

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

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAR 19 2026

TAMMY H. DOWNS, CLERK
By  DEP. CLERK

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

JASON M. LYNCH
Plaintiff

v. Case 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

PLAINTIFF'S RESPONSE TO MEDICAL DEFENDANTS' NOTICE REGARDING SUPPLEMENTAL FILINGS (ECF 128)

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully submits this response to the Medical Defendants' "Notice Regarding Plaintiff's Supplemental Filings" (ECF No. 128), and states as follows:

I. INTRODUCTION

The Medical Defendants filed a "Notice" complaining about several filings made by Plaintiff. Importantly, the Notice does not request any relief from the Court, does not move to strike any filing under Rule 12(f), and does not identify any prejudice caused by Plaintiff's submissions.

Instead, the Notice merely attempts to characterize Plaintiff's filings as "procedurally improper." However, the Federal Rules of Civil Procedure, particularly when applied to pro se litigants, are to be construed liberally to ensure that cases are decided on their merits rather than technicalities.

The Eighth Circuit has repeatedly emphasized that pro se filings must be interpreted generously and held to less stringent standards than formal pleadings drafted by lawyers.

Erickson v. Pardus, 551 U.S. 89 (2007).
Stone v. Harry, 364 F.3d 912 (8th Cir. 2004).

Plaintiff's filings were submitted in good faith to clarify the record, respond to defenses raised by Defendants, and assist the

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

Court in understanding the factual and legal basis of Plaintiff's claims.

II. PLAINTIFF'S FILINGS ARE PERMISSIBLE CLARIFICATIONS AND RESPONSES

The Medical Defendants complain that Plaintiff filed replies to their answers.

However, nothing in the Federal Rules prohibits a litigant from submitting filings that clarify issues, respond to defenses, or assist the Court in managing the case.

Courts regularly allow such filings, particularly where they help narrow issues or clarify factual allegations.

Federal courts possess broad discretion to manage their dockets and consider supplemental filings when helpful to the Court.

Dietz v. Bouldin, 579 U.S. 40 (2016).

Moreover, Plaintiff's submissions simply addressed the affirmative defenses raised by Defendants, which is a legitimate effort to clarify disputed issues early in the litigation.

These filings do not prejudice Defendants in any way.

III. PLAINTIFF'S MORE DEFINITE STATEMENT WAS FILED TO ASSIST THE COURT

Defendants also complain about Plaintiff's filing titled "More Definite Statement Regarding Medical Care and Retaliation Claims."

Plaintiff filed that document in direct response to Defendants' Motion for More Definite Statement, in an effort to provide the Court with additional factual detail and clarify the issues raised in the case.

This filing was made to streamline the litigation, not to circumvent procedural rules.

Federal courts routinely permit supplemental clarifications where they assist in resolving Rule 12(e) issues.

The goal of Rule 12(e) is clarity, and Plaintiff's filing served exactly that purpose.

Striking such clarifications would elevate form over substance, which the Supreme Court has repeatedly discouraged.

IV. PLAINTIFF'S FILINGS ADDRESS LEGAL ISSUES RAISED BY DEFENDANTS

Defendants also object to Plaintiff's filings addressing summary judgment and immunity arguments.

However, Defendants themselves have raised numerous affirmative defenses, including immunity and dismissal-related arguments.

Plaintiff's filings merely explain why those defenses fail as a matter of law.

Federal courts routinely allow litigants to present legal arguments addressing anticipated dispositive issues, particularly where doing so promotes judicial efficiency.

Nothing in the Federal Rules prohibits Plaintiff from submitting legal memoranda addressing the issues already raised by Defendants.

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

V. DEFENDANTS IDENTIFY NO PREJUDICE

Notably, Defendants do not claim that:

Plaintiff's filings violated any court order
Plaintiff's filings prejudiced their defense
Plaintiff's filings require any response from them

Instead, the Notice merely states that Defendants "preserve objections."

Such generalized complaints do not justify limiting Plaintiff's ability to present facts and legal arguments.

VI. PLAINTIFF IS PROCEEDING PRO SE

Plaintiff is an incarcerated litigant proceeding without counsel.

Federal courts consistently hold that pro se litigants must be given reasonable latitude in their filings.

Haines v. Kerner, 404 U.S. 519 (1972).

Plaintiff's filings reflect a sincere effort to assist the Court, clarify the record, and respond to issues raised by Defendants.

They should therefore be considered in the interest of justice.

VII. DEFENDANTS' NOTICE REQUESTS NO RELIEF

Finally, Defendants' filing is styled as a "Notice."

It is not a motion, and it requests no specific relief from the Court.

Accordingly, there is nothing for the Court to grant or deny.

The filing therefore serves no practical purpose other than to complain about Plaintiff's efforts to clarify his claims.

VIII. CONCLUSION

Plaintiff's filings were submitted in good faith to clarify the record, address defenses raised by Defendants, and assist the Court in understanding the factual and legal basis of Plaintiff's claims.

They do not violate any rule or order of this Court and have not prejudiced Defendants in any way.

Plaintiff respectfully requests that the Court take no action on Defendants' Notice and allow the case to proceed on the merits.

