

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

JASON MATTHEW LYNCH	)	Case No. 4:26-cv-00118-JM-JJV
Plaintiff,	)	
v.	)	
WHITE COUNTY, ARKANSAS;	)	
CLAYTON EDWARDS;	)	
HANNAH ROSS;	)	
SERGEANT SWINDLE;	)	
JOHN DOES 1–10;	)	
JANE DOES 1–10; and	)	
SHERIFF OF WHITE COUNTY,	)	
Defendants.	)	

**PLAINTIFF’S THIRD AND RENEWED MOTION FOR EXTENSION OF TIME TO
IDENTIFY AND SUBSTITUTE DOE DEFENDANTS**

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully moves under Fed. R. Civ. P. 6(b)(1)(A) and, to the extent applicable, Fed. R. Civ. P. 16(b)(4), for a limited extension of the September 1, 2026 deadline to identify and substitute the remaining Doe Defendants.

This motion is based on material developments occurring after Plaintiff’s prior request.

Specifically, Plaintiff complied with the Court’s directive to meet and confer with defense counsel regarding Doe identification. The parties conducted that conference on August 6, 2026.

During the conference, Plaintiff narrowed and clarified the information sought. Defense counsel explained that she would need to contact White County, determine what records exist, gather and review those records, and respond. Counsel requested until August 20, 2026 to provide a response, and Plaintiff agreed that fourteen days was reasonable.

That agreed response date leaves Plaintiff approximately twelve calendar days before the September 1 deadline to review the information, match records to particular incidents, identify the correct individuals, prepare the required filing, and obtain sufficient service information.

Plaintiff therefore respectfully submits that good cause exists for a limited extension.

Plaintiff does not seek reconsideration of the Court’s prior ruling, sanctions, or a stay of

proceedings. He seeks only sufficient time to use the information the parties agreed Defendants would attempt to obtain.

I. RELEVANT PROCEDURAL HISTORY

1. This action concerns alleged unconstitutional conditions of confinement at the White County Detention Center during the period from approximately June 9, 2024, through September 9, 2024.
2. The operative claims are limited to the inhumane-conditions allegations identified by the Court, including alleged exposure to sewage, feces, blood, and black mold; sleeping on concrete; unsafe drinking water and inadequate nutrition; and lack of adequate exercise and yard call. The claims proceed against White County, Clayton Edwards, Hannah Ross, Sergeant Swindle, and Doe Defendants in their official capacities only. See Doc. 75.
3. Because Plaintiff did not know the legal names of certain individuals while confined, those individuals remain identified as John and Jane Doe Defendants.
4. The Court authorized limited discovery to identify the Doe Defendants. See Doc. 107. The Court later permitted Plaintiff until September 1, 2026, to identify and serve them. See Doc. 113.
5. Plaintiff previously sought discovery and additional time. The Court found that his earlier discovery was overbroad and directed him to narrow the requests and provide information concerning what each Doe allegedly did, where the conduct occurred, and the approximate time or circumstances.
6. The Court also directed the parties to meet and confer regarding Doe identification. Plaintiff respects that ruling and has attempted to comply with it.
7. This motion is not merely a repetition of Plaintiff's prior request. The August 6 conference created a concrete response timetable and demonstrated that the identifying information cannot be obtained, reviewed, and used meaningfully before September 1 without additional time.

II. PLAINTIFF COMPLIED WITH THE COURT’S MEET-AND-CONFER DIRECTIVE

8. On August 6, 2026, Plaintiff and defense counsel participated in a telephone conference concerning identification of the Doe Defendants.
9. Plaintiff has attached as Exhibit A a cleaned transcript of the conference. The transcript was prepared from an automated transcription of the recorded RingCentral conference. Plaintiff does not represent that it is a certified court-reporter transcript or a verbatim transcript. It is submitted solely to document the substance of the Court-ordered conference.
10. During the conference, Plaintiff clarified that he was not seeking information concerning every employee who worked in every pod during his confinement. Plaintiff narrowed the request to personnel assigned to, entering, supervising, or conducting rounds in F Pod, where the relevant events occurred.
11. Plaintiff also explained that RFID, electronic checkpoint, or similar records may help identify the employees who entered the area or conducted rounds during the relevant period.
12. Plaintiff explained that he intends to compare the identifying information with his contemporaneous notes, grievances, kiosk requests, and other records. He does not seek to name individuals merely because their names appear on a generalized employee roster.
13. Defense counsel indicated that she would confer with White County to determine what records exist and what information could be obtained and produced.

