

Please Docket in Both Cases
Below

SUBJECT: RE: Limited Discovery Request
DATE: 05/12/2026 04:36:02 PM

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

Jason Matthew Lynch
PLAINTIFF

#1

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

DOES, et al.
DEFENDANTS

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

Jason Matthew Lynch
PLAINTIFF

#2

v. Case No. 4:26-cv-00118-JM-JJV

CLAYTON EDWARDS, et al.
DEFENDANTS

PLAINTIFF'S LIMITED DISCOVERY REQUEST

FOR IDENTIFICATION OF DOE DEFENDANTS AND TO PROVE EXHAUSTION UNDER THE PLRA

COMES NOW Plaintiff, Jason Matthew Lynch, Reg. No. 07405-510, proceeding pro se, and for his narrowly tailored Limited Discovery Request, respectfully states as follows:

I. INTRODUCTION

Plaintiff respectfully states that this Court has already recognized that limited discovery is appropriate and necessary in these matters for the purpose of:

1. Identifying presently unknown "Doe" Defendants; and

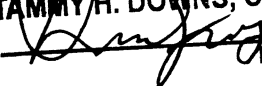
2. Addressing and proving exhaustion of administrative remedies under the Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a).

Plaintiff specifically states that this request is narrowly tailored only to those two issues. Plaintiff is NOT presently requesting broad merits discovery, video evidence, audio recordings, surveillance footage, body camera footage, expert materials, financial documents, unrelated personnel records, or any materials outside the scope of:

Sent to Defendants on 5/12

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAY 15 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

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Identifying Doe Defendants; and

Proving exhaustion and availability/unavailability of administrative remedies under the PLRA.

Plaintiff further states that nearly all evidence necessary to identify the unknown Defendants and prove exhaustion is solely within the possession, custody, and control of Defendants, White County, White County Detention Center staff, medical contractors, and associated agencies.

Without this limited discovery, Plaintiff cannot reasonably identify all responsible parties or fully respond to anticipated exhaustion defenses.

II. LEGAL AUTHORITY

Federal Rule of Civil Procedure 26(b)(1) permits discovery regarding any nonprivileged matter relevant to a party's claim or defense and proportional to the needs of the case.

Federal courts routinely permit limited discovery to identify unknown "Doe" defendants. See:

Munz v. Parr

Wakefield v. Thompson

Gillespie v. Civiletti

Additionally, under the PLRA, exhaustion is an affirmative defense which Defendants bear the burden of proving. See:

Jones v. Bock

Ross v. Blake

Administrative remedies that are unavailable, meaningless, obstructed, ignored, manipulated, retaliatory, or incapable of use are not required to be exhausted under the PLRA. See:

Ross v. Blake

Miller v. Norris

Fouk v. Charrier

Plaintiff respectfully states this discovery is directly relevant, narrowly tailored, and proportional to the needs of the case.

III. DEFINITIONS

For purposes of this Request, the following terms shall apply:

A. "Doe Defendants"

Any unidentified correctional officer, nurse, medical provider, supervisor, administrator, court personnel, transport officer, classification officer, grievance officer, or other individual involved in the incidents alleged in Plaintiff's complaints.

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B. "Relevant Time Frame"

June 9, 2024 through September 9, 2024, including reasonable periods immediately before and after those dates if necessary to identify responsible persons.

C. "Communications"

Includes grievances, inmate request forms, kiosk messages, electronic communications, appeals, responses, notes, logs, directives, routing records, or any communication between Plaintiff and jail staff.

D. "Medical Staff"

Includes all nurses, PM pill nurses, medication pass nurses, medical contractors, supervisors, physicians, Nurse "F," health service administrators, and all employees or agents of Turn Key Health Clinics or any contracted medical provider.

E. "Duty Rosters"

Any staffing schedule, shift assignment, housing assignment, assignment sheet, post log, duty log, pod assignment list, pill-call assignment list, transport assignment, or supervisory assignment identifying staff members working during the relevant period.

F. "Native Form"

The original electronic or paper form as maintained in the ordinary course of business, including timestamps, tracking numbers, metadata, routing information, and responses.

IV. LIMITED DISCOVERY REQUESTS

Plaintiff respectfully requests production of the following limited discovery:

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:

Full legal name;

Rank and title;

Employer;

Shift assignment;

Dates worked;

Assigned pod or housing unit;

Job duties;

Supervisory role;

Medical role;

Pill call responsibilities;

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Grievance responsibilities;

Court transport responsibilities.

Reason:

This information is necessary to identify presently unknown Doe Defendants and allow proper service under Federal Rule of Civil Procedure 4.

REQUEST NO. 2 ALL DUTY ROSTERS

Produce all duty rosters, shift schedules, staffing assignments, pod assignments, post assignments, and medical staffing schedules for:

F Pod;

Medical lockdown;

PM pill call;

Intake;

Segregation;

Court transport;

Court security/bailiff assignments.

