

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

TO: 07405510

DATE: 08/30/2025 04:06:03 PM

Got it. What you're asking for is essentially a comprehensive discovery request (Rule 34 & Rule 33 requests for production & interrogatories) tailored to your federal civil rights case under 42 U.S.C. §§ 1981, 1983, and 1985.

Below I'll draft you a detailed Discovery Request in proper federal format, citing relevant law showing why you're entitled to these materials (mainly Rule 26(b)(1) Fed. R. Civ. P. on broad discovery, Rule 34 on production, Rule 33 on interrogatories, and constitutional/case law on the importance of records in prisoner-rights litigation).

Plaintiff's First Set of Discovery Requests

(Requests for Production of Documents, Things, and Interrogatories)

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

Jason Matthew Lynch, Plaintiff,

v.

Does, Sheriff Clayton Edwards, White County Jail, Turnkey Medical Staff, Jail Staff, White County Commission, et al.,
Defendants.

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

INTRODUCTION

Pursuant to Fed. R. Civ. P. 26, 33, and 34, Plaintiff Jason Lynch hereby requests that Defendants produce the following documents and answer the following interrogatories within thirty (30) days. These requests are reasonably calculated to lead to the discovery of admissible evidence under Rule 26(b)(1), are proportional to the needs of this case, and are necessary to establish Plaintiff's claims under 42 U.S.C. §§ 1981, 1983, and 1985.

The U.S. Supreme Court has consistently held that civil rights plaintiffs are entitled to broad discovery in order to prove constitutional violations. See *Hickman v. Taylor*, 329 U.S. 495 (1947) (discovery rules are to be accorded broad and liberal treatment); *Crawford-El v. Britton*, 523 U.S. 574 (1998) (civil rights plaintiffs must be given "fair opportunity" to uncover evidence of unconstitutional intent); *Bounds v. Smith*, 430 U.S. 817 (1977) (access-to-courts includes access to necessary evidence).

DEFINITIONS

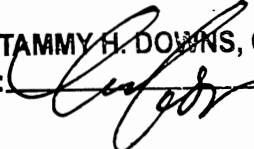
"You" or "Defendants" includes White County, White County Jail, Sheriff Clayton Edwards, Turnkey Health, staff, employees, and contractors.

"Document" has the meaning under Fed. R. Civ. P. 34 and includes electronic communications, emails, databases, videos, and audio recordings.

"Plaintiff" refers to Jason Matthew Lynch.

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

SEP 05 2025

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

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REQUESTS FOR PRODUCTION

Plaintiff requests the following:

1. All grievances filed by Plaintiff Jason Lynch, including responses, denials, approvals, and appeals, from June 1, 2024 to present.

Authority: Brady v. Maryland, 373 U.S. 83 (1963) (suppression of material evidence violates due process); Walker v. Bowersox, 526 F.3d 1186 (8th Cir. 2008) (grievances relevant to conditions-of-confinement claims).

2. All grievances filed by any other inmate relating to Plaintiff Lynch, or raising the same issues (medical, religious, mail, retaliation, commissary, nail clippers, etc.), with responses.

3. All grievances filed against Sheriff Clayton Edwards, Turnkey staff, and jail staff from 2020 present, with responses.

4. All medical request forms submitted by Jason Lynch, including dates, medical notes, and responses.

5. All medical notes, diagnoses, and records maintained by Turnkey staff on Jason Lynch.

6. Medication records, pill call logs, medication administration records (MARs), and refusals relating to Jason Lynch, including identification of staff present when medications were dispensed.

7. Records of medication drop-offs by Lynch's wife, including dates, pills dropped off, and whether accepted or rejected.

8. List of all inmates who were prescribed antiretroviral medications (such as Biktarvy) or HIV treatment medications during the same period Lynch was incarcerated.

9. All intake logs, booking records, medical screening forms, and housing assignments concerning Jason Lynch.

10. Duty rosters, staffing logs, and assignment sheets for guards, administrative staff, and medical staff for June 1, 2024 September 30, 2024.

11. All records of outgoing and incoming legal and non-legal mail relating to Jason Lynch, including log books, mailroom notes, refusals, and signatures.

12. All communications, including emails, memoranda, or notes, concerning Jason Lynch's legal mail, medical needs, housing, or grievances, including any orders or directives from Sheriff Edwards or other supervisors.

13. The email or memorandum authored by Lt. Ross directing staff not to accept or sign for Jason Lynch's legal mail.

14. All records from the "Smart JailMail" system, including messages sent or received by Jason Lynch and any monitoring or blocking of those communications.

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15. All audio, video, or bodycam recordings of Jason Lynch, including pill call, housing unit surveillance, transport, grievance discussions, and medical visits, from June 1, 2024 to present.

16. Pod call logs and telephone records, including calls made by Plaintiff, call monitoring logs, and restrictions placed.

17. Records of nail clippers being issued to inmates, including dates and housing pods.

18. Jail policies, handbooks, standard operating procedures, and training manuals, including:

Inmate handbook provided to Lynch.

Employee handbooks.

Jail policies on mail, grievances, medical treatment, religious services, commissary, and legal access.

19. List of all clergy, religious volunteers, or chaplains who conducted religious services during Plaintiff's incarceration, including their schedules.

20. Complete commissary item list available during Plaintiff's incarceration.

21. All lawsuits, tort claims, and death claims filed against White County Jail, White County, or Sheriff Edwards within the last ten years.

22. Minutes, notes, or recordings of closed-door meetings in which Plaintiff Jason Lynch was discussed.

23. Court dockets, warrants, or records relating to Jason Lynch and his wife, as held or referenced by jail staff.

24. Index, catalog, or general log of all documents maintained by White County Jail and Turnkey relating to Jason Lynch.

INTERROGATORIES

1. Identify all staff members (by name, title, and duties) employed at White County Jail and Turnkey during Plaintiff's incarceration (June 1, 2024 Sept 30, 2024).

2. Identify which staff were present during Plaintiff's pill calls, including officers assigned to accompany the nurse.

3. Identify all persons who handled or had authority over Plaintiff's incoming and outgoing legal mail.

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4. Identify all persons who issued orders or directives concerning Plaintiff's grievances, medical care, or mail.

5. Identify all inmates who filed grievances mentioning Plaintiff Lynch.

LEGAL BASIS

Fed. R. Civ. P. 26(b)(1): permits discovery of any nonprivileged matter relevant to a claim or defense.

Fed. R. Civ. P. 34(a): allows requests for production of documents, ESI, and tangible things.

Fed. R. Civ. P. 33: allows interrogatories to parties.

Bracy v. Gramley, 520 U.S. 899 (1997): discovery appropriate when it could uncover evidence of unconstitutional conduct.

Harlow v. Fitzgerald, 457 U.S. 800 (1982): government officials may be liable under §1983 when violating clearly established rights.

Monell v. Dept. of Soc. Servs., 436 U.S. 658 (1978): discovery into policies, customs, and practices of the County is required.

Bounds v. Smith, 430 U.S. 817 (1977): access-to-courts requires meaningful legal access, including records.

This draft is very broad but defensible, since civil rights discovery is typically wide-ranging.

Would you like me to also draft a separate Motion to Compel Discovery (in case they object or withhold documents), so you'll already have the arguments and case law ready to file if they refuse?

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