III. THE CONFERENCE ESTABLISHED A CONCRETE RESPONSE DATE

14. During the conference, defense counsel explained that some records might take time to gather and that counsel needed to contact White County and determine what records were available.
15. The parties discussed the September 1 deadline. Defense counsel requested approximately two weeks—until August 20, 2026—to respond to Plaintiff’s narrowed

requests. Plaintiff agreed that the requested period was reasonable.

16. Plaintiff agreed in good faith because he understands that locating and reviewing detention-center records may require time. Plaintiff does not contend that counsel acted in bad faith or refused to cooperate.
17. Counsel's requested response date, however, creates the scheduling problem now presented. If responses are served on August 20, Plaintiff will have only approximately twelve calendar days before September 1 to use them.

IV. GOOD CAUSE EXISTS UNDER RULE 6(b)(1)(A)

18. Fed. R. Civ. P. 6(b)(1)(A) permits the Court, for good cause, to extend a deadline when the request is made before the deadline expires.
19. Plaintiff is making this motion before the September 1 deadline. Good cause exists because Plaintiff has diligently pursued Doe identification and because the information necessary to identify the individuals is maintained principally by Defendants or persons acting on White County's behalf.
20. Plaintiff has:
 - * served targeted Doe-identification discovery;
 - * communicated with defense counsel;
 - * narrowed and clarified the requested information;
 - * participated in the Court-ordered meet and confer;
 - * agreed to counsel's requested August 20 response date;
 - * offered to perform the analysis necessary to match records to particular incidents;
and
 - * sought relief before the existing deadline expires.
21. Plaintiff's request is also consistent with Fed. R. Civ. P. 1, which directs that the Rules be construed and administered to secure the just, speedy, and inexpensive determination of

every action. A brief extension will promote accurate identification and avoid unnecessary motion practice caused by premature or incorrect substitutions.

22. Plaintiff is not asking Defendants to respond faster than the time permitted by the Federal Rules. Fed. R. Civ. P. 33(b)(2) and Fed. R. Civ. P. 34(b)(2)(A) ordinarily allow thirty days for interrogatory answers and responses to requests for production, subject to stipulation or court order. Plaintiff agreed to counsel's proposed response date. The deadline for using the responses should therefore be adjusted so that Plaintiff's agreement does not deprive him of a meaningful opportunity to identify the proper parties.

V. THE EXTENSION IS ALSO WARRANTED UNDER RULE 16(b)(4)

23. To the extent Fed. R. Civ. P. 16(b)(4) applies, good cause exists to modify the scheduling deadline.
24. The relevant circumstances arose after Plaintiff's earlier request: the parties conducted the Court-ordered conference, Plaintiff narrowed the discovery, and defense counsel requested until August 20 to obtain and review responsive information.
25. Plaintiff has acted diligently. The need for additional time is not attributable to a failure to pursue discovery, but to the timing of the newly established response date and the need to analyze records uniquely within Defendants' possession or control.
26. The Eighth Circuit recognizes that diligence and the circumstances surrounding a scheduling deadline are central to a good-cause determination . See *Munz v. Parr*, 758 F.2d 1254, 1257 (8th Cir. 1985).

VI. THE REQUEST IS NARROWLY TAILORED

27. Plaintiff has taken seriously the Court's prior determination that his earlier discovery was too broad.
28. Plaintiff now seeks information limited to:
 - * the relevant confinement period;

- * F Pod and related housing areas;
 - * personnel assigned to or entering that area;
 - * rounds, welfare checks, inspections, and cell entries;
 - * sanitation, sewage, mold, water, food, recreation, and lock-related records connected to the surviving claims; and
 - * records sufficient to identify individuals by full legal name, title, assignment, and service information.
29. Plaintiff is not seeking unrelated medical, religious, retaliation, damages, or general merits discovery.
30. The requests are proportional to the needs of this limited identification issue under Fed. R. Civ. P. 26(b)(1). The information is relevant because it may identify the persons who can properly be substituted for the Doe Defendants, and the burden of locating assignment-specific records is justified by the importance of preserving claims against the correct parties.

