

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

JASON LYNCH

PLAINTIFF

v.

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

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.

**MEDICAL DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE
RESPONSES OUT OF TIME TO PLAINTIFF'S MOTIONS (DOCS. 202-209) AND FOR
AN EXTENSION OF PLAINTIFF'S REPLY DEADLINE**

COMES NOW the Medical Defendants, Turn Key Health Clinics, LLC, Ashley Watts, and Kaitlyn Smith, by and through their counsel of record, and pursuant to Local Rule 6.2, respectfully requests that this Court grant them leave to file their Responses to Plaintiff's multiple motions, Documents ## 202-209, out of time by no later than **August 26, 2026**, and for Plaintiff to receive a similar extension of time to file his Reply brief(s) due to the volume of pleadings and issues involved.

In support of this Request, Defendants state as follows:

1. On July 29, 2026, Plaintiff filed the following motions:
 - a. Reply in Support of Motion to Compel (Doc. 202);
 - b. Motion to Compel for Supplemental Discovery to enter Material Facts into the Record and to Add Additional Defendants (Doc. 203);

- c. Motion to Substitute Newly Identified Doe Defendants, Correct Party Names, Compel Identifying Discovery, Extend the Doe-Identification Deadline, and for such other relief as is just (Doc. 204);
- d. Motion for Limited Extension of Time to Identify and Substitute Doe Defendants and Motion to Compel Targeted Supplemental Identification Response (Doc. 205);
- e. Notice of Disputed Authenticity, apparent Alteration of Records, Forged or Non-Authentic Signature, and Request that Exhibits be entered into Record (Doc. 206);
- f. Motion to Compel Complete Doe-Identification Responses to Substitute Identified Pill-Nurse Defendants for a Limited Extension of Time and Incorporated Brief in Support (Doc. 207);
- g. Notice of Failure to Receive Discovery Responses, Motion to Compel Doe-Identification Discovery and Motion for Extension of Time to Identify Doe Defendants (Doc. 208); and
- h. Notice to the Court regarding Good-Faith Efforts to Obtain Doe-Defendants Identification, Communications with Defense Counsel and Request for Relief (Doc. 209).

2. Counsel for the Medical Defendants was confused and under the belief that the Court's Stand-Down Order (*see* Docs. 155, 160) related to Plaintiff's filings was still in effect and, consequently, was awaiting direction from the Court to file a responsive pleading to Plaintiff's motions, if indicated after initial screening of motions by the Court.

3. Upon further review of the docket in toto this morning, however, defense counsel believes she was mistaken as to the ongoing applicability of the Stand-Down Order in light of the entry of a Scheduling Order (Doc. 172).

4. The responses to Plaintiff's motions filed on July 29, 2026 would have been due last week, on August 12, 2026.

5. Medical Defendants request leave to file a combined response out of time to all of Plaintiff's motions, Docs. 202-209, by no later than **August 26, 2026**.

6. Counsel has conferred with Plaintiff, who does not object to the requested relief but does request that Defendants' motion also request additional time for himself to review Defendants' response brief and prepare his reply brief(s).

7. Defendants do not anticipate this requested extension will have any impact on any other deadlines in this litigation.

WHEREFORE, pursuant to Local Rule 6.2, Defendants seek leave to file a combined response to Plaintiff's Motions (Docs. 202-209) out of time by no later than Wednesday, **August 26, 2026**, and for Plaintiff to also receive an accompanying extension of time to file his Reply brief due to the volume of the issues and motions pending.

Respectfully submitted,

/s/ Alexandra G. Ah Loy

Alexandra G. Ah Loy, OK Bar #31210

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*Attorneys for Defendants Turn Key Health
Clinics, LLC, and Kaitlyn Smith, and
Ashley Watts*

CERTIFICATE OF SERVICE

This is to certify that on the 17th day of August, 2026, I electronically transmitted the above document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Kaylen S. Lewis lewis@joneslawfirm.com

I also certify that I served the following, who is not a registered participant of the ECF System for filing, via first class mail postage prepaid:

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Plaintiff, Pro Se

/s/ Alexandra G. Ah Loy