

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

SUBJECT: RE: Memorandum of Law
DATE: 03/16/2026 04:06:05 PM

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

Jason Matthew Lynch
Plaintiff

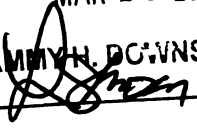
v.

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

Clayton Edwards, et al.
Defendants

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAR 23 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S RIGHT TO FILE NOTICES, MEMORANDA OF LAW, AND
OBJECTIONS TO DEFENDANTS' ERRONEOUS DEFENSES AND MOTIONS

Plaintiff Jason Matthew Lynch, appearing pro se, respectfully submits this Memorandum of Law to clarify the legal basis supporting his right to file Notices, Memoranda of Law, and Objections to Defendants' pleadings, motions, and asserted defenses when those filings:

1. Contain errors of fact or law,
2. Assert boilerplate defenses that do not apply to the case,
3. Appear to function primarily as delay tactics, or
4. Require clarification in order for the Court to properly evaluate the issues presented.

Plaintiff submits this memorandum not to burden the Court or the Defendants, but rather to assist the Court in resolving the issues before it fairly and efficiently while protecting Plaintiff's constitutional rights.

I. INTRODUCTION

This case arises from serious constitutional violations committed against Plaintiff while he was incarcerated at White County Jail in Arkansas. Plaintiff alleges violations of his civil rights under 42 U.S.C. §§ 1981, 1983, and 1985, including:

denial of medical care,
interference with legal mail,

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retaliation,

religious discrimination,

unconstitutional jail conditions, and

conspiracy by jail officials.

The Defendants have filed responses and motions asserting numerous defenses. When such defenses are factually inaccurate, legally unsupported, or clearly inapplicable, Plaintiff must be permitted to bring those errors to the Court's attention.

Plaintiff is currently incarcerated and has been learning to litigate his case without formal legal training or assistance of counsel. Despite these limitations, Plaintiff has attempted to present filings that clarify the record, respond to erroneous arguments, and ensure that the Court has the correct facts and law before it.

Federal law strongly protects the rights of pro se litigants, particularly incarcerated individuals, to meaningfully participate in their own litigation.

II. PRO SE FILINGS MUST BE LIBERALLY CONSTRUED

The Supreme Court has repeatedly held that filings submitted by pro se litigants must be liberally construed and should not be dismissed merely because they are imperfectly drafted.

In *Haines v. Kerner*, the Supreme Court held:

> "A pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers."

Similarly, the Supreme Court reaffirmed this principle in *Erickson v. Pardus*, stating that courts must construe pro se pleadings liberally to ensure meaningful access to justice.

The Eighth Circuit Court of Appeals, which governs this Court, has consistently applied this rule.

In *Stone v. Harry*, the court held:

> "When a litigant files a complaint pro se, the court must liberally construe the pleadings."

III. FEDERAL RULES EXPRESSLY ALLOW RESPONSES AND OBJECTIONS TO DEFENSES AND MOTIONS

The Federal Rules of Civil Procedure explicitly permit parties to challenge insufficient defenses and respond to motions or pleadings that are improper.

A. Rule 7 Permits Written Motions and Responses

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Under Federal Rule of Civil Procedure 7, parties may file written motions and supporting memoranda explaining the legal basis for their position.

Rule 7(b) states that:

> A request for a court order must be made by motion and must state with particularity the grounds for seeking the order.

This rule permits litigants to file memoranda of law explaining why a particular motion or defense is incorrect.

B. Rule 12(f) Allows Challenges to Improper Defenses

Under Federal Rule of Civil Procedure 12(f), courts may strike defenses that are:

insufficient,

redundant,

immaterial, or

impertinent.

Courts frequently strike boilerplate affirmative defenses that lack factual support.

For example, in *Zotos v. Lindbergh School District*, the Eighth Circuit recognized the court's authority to strike insufficient defenses under Rule 12(f).

When defendants assert defenses that clearly do not apply to the case, Plaintiff has the right to bring those issues to the Court's attention through motions, notices, or memoranda.

C. Rule 8 Requires Defenses to Have Legal and Factual Basis

Under Federal Rule of Civil Procedure 8, defendants must provide:

a short and plain statement of their defenses,

supported by facts.

The Supreme Court clarified in *Ashcroft v. Iqbal* and *Bell Atlantic Corp. v. Twombly* that pleadings must contain plausible factual allegations, not merely legal conclusions.