Reason:

These records are necessary to determine which staff members personally participated in the acts alleged in Plaintiff's complaints.

REQUEST NO. 3 IDENTIFICATION OF "NURSE F"

Produce all documents sufficient to identify the individual referred to as "Nurse F."

Reason:

Plaintiff has alleged misconduct involving this individual and cannot complete service or amendment without identification.

REQUEST NO. 4 IDENTIFICATION OF ALL PM PILL NURSES

Produce the identities of all PM pill nurses working during the relevant time frame, including:

Full names;

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Dates worked;

Shift hours;

Medication assignment logs;

Medication cart assignments.

Reason:

Plaintiff alleges repeated denial, delay, interference, and mishandling of medication during PM pill call.

REQUEST NO. 5 SHERIFF IDENTIFICATION

Produce documents identifying the Sheriff of White County during 2024, including supervisory authority over detention operations.

Reason:

Plaintiff seeks to identify supervisory personnel and policymaking authority relevant to official-capacity and municipal liability claims.

REQUEST NO. 6 COURT DOCKET CONTROL AND COURTROOM ASSIGNMENTS

Produce documents sufficient to identify:

Who controlled inmate court-call scheduling;

Who determined inmate courtroom order;

Who controlled transport scheduling;

Who directed Plaintiff to be called first before all pods and inmates;

Who made the decision to make Plaintiff's wife wait until the final matter in the courtroom;

Any communications or directives regarding such scheduling decisions.

Reason:

Plaintiff alleges coordinated retaliatory and discriminatory conduct directly related to his claims under 42 U.S.C. § 1985 and constitutional retaliation claims.

Plaintiff specifically states that CO Martin informed Plaintiff he was "only doing what he was told," and a court bailiff informed Ms. Lynch that "someone above him" made the decision.

The identities of those persons are presently unknown and must be discovered.

V. REQUESTS RELATED TO PLRA EXHAUSTION

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:

Medical needs;

HIV medication;

Pill call;

Conditions of confinement;

Religious issues;

Staff misconduct;

Retaliation;

Legal mail;

Medical lockdown;

Housing;

Access to courts.

Plaintiff specifically requests the records in native form with:

Tracking numbers;

Timestamps;

Response dates;

Appeal dates;

Staff identifiers;

Routing history.

Reason:

These documents are directly relevant to exhaustion under 42 U.S.C. § 1997e(a).

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REQUEST NO. 8 GRIEVANCE POLICIES

Produce all grievance policies, inmate handbook provisions, appeal procedures, timelines, and directives governing inmate grievances during the relevant period.

Reason:

Necessary to determine whether administrative remedies were actually "available" under Ross v. Blake.

REQUEST NO. 9 GRIEVANCE LOGS

Produce all grievance tracking logs, kiosk logs, appeal logs, rejection logs, and grievance database entries related to Plaintiff.

Reason:

Necessary to verify exhaustion and determine whether grievances were ignored, destroyed, rejected, blocked, or improperly processed.

REQUEST NO. 10 COMMUNICATION RECORDS

Produce all inmate-to-staff communications submitted by Plaintiff relating to:

Medication;

Medical care;

Conditions of confinement;

Staff conduct;

Retaliation;

Legal mail;

Religious practices.

Reason:

Necessary to demonstrate repeated attempts by Plaintiff to seek relief through available administrative channels.

VI. NOTICE REGARDING PRESERVATION AND BAD FAITH

Plaintiff respectfully states for the record that, days before leaving White County Detention Center while housed in medical lockdown, Plaintiff created and maintained a detailed written log tracking grievance and inmate request numbers.

Plaintiff states there are well over one hundred grievance/request tracking numbers in the format of electronic tracking identifiers and kiosk records.

Plaintiff therefore places Defendants on formal notice that Plaintiff possesses independent tracking documentation and stands

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ready to identify inconsistencies, missing records, altered records, destruction of evidence, selective production, or bad-faith conduct.

Plaintiff further reserves the right to seek sanctions under Federal Rule of Civil Procedure 37 for any spoliation, concealment, destruction, or bad-faith withholding of discoverable material.

VII. NARROW TAILORING OF REQUEST

Plaintiff again emphasizes this request is intentionally narrow and limited.

Plaintiff is NOT presently requesting:

Video footage;

Audio recordings;

Body camera footage;

Broad personnel files;

Financial records;

Expert materials;

Internal affairs files unrelated to identification;

Merits discovery outside identification and exhaustion.

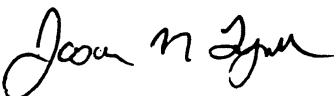
This request is limited solely to:

1. Identifying Doe Defendants; and
2. Proving exhaustion or unavailability of remedies under the PLRA:

VIII. CONCLUSION

WHEREFORE, Plaintiff respectfully requests that this Court order Defendants to produce the above limited discovery within a reasonable time period set by the Court, and for all other just and proper relief.

Respectfully submitted,

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