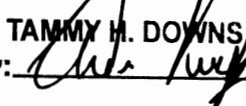


FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

JUL 29 2026

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

TAMMY H. DOWNS / CLERK
By:  /
DEP CLERK

JASON LYNCH,	)	No. 4:24-cv-00740-LPR-BBM
PLAINTIFF	)	
v.	)	
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 OMNIBUS MOTION TO COMPEL, FOR SUPPLEMENTAL
DISCOVERY, TO ENTER MATERIAL FACTS INTO THE RECORD, AND TO ADD
ADDITIONAL DEFENDANTS**

Plaintiff Jason Lynch, proceeding pro se, respectfully moves the Court for an omnibus order compelling supplemental discovery and requiring Defendants to provide complete responses sufficient to identify the Doe defendants and the medical personnel involved in Plaintiff's care. Plaintiff also asks the Court to enter the below-listed facts into the record for purposes of identifying additional defendants and clarifying the claims already at issue.

I. Relief Requested

Plaintiff requests that the Court:

- a. Compel TK Health to supplement its discovery responses with the full legal names, titles, and roles of the nurses, supervisors, and other staff who administered, altered, refused, or discussed Plaintiff's medication during the relevant period;
- b. Compel TK Health to identify who "F. Nurse" was for each relevant request and to identify the person reflected on each MAR entry;

- c. Order production of any records sufficient to show who administered, crushed, floated, dissolved, withheld, or altered Plaintiff's medication;
- d. Enter the below facts into the record as factual allegations supporting amendment of the pleadings;
- e. Allow Plaintiff to add the additional defendants listed below; and
- f. Grant such other and further relief as the Court deems just and proper.

II. Legal Standard

Rule 26 permits discovery regarding any nonprivileged matter relevant to any party's claim or defense and proportional to the needs of the case. Rule 37 authorizes a motion to compel when a responding party's answers are incomplete, evasive, or improperly refer the requesting party to undifferentiated records. Under Rule 15, leave to amend should be freely given when justice so requires, and the relation-back doctrine may permit amendment where the requirements are met. Rule 15(c)(1)(C) turns on whether the party to be added knew or should have known, within the Rule 4(m) period, that the action would have been brought against it but for a mistake concerning the proper party's identity. The Supreme Court's decision in *Krupski v. Costa Crociere S.p.A.*, 560 U.S. 538 (2010) directs the focus to the prospective defendant's knowledge, not the plaintiff's diligence. In the Eighth Circuit, however, naming a John Doe defendant generally does not constitute a "mistake" for relation-back purposes. Plaintiff therefore seeks to preserve and identify the actual persons involved while the record remains fresh.

III. TK Health's Responses Are Evasive and Incomplete

TK Health's discovery responses direct Plaintiff to broad MAR records, staffing records, and pages of charts without clearly identifying which specific nurse or supervisor performed the challenged acts. Those responses are not sufficient where Plaintiff specifically requested the identity of the people who:

- * administered or refused medication;

- * altered medication from whole to crushed/float/dissolved form;
- * told Plaintiff the medication was being handled one way when the chart reflected another;
- * recorded that Plaintiff “refused” medication when Plaintiff contends he did not refuse it; and
- * interacted with Plaintiff at pill call, intake, chronic care, or medical lockdown.

Plaintiff does not seek generic categories. He seeks names tied to specific dates and conduct.

IV. Facts to Be Entered Into the Record

Plaintiff asks the Court to enter the following facts into the record for purposes of discovery, amendment, and identification of defendants:

A. June 2024 intake and early medication handling

1. Plaintiff was booked into White County Detention Center on or about June 10, 2024.
2. Plaintiff’s records reflect an intake screening completed by Katlyn Ladd on June 16, 2024, including notation that Plaintiff was HIV positive and taking Biktarvy.
3. Plaintiff’s records reflect a medical request dated June 11, 2024, stating he needed his HIV medication because it had to be taken daily, and the response was from “F. Nurse.”
4. Plaintiff contends that the notation that he “refused” medication on certain dates is inaccurate because he was incarcerated and did not receive medication in the manner recorded, or did not receive medication at all.

B. July 2024 medication alteration and crushing issue

5. On July 24-26, 2024, Plaintiff repeatedly complained that Biktarvy was being crushed, burned him, made him sick, and caused him to vomit it back up.
6. Plaintiff states that on July 26, 2024, Nurse Kaitlyn Smith mishandled his medication by crushing it and recording that he received medication, even though he contends he was

not actually given the medication in a proper form.

