 discovery response (selected pages)

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.

TK Health's July 9, 2026 discovery response (selected pages)

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

TK Health's July 9, 2026 discovery response (selected pages)

"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;

EXHIBIT B

Medical Request #20,062,020 and "F. Nurse" response (TKH 0042)

Medical Request - #20,062,020

From:	JASON LYNCH (651548)	Date Submitted:	06/11/2024 10:43 AM
Housing Area:	F	Date Received:	06/12/2024 6:33 AM
Assigned To:	Medical Group	Status:	CLOSED

Request

need my hiv meds its med thst must be taken daily

Response by F. Nurse on 06/12/2024 at 6:34 AM

Noted.

Printed on 06/12/2024 at 6:34 AM

Page 1 of 1
TKH 0042

EXHIBIT C**Provider note authorizing dissolution (TKH 0009)**

DOB REDACTED — Fed. R. Civ. P. 5.2

7/7/26, 9:33 AM

Patient History | v5.5.0

24-B01797	Chronic Care and/or Special Needs Note	Heart	No Murmurs or Clicks	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Lungs	No Wheezes	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Lungs	No Rales	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Assessment/Diagnosis	MI	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Degree of Control	Good	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Status	Stable	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Medications	allow Bivorty to dissolve in water for ten minutes prior to administration.	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Next Chronic Care / Follow-up Visit	90 days	White, Jonathan	08-23-2024 3:27 pm
24-B01797	Chronic Care and/or Special Needs Note	Name of medication(s) discussed:	(Diltiazem, emtricitabine & tenofovir alafenamide 50-200-25mg tablet OD PM; Directions: 1 tablet By Mouth OD PM;	White, Jonathan	08-23-2024 3:27 pm

Patient Request Forms

(No Records)

Education Forms

(No Records)

Custom Flows

Booking Number	Form Name	Form Item	Item Response	Interviewer	Interview Date
24-B01797	Segregation Rounds	Current Observations:	Alert / No Distress	Ladd, Kaitlyn	09-06-2024 5:39 pm
24-B01797	Segregation Rounds	Requested Medical Services:	No	Ladd, Kaitlyn	09-06-2024 5:39 pm
24-B01797	Segregation Rounds	Requested Mental Health Services:	No	Ladd, Kaitlyn	09-06-2024 5:39 pm
24-B01797	Segregation Rounds	Requested Dental Services:	No	Ladd, Kaitlyn	09-06-2024 5:39 pm
24-B01797	Segregation Rounds	Comments/Concerns and Follow Up if Required. Please be as detailed as possible.	N/A	Ladd, Kaitlyn	09-06-2024 5:39 pm
24-B01797	Segregation Rounds	Current Observations:	Alert / No Distress	Smith, Kaitlyn	09-06-2024 7:43 pm

<https://ar-white.turnkey.net/modules/ChartHistory.php>

9/37

TKH 0009

Crush/floating directive and unnamed provider note (TKH 0033)

DOB REDACTED — Fed. R. Civ. P. 5.2

7/7/26, 9:33 AM

Patient History | v5.5.0

Chart Notes

Note Date	Note Text	Note By	Note Access	Note Type
07-18-2024 4:01 pm	Called Baptist Health in NLR 501-202-4725. Spoke to Allie. Unsure if the clinic is able to see incarcerated patients. Will find out and let me know. This is the clinic that patient reports that he sees for Chronic Care Immunity services.	Wall, Ashley	Medical Staff	Medical Note
08-14-2024 9:46 am	Patient has put in numerous requests stating that his AIDS medication will no longer be available for him, and it was now White County's responsibility to pay for his medications. This nurse called Baptist Health Pharmacy to verify. Spoke with Nikki at 501-202-2460. Nikki confirmed that patient has 2 refills remaining. Prescriptions have been filled and picked up for \$4.70 previously.	Wall, Ashley	Medical Staff	Medical Note
08-15-2024 10:03 am	on 07/25/24 Medical was advised by jail administrative staff that all medications would need to be crushed and floated. Patient reports negative symptoms that he states is related to the medication being crushed. This nurse contacted Healdway pharmacy pharmacist about crushing medications. Pharmacist stated that medication effects would not be altered related to medication being crushed for administration. Facility Provider notified of situation. Patient continued to put in medical requests stating that medication was causing negative symptoms from being crushed. Medical attempted to move patient to medical for closer observation of negative symptoms being reported. Patient refused, signed a refusal, and reported the crushed medication didn't taste well but he wasn't having diarrhea or vomiting as he previously stated. Patient now reports that he is unable to obtain medication from his pharmacy after the last prescription was dropped off related to no refills. Spoke with Baptist Health Pharmacy to verify. Patient has 2 refills remaining at this time.	Wall, Ashley	Medical Staff	Medical Note
08-28-2024 3:55 pm	Allow Medication to dissolve in water for 10 minutes prior to administration per provider.	Wall, Ashley	Medical Staff	Medical Note

