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VIA U.S. MAIL AND EMAIL

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Re: Lynch v. Does et al., No. 4:24-cv-00740-LPR-BBM

Subject: Second Good-Faith Notice of Incomplete Identifying Discovery, Demand for Immediate Supplementation, and Preservation Notice

Counsel:

I write jointly to counsel for the White County Defendants and counsel for the TK Health Defendants because the information needed to identify the remaining Doe defendants is divided between your clients. This letter is a renewed good-faith effort to resolve the identification dispute without further court intervention. To date, I have not been given all of the names and event-specific identifying information that I requested. I have reviewed the County attendance report, TK Health staffing records, medication-administration records, medical requests, grievance responses, and the written discovery responses. Those materials still do not identify who performed each disputed act.

I am not asking either group of Defendants to provide another general list of every person who may have worked at the facility. I am asking for the full legal names, titles, shifts, assignments, and specific roles of the people who actually interacted with me, entered the records at issue, made or carried out the challenged decisions, or supervised those events. A broad roster, a list of possibilities, or a reference to a large Bates range does not allow me to name and serve the proper defendants.

The urgency is substantial. The Court has required me to identify the remaining Doe defendants in a motion for service by August 31, 2026, and has extended the time for service only through October 13, 2026. Merits discovery closes December 1, 2026. Continued non-disclosure of basic identity information places me at risk of losing claims because I cannot responsibly guess which person should be named.

I. DEFICIENCIES IN THE COUNTY PRODUCTION

1. **Lt. Hannah Ross has not been clearly identified in the County attendance report.** The generated report appears to list Richard Ross, identified as a patrol sergeant, but it does not provide a clear entry for Lt. Hannah Ross or show her dates worked, shifts, assignments, housing-unit responsibilities, legal-mail role, supervisory duties, or interactions with me. Please confirm that Richard Ross and Hannah Ross are different people and provide Hannah Ross's complete employment and assignment information for June 9 through September 9, 2024.
2. **Lt. S. Hughes remains unclear.** The County production contains a name that appears to be Stevie Hughes, but it does not clearly establish whether that person is the same "Lt. S. Hughes" who answered my requests and grievances. The report also does not tie Hughes to any date, shift, title, communication, or event involving me. Please identify the full legal name and exact title of Lt. S. Hughes, confirm whether Stevie Hughes is that person, and identify every request, grievance, shift, and event associated with that individual.
3. **The generated County report is not a complete command-staff roster.** The final page contains handwritten additions for command personnel, including Kyle Toler, Clayton Edwards, Raymond Coffman, and Phillip Miller, rather than complete entries within the generated report itself. This demonstrates that the generated report, standing alone, is not a complete or self-explanatory identification response. Please provide a verified command-staff roster for the relevant period, including the Sheriff, Chief, Captain, all Lieutenants, jail administrators, shift commanders, transport supervisors, mail supervisors, and any person with authority over medical lockdown or medication-security practices.
4. **County personnel must be tied to the particular events.** Please identify the full legal name, title, shift, and role of each County employee who: (a) handled, opened, rejected, delayed, or refused to sign for my legal mail; (b) ordered, approved, or maintained my medical lockdown; (c) directed Officer Joseph Martin to remove or transport me before other inmates; (d) directed or caused my wife to wait until the end of the courthouse docket; (e) escorted or supervised pill call; (f) possessed body-camera footage of the relevant events; or (g) issued any written, oral, radio, or electronic directive concerning my housing, movement, mail, medication, or access to the courts.

II. DEFICIENCIES IN THE TK HEALTH PRODUCTION

1. **"Nurse F" has not been definitively identified.** TK Health has suggested possible float nurses, but a list of possible names is not an answer. Please identify the exact person who used the designation "F. Nurse" for each medical request or communication, including Medical Request No. 20,062,020 dated June 11, 2024 and every later request bearing that designation. For each entry, provide the person's full legal name, license and title, employer, shift, facility assignment, electronic user ID, and the basis for the identification.
2. **The physician or provider who evaluated me late in my stay has not been properly identified.** The produced record appears to attribute a late-stay chronic-care assessment and an instruction to allow Biktarvy to dissolve in water for ten minutes before administration to "White, Jonathan." Please confirm whether Jonathan White was the physician, nurse practitioner, physician assistant, or other provider who personally evaluated me near the end of my White County confinement. If so, provide his full legal name, professional degree, license, employer, job title, dates and method of examination, and complete encounter note. If he was not the provider, identify the actual provider who examined me and made or approved the medication instruction.

