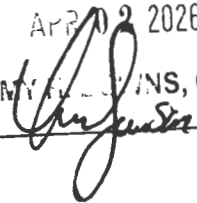


2026 APR -2 A 9:45

SUBJECT: RE: Request to Placed Under Seal of the Court
DATE: 03/29/2026 10:51:02 PM

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

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
APR 02 2026
TAMMY J. JONES, CLERK
By:  DEP. CLERK

JASON MATTHEW LYNCH
Reg. #07405-510
Plaintiff, Pro Se

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

WHITE COUNTY JAIL, et al.
Defendants

REQUEST TO BE PLACED UNDER SEAL OF THE COURT

REQUEST TO BE PLACED UNDER SEAL OF THE COURT

REQUEST TO BE PLACED UNDER SEAL OF THE COURT

PLAINTIFF'S MOTION FOR LEAVE TO SERVE TARGETED REQUESTS FOR ADMISSIONS AND INTERROGATORIES

Plaintiff, Jason Matthew Lynch, proceeding pro se, respectfully submits this Motion and requests that this filing be placed under seal of the Court and not disclosed to Defendants at this time.

Mr. Lynch makes this request in good faith and for the protection of a legitimate litigation strategy. Disclosure of the contents of this motion to Defendants prior to the appropriate time would provide them with advance notice of a structured evidentiary approach designed to obtain admissions central to Plaintiff's claims, thereby allowing Defendants the opportunity to coordinate responses, avoid accountability, or otherwise undermine the integrity of the discovery process.

Mr. Lynch believes that through a carefully tailored set of 25 Requests for Admissions and 25 Interrogatories (and up to 35 for supervisory or command-level Defendants), he can compel Defendants to admit to key facts underlying his claims. This structured approach is designed to:

- Establish a clear pattern of conduct;
- Lock Defendants into sworn positions;
- Expose contradictions and bad faith; and
- Streamline the case toward summary judgment or default, where appropriate.

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Mr. Lynch respectfully submits that this strategy will conserve judicial resources, reduce unnecessary motion practice, and potentially bring this matter to a just and efficient resolution without prolonged litigation.

Importantly, Mr. Lynch is not requesting permission to serve discovery early. Instead, he seeks only leave from the Court to utilize a structured set of 25 to 35 targeted discovery requests per Defendant once formal discovery begins, consistent with the Federal Rules of Civil Procedure.

Mr. Lynch further states that the following pages of this motion will explain the legal basis and structure of this request in detail.

Due to the nature of this strategy, it is imperative that this motion remain sealed until such time as discovery is underway. Premature disclosure would defeat the purpose of the request and provide Defendants with an unfair tactical advantage.

Finally, should the Court decline to allow the expanded number of discovery requests (i.e., up to 35 for supervisory Defendants), Mr. Lynch respectfully requests that this motion be stricken in its entirety immediately upon denial, rather than partially disclosed or implemented in a manner that compromises the intended strategy.

Respectfully submitted,

/s/ Jason Matthew Lynch
Jason Matthew Lynch
Reg. #07405-510
FCI El Reno
Federal Correctional Institution
P.O. Box 1500
El Reno, OK 73036
Plaintiff, Pro Se

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