Problems

Date Opened	Problem Type	Problem Subtype	Current Status	Date Closed	Closed By
06-16-2024 9:25 am	TD - HIV Disease	[blank]	open	[blank]	.
08-23-2024 3:27 pm	Immunological	[blank]	open	[blank]	.

Scanned Documents

Date Scanned/Saved	06-12-2024 6:40 am
Document Type	Quick Archive document
Number of Pages	[blank]
mime	application/pdf
Link	Download
Print	
File Size	63 KB
Scanned/Saved By	Hobbs, Heather
Notes	[blank]

Date Scanned/Saved	06-12-2024 11:40 pm
Document Type	General Patient Chart Medication Acceptance
Number of Pages	1
mime	application/pdf
Link	Download

<https://ar-white.turnkey.health/modules/Chart/history.php>

33/37

TKH 0033

Medication-crush alert audit entries (TKH 0036)

DOB REDACTED — Fed. R. Civ. P. 5.2

7/17/26, 9:33 AM

Patient History | v5.5.0

Date of Reading	06-16-2024 9:25 am
Date Entered	06-16-2024 9:25 am
Blood Pressure Sitting	122/84
Blood Pressure Standing	[blank]
Pulse Sitting	77
Pulse Standing	[blank]
Respiration	18
Temperature	98.3
Weight	[blank]
SPO2	99.0
Notes	[blank]

Blood Glucose Levels

(No Records)

Medical Sick Calls

(No Records)

Dental Sick Calls

(No Records)

Mental Health Sick Calls

(No Records)

Alerts

Alert	Created By	Create Date	Removed By	Remove Date
"HIV POSITIVE"	Walt, Ashley	06-13-2024 11:40 am	.	[blank]
CRUSH MEDICATION	Walt, Ashley	08-15-2024 9:52 am	Smith, Kaldyn	09-06-2024 8:03 pm
Chronic Care - Immunity	White, Jonathan	08-23-2024 3:27 pm	.	[blank]
CRUSH MEDICATION	Smith, Kaldyn	09-06-2024 6:04 pm	.	[blank]

<https://at-white.tumkey.health/Modules/ChartHistory.php>

36/37

TKH 0036

EXHIBIT D

Medication administration history identifying Spinks, Henderson, and Andersen (TKH 0014)

DOB REDACTED — Fed. R. Civ. P. 5.2

7/7/26, 9:33 AM

Patient History | v5.5.0

08-06-2024 9:51 pm	Received	[blank]	Comandini, Melanie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-07-2024 8:39 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-08-2024 9:51 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-09-2024 10:08 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-10-2024 8:57 pm	Received	[blank]	Comandini, Melanie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-11-2024 8:24 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-12-2024 9:44 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-13-2024 9:15 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-14-2024 8:31 pm	Received	[blank]	Comandini, Melanie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-15-2024 10:31 pm	Received	[blank]	Comandini, Melanie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-16-2024 8:20 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-17-2024 8:21 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-18-2024 8:48 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-19-2024 10:11 pm	Received	[blank]	Comandini, Melanie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-20-2024 7:57 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-21-2024 8:33 pm	Received	[blank]	Hobbs, Heather	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-22-2024 10:31 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-23-2024 9:35 pm	Received	[blank]	Spinks, Y'Keiya	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-24-2024 9:46 pm	Received	[blank]	Spinks, Y'Keiya	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-25-2024 10:04 pm	Received	[blank]	Spinks, Y'Keiya	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-26-2024 8:43 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-27-2024 9:06 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-28-2024 9:50 pm	Refused	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-30-2024 4:53 am	Received	[blank]	Ward, Ashley	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-30-2024 7:16 pm	Received	[blank]	Henderson, Savannah	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
08-31-2024 8:57 pm	Received	[blank]	Henderson, Savannah	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
09-01-2024 7:46 pm	Received	[blank]	Henderson, Savannah	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
09-02-2024 10:50 pm	Received	[blank]	Andersen, Jamie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
09-03-2024 7:59 pm	Received	[blank]	Andersen, Jamie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM
09-04-2024 9:48 pm	Received	[blank]	Hobbs, Heather	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy) 50-200-25mg 1 tablet By Mouth QD PM

