

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

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

MAR 19 2026

TAMMY H. DOWNS, CLERK
By:  DEP CLERK

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

JASON M. LYNCH
Plaintiff

v. Case 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, TURN KEY, DOE 1
Defendants

**PLAINTIFF'S RESPONSE AND OBJECTION TO MEDICAL DEFENDANTS' NOTICE REGARDING SUPPLEMENTAL FILINGS
(ECF 128)**

Plaintiff Jason Matthew Lynch, proceeding pro se, respectfully submits this Response and Objection to the "Medical Defendants' Notice Regarding Plaintiff's Supplemental Filings" (ECF 128) and states as follows:

I. INTRODUCTION

The Medical Defendants' filing is styled as a "Notice," not a motion, and requests no relief from the Court. Instead, the filing attempts to portray Plaintiff's efforts to clarify the record as "procedurally improper."

In reality, Plaintiff's filings were made in good faith to clarify the factual allegations, respond to defenses raised by Defendants, and assist the Court in efficiently resolving this matter.

Federal courts consistently hold that cases should be decided on their merits rather than procedural technicalities, particularly where a litigant is proceeding pro se.

See Haines v. Kerner, 404 U.S. 519 (1972) (pro se pleadings must be liberally construed).

II. DEFENDANTS' NOTICE IS A PROCEDURAL COMPLAINT THAT REQUESTS NO RELIEF

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

Defendants' filing does not move to strike any document, does not request sanctions, and does not seek any ruling from the Court.

Instead, it simply attempts to "preserve objections" to Plaintiff's filings.

Federal courts have repeatedly recognized that filings which seek no relief and merely complain about an opposing party's conduct serve little purpose in advancing the litigation.

If Defendants believed Plaintiff's filings were improper, the appropriate procedure would have been a motion to strike under Federal Rule of Civil Procedure 12(f).

They chose not to do so.

This strongly suggests that Defendants recognize the filings do not actually violate the Federal Rules.

III. PLAINTIFF'S FILINGS ARE PERMISSIBLE AND HELPFUL TO THE COURT

Defendants complain about Plaintiff's filings responding to their Answers.

While Rule 7(a) identifies the standard pleadings allowed in federal court, nothing in the Federal Rules prohibits litigants from filing clarifications, legal memoranda, or responses addressing defenses raised by opposing parties.

Courts possess broad inherent authority to manage their dockets and consider filings that assist in resolving issues before the Court.

See Dietz v. Bouldin, 579 U.S. 40 (2016).

Plaintiff's filings merely addressed the affirmative defenses asserted by Defendants, including immunity and other legal defenses.

Such filings are entirely consistent with Plaintiff's duty to advocate his claims and clarify disputed issues.

IV. PLAINTIFF'S MORE DEFINITE STATEMENT DEMONSTRATES THE RULE 12(e) MOTION IS UNNECESSARY

Defendants also complain about Plaintiff's filing titled "More Definite Statement Regarding Medical Care and Retaliation Claims."

That filing was submitted in good faith to clarify factual allegations and address Defendants' pending Motion for More Definite Statement.

Ironically, Defendants acknowledge in their Notice that Plaintiff possesses the factual information necessary to provide additional detail regarding his claims.

This acknowledgement effectively undermines their Rule 12(e) motion.

A motion for more definite statement is appropriate only when a pleading is so vague or ambiguous that a party cannot reasonably prepare a response.

See Federal Rule of Civil Procedure 12(e).

Here, Defendants have already:

Filed Answers to the complaint

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

Asserted numerous affirmative defenses
Demonstrated their ability to respond to Plaintiff's allegations

Because Defendants were clearly able to understand the complaint well enough to answer it, their Rule 12(e) motion is unnecessary and should be denied.

V. PLAINTIFF'S FILINGS DO NOT PREJUDICE DEFENDANTS

Defendants do not claim that:

Plaintiff violated any Court order
Plaintiff caused delay
Plaintiff prejudiced their ability to defend the case

Instead, they simply express dissatisfaction with Plaintiff's litigation efforts.

Such generalized complaints are insufficient to justify limiting a litigant's ability to present facts and legal arguments.

VI. PLAINTIFF IS A PRO SE INCARCERATED LITIGANT

Plaintiff is an incarcerated litigant proceeding without legal counsel.

The Supreme Court and the Eighth Circuit have repeatedly held that courts must construe pro se filings liberally and avoid dismissing claims based on technical procedural issues.

See:

Erickson v. Pardus, 551 U.S. 89 (2007).
Stone v. Harry, 364 F.3d 912 (8th Cir. 2004).

Plaintiff's filings reflect an effort to assist the Court, clarify the factual record, and address issues raised by Defendants.

They should therefore be considered in the interest of justice.

VII. DEFENDANTS' NOTICE APPEARS TO BE A DELAY TACTIC

Finally, Plaintiff respectfully notes that Defendants' filing does not advance the litigation in any meaningful way.

Instead, it attempts to focus attention on technical procedural complaints rather than the serious constitutional violations alleged in the complaint, including deliberate indifference to Plaintiff's medical needs and retaliation.

Courts routinely discourage such tactics where they serve only to delay the progress of litigation.

VIII. CONCLUSION

Plaintiff's filings were submitted in good faith to clarify the record, respond to defenses raised by Defendants, and assist the Court in efficiently resolving this case.

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

They do not violate any rule or order of this Court and have not prejudiced Defendants in any way.

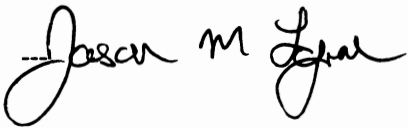
Accordingly, Plaintiff respectfully requests that the Court:

1. Take no action on Defendants' Notice (ECF 128);
2. Allow Plaintiff's filings to remain on the docket; and
3. Deny any attempt to characterize Plaintiff's filings as procedurally improper.

Respectfully submitted,

Jason Matthew Lynch
Reg. No. 07405-510
FCI El Reno
Inmate Mail/Parcels
PO Box 1500
El Reno, OK 73036

Plaintiff, Pro Se

A handwritten signature in black ink that reads "Jason M. Lynch". The signature is written in a cursive, flowing style.