7. Plaintiff further contends Heather Jones altered medication administration on July 26 and July 27, 2024, and that the MAR reflects those events.
8. Plaintiff contends that crushing Biktarvy is prohibited by manufacturer guidance and that he was repeatedly informed by outside medical providers not to crush the medication.
9. Plaintiff contends that on July 25, 2024, Captain Edwards directed that all medications be crushed and floated for safety and security reasons, despite Plaintiff's repeated objections and complaints of adverse effects.

C. August 2024 medication administration and specific nurses

10. Plaintiff contends that Melanie Comandini stated medication could not be crushed, refused to crush it, and advised Plaintiff not to reveal to head nurse or administration that she was not crushing his medication.
11. Plaintiff contends that Heather Hobbs first administered his medication on or about August 21, 2024, and that the medication was altered.
12. Plaintiff contends that Y'Kebiya Spinks administered medication on August 23, 24, and 25, 2024.
13. Plaintiff contends that Savannah Henderson altered or administered medication on August 30, 31, and September 1, 2024.
14. Plaintiff contends that Jamie Andersen administered medication on September 2, 3, 6, 7, and 8, 2024.
15. Plaintiff contends that the medication administration records show numerous entries for these dates, but the records do not clearly identify who made the decisions about crushing, floating, dissolving, or recording "received" versus "refused."

D. June 14-16 and "refused" entries

16. Plaintiff contends that Katlyn Ladd administered medication at White County on June 14, 15, and 16, 2024, and marked Plaintiff as absent or not receiving medication, though

Plaintiff states he was physically present in custody and was not absent.

17. Plaintiff contends that any entry stating he “refused” medication is misleading because if he declined anything, it was due to the medication being altered into a form he should not take.

E. Sheriff Phillip Miller and supervisory liability

18. Plaintiff contends Sheriff Phillip Miller had direct knowledge of the medication issue and failed to intervene.
19. Plaintiff seeks to preserve facts supporting supervisory-liability, negligent hiring, negligent training, and negligent supervision claims against Sheriff Miller to the extent the evidence shows knowledge, control, and deliberate inaction.

V. Additional Defendants Plaintiff Seeks to Add

Plaintiff respectfully requests leave to amend to add the following defendants, based on the facts above and the records produced to date:

Proposed Defendant	Claimed Role / Basis
Kaitlyn Smith / Caitlin Smith	Allegedly crushed or otherwise mishandled Biktarvy on July 26, 2024; MAR allegedly reflects receipt despite Plaintiff’s denial of proper administration
Heather Jones	Allegedly altered medication administration on July 26-27, 2024; implicated in crushed medication events
Melanie Comandini	Allegedly refused to crush medication because it could not be crushed; potential witness and potential defendant
Heather Hobbs	Allegedly altered medication administration beginning around August 21, 2024
Y’Kebiya Spinks	Allegedly administered medication on August 23-25, 2024
Savannah Henderson	Allegedly altered medication administration on August 30-31 and September 1, 2024

Jamie Andersen	Allegedly administered medication on September 2-3 and September 6-8, 2024
Sheriff Phillip Miller	Alleged supervisory liability, failure to intervene, negligent hiring/training/supervision

VI. Request for Specific Discovery and Identification

Plaintiff requests an order requiring TK Health to supplement its responses by identifying:

- a. The full legal name of “F. Nurse” for each medical request dated June 11, 2024 and July 6-9, 2024;
- b. The full legal name of each nurse reflected in the MAR entries for June through September 2024;
- c. The person or persons responsible for deciding whether Biktarvy would be crushed, floated, or dissolved;
- d. The person or persons who instructed staff to record medication as “received” when Plaintiff contends it was not properly administered;
- e. Any policy, directive, or communication stating that Plaintiff’s medication was to be crushed notwithstanding Plaintiff’s repeated complaints;
- f. Any records showing consultation with the pharmacist or prescriber regarding whether Biktarvy could be crushed.

VII. Request for Amendment

Plaintiff respectfully requests leave to file an amended complaint adding the defendants identified above and incorporating the facts set out in this motion. The proposed amendment arises from the same course of conduct already at issue: Plaintiff’s medication administration, alleged alteration of medication, alleged falsification or inaccuracy of MAR entries, and supervisory indifference.

VIII. Conclusion

For the foregoing reasons, Plaintiff respectfully requests that the Court grant this omnibus motion, compel supplemental discovery, enter the above facts into the record, and allow Plaintiff to add the proposed defendants.

Respectfully submitted,

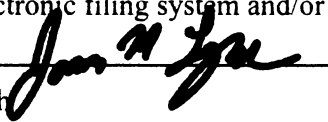
JASON LYNCH

Plaintiff, Pro Se

Date: 7-14

Certificate of Service

I certify that on 7-14, I served a copy of the foregoing on counsel of record by the Court's electronic filing system and/or by first-class mail as applicable.



Jason Lynch