When defendants rely on generic or boilerplate defenses that lack factual support, Plaintiff is permitted to object or request clarification.

IV. PRO SE PRISONERS HAVE A CONSTITUTIONAL RIGHT OF ACCESS TO THE COURTS

The Supreme Court has long recognized that incarcerated individuals have a constitutional right to meaningful access to the

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courts.

In *Bounds v. Smith*, the Court held:

> Prisoners have a fundamental constitutional right of access to the courts.

The Court further explained in *Lewis v. Casey* that prisoners must have the ability to challenge constitutional violations affecting them.

This right would be meaningless if a prisoner could not:

respond to incorrect legal arguments,

clarify the record, or

object to filings that could unfairly prejudice their case.

V. COURTS ENCOURAGE CLARIFICATION OF THE RECORD

Federal courts regularly permit parties to submit notices or memoranda that clarify issues or correct inaccuracies in the record.

Courts recognize that doing so:

assists judicial efficiency,

prevents misunderstanding of the issues, and

ensures that cases are decided on their merits.

The Eighth Circuit has emphasized that federal courts favor decisions on the merits rather than technical procedural barriers.

In *Foman v. Davis*, the Supreme Court explained:

> The Federal Rules of Civil Procedure were designed to facilitate decisions on the merits rather than technicalities.

Thus, when Plaintiff submits notices or memoranda addressing incorrect arguments by Defendants, he is acting in a manner consistent with the purpose of the Federal Rules.

VI. PLAINTIFF IS NOT ATTEMPTING TO BURDEN THE COURT OR DEFENDANTS

Plaintiff respectfully emphasizes that his filings are not intended to harass the Defendants or unnecessarily burden the Court.

Rather, Plaintiff's purpose is to:

clarify the issues,

correct inaccurate statements,

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respond to motions affecting his rights, and
assist the Court in reaching a fair determination.

Plaintiff's case involves serious constitutional violations that have had lasting consequences for his life, liberty, health, and future.

Because Plaintiff is incarcerated and proceeding without counsel, he must rely on the only tools available to him: written filings submitted to the Court.

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VII. PLAINTIFF'S STATUS AS A SELF-TAUGHT PRISONER LITIGANT

Plaintiff acknowledges that he does not possess advanced legal training. He has been learning to litigate from within prison, relying on limited legal materials and his own efforts.

Nevertheless, when Plaintiff identifies filings by Defendants that are:

clearly incorrect as a matter of law,
factually inaccurate,
irrelevant to the claims in this case, or
evidently intended to delay proceedings,

Plaintiff has the right to bring those issues to the Court's attention.

This is not improper conduct; rather, it is exactly how the adversarial system of justice operates.

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VIII. ALLOWING PLAINTIFF TO CLARIFY THE RECORD PROMOTES JUDICIAL EFFICIENCY

Allowing Plaintiff to submit notices and memoranda addressing incorrect arguments actually helps move the case forward.

Clarifying legal errors early:

prevents unnecessary motions later,
ensures the Court considers accurate facts, and
helps avoid confusion in the record.

Courts frequently rely on such filings to better understand the positions of the parties.

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IX. CONCLUSION

Federal law, the Federal Rules of Civil Procedure, and binding Supreme Court precedent all confirm that Plaintiff has the right

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to:

file notices clarifying the record,

submit memoranda of law addressing legal issues,

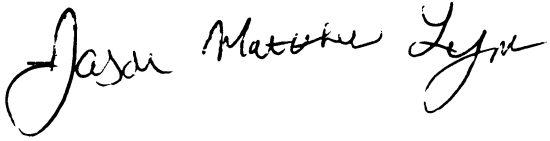
respond to defendants' motions and defenses,

object to legally insufficient or factually inaccurate defenses, and

bring delay tactics or improper filings to the Court's attention.

Plaintiff respectfully submits that his filings are made in good faith and in an effort to assist the Court in reaching a fair and just resolution of this case.

Plaintiff therefore respectfully asks the Court to recognize that his filings are proper responses to issues raised by Defendants and are consistent with federal law and the Federal Rules of Civil Procedure.

A handwritten signature in black ink, reading "Jason Matthew Lynch". The signature is written in a cursive, flowing style. The first name "Jason" is on the left, followed by "Matthew" in the middle, and "Lynch" on the right. The letters are connected, with a large loop for the 'L' in Lynch.