3. The alleged physician and pharmacist approval for crushing, floating, or dissolving

Biktarvy remains unidentified. County responses stated that a physician and pharmacist had been consulted and had approved crushing and floating medication. TK Health and the County must identify each physician, pharmacist, provider, pharmacy, or contractor allegedly consulted; state the date, time, and method of consultation; identify who initiated the contact; and produce the written order, telephone note, message, policy, or other record memorializing the advice. If no such consultation or written authorization exists, state that clearly in a sworn supplemental response.

4. The medical names already produced are not tied to specific conduct. The records include names such as Ashley Watt/Watts, Kaitlyn Smith, Katlyn Ladd, Heather Jones, Heather Hobbs, Savannah Henderson, Ykebiya Spinks, Jamie Andersen, and Melanie Comandini. Please identify, for each disputed date, who personally administered, withheld, crushed, dissolved, floated, contaminated, wasted, or documented my medication; who entered "received," "refused," "absent," or "not given" in the MAR; who created or modified the related task or appointment; and who supervised or directed that action. Presence on a staffing list does not establish which person performed the act.

III. REQUIRED FORM OF THE SUPPLEMENTAL RESPONSE

For each person or event identified above, please provide a clear response containing:

- A.** Full legal name, including any former name, alternate spelling, or surname used in the records;
- B.** Job title, rank, medical credential, license type, employer, and department;
- C.** Date, shift, housing unit, pill-call assignment, transport assignment, mail assignment, or supervisory assignment;
- D.** The specific act, communication, record entry, order, or decision associated with that person;
- E.** Any signature, initials, abbreviation, electronic user ID, audit-trail identifier, or shorthand used by that person;
- F.** The source record used to make the identification; and
- G.** Information sufficient for service. I am not requesting public disclosure of private home addresses; any protected service address may be submitted to the Court or U.S. Marshal under seal.

If either group of Defendants contends that an identity cannot be determined, please do not simply state that the information is unknown. Provide a sworn description of the search performed, including the databases, schedules, rosters, audit logs, e-mail systems, medical-record systems, user-access logs, personnel records, and custodians consulted; the date of the search; the person who conducted it; and the reason the identity cannot be determined. If one group believes the other group holds the information, please confer with one another and provide a coordinated response rather than referring me back and forth.

IV. NOTICE OF PREJUDICE, PRESERVATION, AND REQUEST TO CURE

I have identified every person I reasonably can from the materials produced. I cannot ethically or responsibly name a person as a defendant merely because the person appears somewhere on a general roster. The remaining information is within Defendants' possession, custody, or control. Continued withholding or non-disclosure of that information is not just, especially when the Court has placed identification and service deadlines on me. It shifts the consequences of incomplete recordkeeping or incomplete responses onto the party who does not control the records.

Please treat this letter as continuing notice to preserve all County and TK Health duty rosters, shift schedules, time records, pill-call assignments, MAR/eMAR audit trails, native medical records, user-access logs, scanned documents, revision histories, telephone and pharmacy communications, legal-mail logs, transport records, courthouse movement records, radio traffic, body-camera assignments and footage, directives, and communications concerning the identities and events described above.

Please serve complete, verified supplemental responses within ten (10) calendar days after receipt of this letter. Please do not respond by re-sending the same general rosters, Bates ranges, or lists of possible names. If a short conference would resolve any issue, I am available by telephone or in writing. In the absence of a complete response, I will place this correspondence before the Court as evidence of my good-faith effort and seek appropriate relief, including an order compelling event-specific identification and any necessary extension or protection concerning the Doe-identification and service deadlines.

This request does not ask either counsel to concede liability or the merits of any claim. It asks only that the people who participated in, documented, authorized, supervised, or witnessed the relevant events be accurately identified so the case can proceed on the merits.

Respectfully,



Jason Matthew Lynch, Plaintiff Pro Se
Case No. 4:24-cv-00740-LPR-BBM

cc: All counsel of record