

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

DATE: 05/08/2026 06:51:02 PM

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

JASON MATTHEW LYNCH  
Reg. #07405-510

PLAINTIFF

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

CLAYTON EDWARDS, et al.

DEFENDANTS

**PLAINTIFF'S OBJECTIONS TO PARTIAL RECOMMENDED DISPOSITION**

Comes now Plaintiff Jason Matthew Lynch, proceeding pro se, and respectfully submits the following Objections to the Partial Recommended Disposition entered May 8, 2026, Document 168, and states as follows:

**I. INTRODUCTION**

Plaintiff respectfully objects to the Recommended Disposition denying Plaintiff's Emergency Motions seeking temporary injunctive and protective relief preventing Plaintiff's transfer from Federal Correctional Institution El Reno ("FCI-El Reno") to the White County Detention Center ("WCDC") pursuant to the State Court Pick-Up Order entered in Case No. 73CV-26-287.

The Recommendation improperly minimizes the substantial federal interests implicated by the threatened transfer and incorrectly concludes that the requested relief would not aid or protect this Court's jurisdiction.

The threatened transfer directly impacts:

1. Plaintiff's ability to litigate this pending federal civil-rights action;
2. Plaintiff's access to federal courts;
3. preservation of federal jurisdiction over pending claims and evidence;
4. Plaintiff's federally protected medical treatment and continuity of care;
5. Plaintiff's participation in federally mandated Bureau of Prisons ("BOP") programming;
6. Plaintiff's constitutional right of access to courts; and
7. Plaintiff's safety from retaliation by Defendants who are employed at or connected to WCDC.

For these reasons, Plaintiff respectfully requests that Judge Rudofsky reject the Recommendation and grant temporary injunctive relief or, alternatively, stay enforcement of the state-court transport order pending full review.

2026 MAY 14 A 9 46

TAMMY H. DOWNS

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS  
MAY 14 2026  
By: *Tammy H. Downs* CLERK  
DEP CLERK

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**II. THE RECOMMENDATION ERRONEOUSLY CONCLUDES THAT THE REQUESTED RELIEF DOES NOT AID THIS COURT'S JURISDICTION**

The Recommendation concludes Plaintiff failed to demonstrate how the requested injunction would aid this Court's jurisdiction under:

the All Writs Act, 28 U.S.C. § 1651; and

the Anti-Injunction Act, 28 U.S.C. § 2283.

Plaintiff respectfully objects because the threatened transfer materially interferes with this Court's ability to maintain orderly jurisdiction over this pending federal civil-rights litigation.

This federal action concerns alleged unconstitutional conduct occurring at WCDC involving many of the same individuals who would regain custody and control over Plaintiff if transferred back to White County.

Plaintiff has repeatedly alleged:

retaliation;

interference with legal mail;

denial of access to courts;

denial of medical care;

unconstitutional confinement conditions;

deliberate indifference;

and threats connected to Plaintiff's litigation activities.

Returning Plaintiff to the physical custody and control of the very officials and institutions being sued creates an extraordinary risk of:

retaliation,

interference with ongoing litigation,

restriction of legal materials,

restriction of communication,

destruction or suppression of evidence,

intimidation of witnesses,

and interference with Plaintiff's ability to prosecute this federal action.

Such interference directly affects this Court's jurisdiction and its ability to adjudicate the pending claims fairly and effectively.

Federal courts possess authority under the All Writs Act to issue orders necessary to preserve the integrity of their proceedings and protect litigants from actions that threaten the Court's ability to administer justice.

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III. THE THREATENED TRANSFER CREATES IRREPARABLE HARM

The Recommendation improperly characterizes Plaintiff's concerns as speculative.

Plaintiff respectfully objects because the harms are concrete, immediate, and supported by the factual allegations already before the Court.

Plaintiff previously alleges that while housed at WDCDC he experienced:

denial and interruption of critical HIV medication;

unconstitutional medical care;

retaliation;

interference with legal mail;

denial of grievances;

and unconstitutional conditions of confinement.

The proposed transfer would place Plaintiff back under the authority or influence of individuals directly implicated in this litigation.

This is not speculative fear.

It is grounded in the factual history underlying the very claims already permitted to proceed in this action.

Additionally, Plaintiff is currently engaged in BOP programming, including federally mandated programming tied to:

sentence reduction opportunities;

First Step Act credits;

halfway-house eligibility;

and home-confinement placement.

The forced interruption of such programming constitutes substantial and irreparable harm that cannot later be adequately remedied through monetary damages.

IV. COMITY DOES NOT REQUIRE THIS COURT TO ABSTAIN UNDER THESE EXTRAORDINARY CIRCUMSTANCES

Plaintiff further objects to the Recommendation's reliance upon comity principles.

While Plaintiff acknowledges the importance of comity between sovereign courts, federal courts are not required to abstain where:

constitutional rights are threatened;

irreparable harm is imminent;

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and federal jurisdiction itself is endangered.

Plaintiff is not seeking ordinary interference with state proceedings.

Rather, Plaintiff seeks narrow and temporary relief necessary to:

preserve the integrity of this federal litigation;

prevent retaliation;

protect constitutional rights;

and avoid irreparable injury.

Moreover, Plaintiff has already sought relief within the Arkansas courts and Arkansas Supreme Court, yet the imminent transport order remains active despite the extraordinary constitutional concerns raised.

Without intervention, Plaintiff faces immediate transfer before meaningful judicial review can occur.

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#### V. THE BALANCE OF EQUITIES FAVORS TEMPORARY RELIEF

The balance of equities strongly favors Plaintiff.

Defendants suffer little or no prejudice from maintaining Plaintiff in BOP custody pending resolution of the federal and state proceedings.

By contrast, Plaintiff faces:

potential interruption of medical care;

interruption of federal programming;

retaliation;

restricted legal access;

possible lockdown conditions;

and interference with his ability to litigate this action.

The public interest likewise favors preserving constitutional protections and ensuring access to federal courts free from intimidation or retaliatory custodial manipulation.

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#### VI. CONCLUSION

WHEREFORE, Plaintiff respectfully requests that the District Judge:

1. Reject the Partial Recommended Disposition entered at Document 168;

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2. Grant Plaintiff's Emergency Motions for Temporary Protective Order and Injunctive Relief;
3. Temporarily prohibit Plaintiff's transfer to White County Detention Center pending further review;
4. Alternatively stay enforcement of the state-court transport order until the federal constitutional issues raised herein are fully adjudicated;
5. Grant all other just and proper relief.

Respectfully submitted,

Jason Matthew Lynch  
Reg. #07405-510  
FCI-EI Reno  
Federal Correctional Institution  
EI Reno, Oklahoma

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was mailed to counsel for Defendants on this 8<sup>th</sup> day of May, 2026.

Jason Matthew Lynch  
Plaintiff, Pro Se