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14/37

TKH 0014

Medication administration history identifying Andersen (TKH 0015)

DOS REDACTED — Fed. R. Civ. P. 5.2

7/7/26, 9:33 AM

Patient History | v5.5.0

09-05-2024 9:49 pm	Received	[blank]	Smith, Kaitlyn	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy)) 50-200-25mg 1 tablet By Mouth QD PM
09-06-2024 9:45 pm	Received	[blank]	Andersen, Jamie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy)) 50-200-25mg 1 tablet By Mouth QD PM
09-07-2024 6:27 pm	Received	[blank]	Andersen, Jamie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy)) 50-200-25mg 1 tablet By Mouth QD PM
09-08-2024 9:07 pm	Received	[blank]	Andersen, Jamie	(bictegravir, emtricitabine & tenofovir alafenamide (Biktarvy)) 50-200-25mg 1 tablet By Mouth QD PM

Tasks

Appointment Scheduled Date	05-16-2024
Appointment Created Date	05-16-2024 9:25 am
Appointment Description	Intake Screening - Medical 05-16-2024 09:25 am on meds during intake
Appointment Category	RUR - Medication Verification
Priority (1=High, 5=Low)	1
Current Status	Rescheduled
Requested by Patient?	No
Appointment Set By	Ladd, Kaitlyn
Appointment Last Modified By	Jones, Heather
Last Modified Date and Time	06-16-2024 9:52 pm
Appointment Completed By	N/A
Completed Date and Time	N/A
Appointment Change Note	.
Change Note Type	Rescheduled Appointments
Change Note Date	05-16-2024 12:00 am
Change Note By	Jones, Heather

Appointment Scheduled Date	06-16-2024
Appointment Created Date	06-16-2024 9:25 am
Appointment Description	Intake Screening - Medical 06-16-2024 09:25 am Contact HSA to check on incarceration status
Appointment Category	ANC - Utilization Manager
Priority (1=High, 5=Low)	1
Current Status	Rescheduled
Requested by Patient?	No
Appointment Set By	Ladd, Kaitlyn
Appointment Last Modified By	Jones, Heather
Last Modified Date and Time	06-16-2024 9:54 pm
Appointment Completed By	N/A
Completed Date and Time	N/A
Appointment Change Note	.
Change Note Type	Rescheduled Appointments
Change Note Date	06-16-2024 12:00 am
Change Note By	Jones, Heather

Appointment Scheduled Date	05-17-2024
Appointment Created Date	06-16-2024 9:25 am

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15/37

TKH 0015

EXHIBIT E**Disputed General Consent for Care and Treatment (TKH 0045)****Turn+Key**
HEALTH**General Consent for Care and Treatment**

TO THE PATIENT: You have the right, as a patient, to be informed about your condition and the recommended surgical, medical or diagnostic procedure to be used so that you may make the decision whether or not to undergo any suggested treatment or procedure after knowing the risks and hazards involved. At this point in your care, no specific treatment plan has been recommended. This consent form is simply an effort to obtain your permission to perform the evaluation necessary to identify the appropriate treatment and/or procedure for any identified condition(s).

This consent provides us with your permission to perform reasonable and necessary medical examinations, testing and treatment. By signing below, you are indicating that (1) you intend that this consent is continuing in nature even after a specific diagnosis has been made and treatment recommended; and (2) you consent to treatment at WHITE OAK HOSPITAL CENTER (Facility). The consent will remain fully effective until it is revoked in writing or you are released from custody. You have the right at any time to discontinue services.

You have the right to discuss the treatment plan about the purpose, potential risks, and benefits of any test or treatment ordered for you. If you have any concerns regarding any test or treatment recommended by your health care provider, we encourage you to ask questions.

I voluntarily request health care providers, or the designees as deemed necessary, to perform reasonable and necessary medical examination, testing and treatment. I understand that if additional testing, invasive or interventional procedures are recommended, I will be asked to read and sign additional consent forms prior to the test(s) or procedure(s).

I certify that I have read and fully understood the above statements and consent fully and voluntarily to its contents.

[Signature]
Signature

6-15-24
Date

Susan Lynch
Printed Name

Kathryn Ladd
Printed Name of Witness

UPJ
Job Title

Kathryn Ladd
Signature of Witness

6-15-24
Date

RECEIVED

TKH 0045