
Re: Second Request to Update Mailing Address and Supplement Discovery Responses

From Kaylen Lewis <lewis@jowenslawfirm.com>

Date Tue 7/14/2026 8:56 AM

To Jason Lynch <jlynch@abtechcs.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>

Cc Miranda Lawrence <miranda@jowenslawfirm.com>

Mr. Lynch -

I wanted to let you know that I received your email. Due to personal and business commitments, I am out of the office at the beginning of this week but will respond fully later this week when I am able.

Thank you,

Kaylen Lewis
Attorney

Mailing Address: P.O. Box 850

Conway, Arkansas 72033-0850

Physical Address: 1160 Markham Street

Conway, Arkansas 72032

Office: (501) 764-4334

Direct: (501) 764-4420

Fax: (501) 764-9173

lewis@jowenslawfirm.com

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From: Jason Lynch <jlynch@abtechcs.com>

Sent: Monday, July 13, 2026 3:37 AM

To: Kaylen Lewis <lewis@jowenslawfirm.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>

Cc: Miranda Lawrence <miranda@jowenslawfirm.com>

Subject: Re: Second Request to Update Mailing Address and Supplement Discovery Responses

Subject: Re: Second Request to Update Mailing Address and Supplement Discovery Responses

Dear Ms. Lewis,

Thank you for your response and for providing the updated list of names with job titles.

To clarify, I am not seeking every employee's complete work schedule or general job duties. My request is much narrower and is intended solely to identify the remaining Doe Defendants. I am trying to avoid naming individuals who had no interaction with me, which would unnecessarily increase the burden on both the parties and the Court.

The information that would be most helpful is identifying which employees performed specific functions during the period of my incarceration at the White County Detention Center (approximately June 10, 2024, through September 9, 2024). For example:

- Which jailers or deputies conducted pill call in my housing unit during that period.
- Which officers were assigned to my pod and participated in routine operations or shakedowns.
- Which officers worked the "wheel" or control room serving my housing unit.
- Which officers transported or escorted me to court appearances or medical appointments.
- Which officers were assigned to booking, classification, or intake if they interacted with me.
- Any shift rosters, assignment sheets, duty rosters, or similar records that would identify the personnel assigned to those functions during the relevant dates.

I am not requesting every schedule for every employee. Rather, I am seeking enough information to determine which individuals actually interacted with me so I can narrow the list of potential Doe Defendants and amend my complaint accurately.

Additionally, I noticed that the list provided does not include any medical personnel. Because several of my claims involve medical care, I also request the names and positions of all medical staff who worked at or provided medical services to the White County Detention Center during the relevant period, including employees or contractors (such as nurses, nurse practitioners, physicians, medication-pass personnel, or other healthcare providers).

If it is easier, providing the assignment records for the specific dates on which the incidents alleged in my Complaint occurred would also satisfy my request. My goal is simply to identify the correct individuals and avoid naming persons who were not involved.

I appreciate your willingness to clarify my request and look forward to your supplemental response.

Respectfully,

Jason Matthew Lynch



Jason Lynch
Operations Mgr & Network Engineer,
AbTechCs.com

501-605-4481

501-920-2107

Jlynch@abtechcs.com

[6834 Cantrell Road Suite #1183](#)
[Little Rock, AR 72207](#)

[5015633500](https://www.facebook.com/5015633500)



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"Better three hours too soon than a minute too late." - William Shakespeare

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From: Kaylen Lewis <lewis@jowenslawfirm.com>

Sent: Thursday, July 9, 2026 10:19 AM

To: Jason Lynch <jlynch@abtechcs.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>

Cc: Miranda Lawrence <miranda@jowenslawfirm.com>

Subject: Re: Second Request to Update Mailing Address and Supplement Discovery Responses

I have attached an updated list of names with job titles. You also request "duty assignments". Can you explain further what you mean (i.e. shift schedules or job duties)? If you are requesting specific work schedules, can you list specific dates?

Thank you,

Kaylen Lewis
Attorney

Mailing Address: P.O. Box 850

Conway, Arkansas 72033-0850

Physical Address: 1160 Markham Street

Conway, Arkansas 72032

Office: (501) 764-4334

Direct: (501) 764-4420

Fax: (501) 764-9173

lewis@jowenslawfirm.com

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From: Jason Lynch <jlynch@abtechcs.com>

Sent: Thursday, July 9, 2026 9:36 AM

To: Kaylen Lewis <lewis@jowenslawfirm.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>;
rslone@hallboothsmith.com <rslone@hallboothsmith.com>

Subject: Re: Second Request to Update Mailing Address and Supplement Discovery Responses

Just a friendly reminder that I am still waiting for additional and adequate responses that will allow me to name and identify the Doe Defendants.