VII. ADDITIONAL TIME WILL AVOID PREJUDICE AND PROMOTE EFFICIENCY

31. The requested extension would allow Plaintiff to:
- a. review the responses and documents;
 - b. determine which names correspond to particular incidents;
 - c. distinguish employees who merely worked at the facility from those connected to the alleged conduct;
 - d. identify each proposed substitute by full legal name;
 - e. describe what each person allegedly did, where, and approximately when;
 - f. prepare the appropriate motion or amended pleading; and
 - g. provide information sufficient for service.

32. Requiring Plaintiff to make final identification decisions within approximately twelve days risks naming the wrong individuals, requiring corrective filings, causing unnecessary service attempts, and generating additional motion practice.
33. A short extension will not unfairly prejudice Defendants. Plaintiff does not seek to stay proceedings against White County, Edwards, Ross, or Sergeant Swindle. The named Defendants may continue litigating while Plaintiff completes the limited Doe-identification process.
34. The requested extension concerns only the deadline for identifying and serving presently unknown individuals. It will not prevent the case from proceeding against the named Defendants.

VIII. REQUESTED EXTENSION

35. Plaintiff requests a sixty-day extension of the September 1 deadline.
36. Sixty days after September 1, 2026, falls on October 31, 2026, a Saturday. Under Fed. R. Civ. P. 6(a)(1)(C), when the last day falls on a Saturday, Sunday, or legal holiday, the period continues until the next day that is not one of those days. Plaintiff therefore requests a new deadline of Monday, November 2, 2026.
37. Alternatively, Plaintiff requests thirty days after Defendants serve complete Doe-identification responses. This alternative would tie the deadline to the event necessary for Plaintiff to complete the identification process.
38. Plaintiff will identify the Doe Defendants sooner if he receives usable information before the requested deadline.

IX. RELIEF REQUESTED

WHEREFORE, Plaintiff Jason Matthew Lynch respectfully requests that the Court:

- a. Grant this Third and Renewed Motion for Extension of Time;
- b. Extend the September 1, 2026 deadline to identify and serve the Doe Defendants

until November 2, 2026;

- c. Alternatively, allow Plaintiff thirty days after Defendants serve complete Doe-identification responses to identify and seek substitution of the remaining Doe Defendants;
- d. Find that the motion is based on material developments following the Court-ordered August 6, 2026 meet and confer, including counsel's requested August 20 response date;
- e. Permit Plaintiff to file his Doe-identification and substitution materials promptly upon receiving and reviewing responsive information;
- f. Permit proceedings against the already-named Defendants to continue during the limited extension; and
- g. Grant such other relief as the Court finds just and proper.

Respectfully submitted,
/s/ Jason Matthew Lynch
Jason Matthew Lynch, Pro Se
261 Wilson Loop
Ward, Arkansas 72176
Telephone: (812) 405-5532
Email: _____
Date: _____

CERTIFICATE OF SERVICE

I certify that on this ____ day of August 2026, I served a true and correct copy of the foregoing Plaintiff's Third and Renewed Motion for Extension of Time to Identify and Substitute Doe Defendants, together with Exhibit A, upon:

Kaylen Suzanne Lewis, Esq. Owens & Parker Law Firm, P.A. Post Office Box 850 Conway,
Arkansas 72033-0850 Counsel for Defendants

by depositing a copy in the United States Mail, postage prepaid, and/or by electronic mail in accordance with the parties' authorized method of service.

/s/ Jason Matthew Lynch
Jason Matthew Lynch

EXHIBIT A

CLEANED TRANSCRIPT OF AUGUST 6, 2026 COURT-ORDERED

MEET-AND-CONFER CONCERNING IDENTIFICATION OF DOE DEFENDANTS

Submitted in support of Plaintiff's Third and Renewed Motion for Extension of Time to Identify and Substitute Doe Defendants.

This transcript was prepared from an automated transcription of the August 6, 2026 RingCentral conference and was cleaned solely for readability. It is not represented as a certified or verbatim court-reporter transcript. Plaintiff can provide the original automated transcript or recording if requested by the Court.