Jason Lynch

Operations & Network Engineer, Abtechcs.com

 icon 501-605-4481

 icon 501-920-2107

 icon [Jlynch@abtechcs.com](mailto:jlynch@abtechcs.com)

 icon_6834 Cantrell Road Suite #1183
Little Rock, AR 72207

 icon_5015633500

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"Love all, trust a few, do wrong to none." - William Shakespeare

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From: Jason Lynch <jlynch@abtechcs.com>

Sent: Thursday, 02 July 2026 13:49:47

To: Kaylen Lewis <lewis@jowenslawfirm.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>;
rslone@hallboothsmith.com <rslone@hallboothsmith.com>

Subject: Re: Second Request to Update Mailing Address and Supplement Discovery Responses

Understood thank you



Jason Lynch

Operations & Network Engineer, Abtechcs.com

501-605-4481

501-920-2107

jlynch@abtechcs.com

6834 Cantrell Road Suite #1183
Little Rock, AR 72207

5015633500

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From: Kaylen Lewis <lewis@jowenslawfirm.com>

Sent: Thursday, 02 July 2026 13:48:55

To: Jason Lynch <jlynch@abtechcs.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>;
rslone@hallboothsmith.com <rslone@hallboothsmith.com>

Subject: Re: Second Request to Update Mailing Address and Supplement Discovery Responses

I have received your email. I will address your requests and good faith letter by the end of next week.

Thank you,

Kaylen Lewis
Attorney

Mailing Address: P.O. Box 850
Conway, Arkansas 72033-0850
Physical Address: 1160 Markham Street
Conway, Arkansas 72032
Office: (501) 764-4334
Direct: (501) 764-4420
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From: Jason Lynch <jlynch@abtechcs.com>
Sent: Thursday, July 2, 2026 12:51 PM
To: Kaylen Lewis <lewis@jowenslawfirm.com>; Alexandra G. Ah Loy <allieahloy@hallboothsmith.com>;
rslone@hallboothsmith.com <rslone@hallboothsmith.com>
Subject: Second Request to Update Mailing Address and Supplement Discovery Responses

Dear Counsel,

This email serves as my second renewed request regarding both my change of mailing address and the deficiencies in your response to my Limited Discovery Request. My previous email concerning these matters received no response.

First, I again notify you that my mailing address was changed. A Notice of Change of Address was filed with the Court in early May 2026. Despite that filing, your office has continued sending correspondence to the prison, which is no longer my mailing address. Please immediately update your records to reflect the following address:

Jason Matthew Lynch
261 Wilson Loop
Ward, AR 72176

Please ensure that all future correspondence is mailed to this address.

Second, I again request that you supplement your response to my Limited Discovery Request. After reviewing the roster you produced, it remains clear that it is not responsive to the information I specifically requested.

The roster contains only a list of names and does not identify each employee's position, assignment, or job duties within the White County Detention Center. As stated in my discovery request, I requested identifying information sufficient to determine the identities of the remaining Doe Defendants so they may be properly substituted and served.

Simply producing a list of names is insufficient for that purpose. Multiple officers share the same last name, and without job titles or duty assignments, I have no way to determine which individuals were involved in the events alleged in my Complaint. As produced, the roster has little practical value in identifying the remaining Doe Defendants.

At a minimum, I request that you supplement your discovery response by providing the name, job title, and duty assignment of each employee who worked within the White County Detention Center during the relevant time period. I also request that you identify all medical personnel who were employed or working at the facility during that period, as no medical staff could be identified from the roster that was provided.

Please refer back to my original Limited Discovery Request, which clearly sets forth the information sought. Under the Federal Rules of Civil Procedure, parties are required to make a reasonable and good-faith effort to provide complete and meaningful discovery responses. Producing only a list of names without identifying information does not allow me to identify the remaining Doe Defendants or comply with the Court's scheduling order.

Because this is my second request and my first email received no response, I respectfully ask that you address these issues promptly. If I do not receive a response or the requested supplemental discovery, I will have no alternative but to seek appropriate relief from the Court, including an order compelling production and any other relief the Court deems appropriate.

I appreciate your prompt attention to these matters and look forward to your response.

Respectfully,

Jason Matthew Lynch
261 Wilson Loop
Ward, AR 72176



Jason Lynch

Operations & Network Engineer, Abtechcs.com

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Jlynch@abtechcs.com

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