UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Theresa Kennedy and John Plummer, individually and for others similarly situated, *Plaintiffs*, v. City of Chicago, *Defendant*.	Case No. 20-cv-1440 Hon. Thomas M. Durkin

DEFENDANT CITY OF CHICAGO'S RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION FOR RECONSIDERATION

Plaintiffs fail to carry their heavy burden in demonstrating that this Court committed a "manifest error of fact" that warrants reconsideration. In this putative class action lawsuit, Plaintiffs claim, in relevant part, that the Chicago Police Department's ("CPD") Special Order S02-12-06 (the "CPD Special Order") violates the Equal Protection Clause of the Fourteenth Amendment because it treats people arrested on Cook County warrants differently, depending on: (1) whether the warrant was issued outside the City of Chicago, and (2) the day of the week on which the arrest occurred. In their Motion for Reconsideration (Dkt. 189) (the "Motion for Reconsideration" or the "Motion"), Plaintiffs ask this Court to reconsider the portion of its April 29, 2024 order dismissing Plaintiffs' Equal Protection claims in part, in which the Court concluded that the City's alleged differing treatment of persons arrested on warrants issued within Cook County but outside of Chicago is supported by a rational basis.

Plaintiffs' Motion for Reconsideration should be denied for two reasons. First, the CPD Special Order is entitled to a presumption of rationality that Plaintiffs never expressly challenged in response to the City's prior motion for judgment on the pleadings pursuant to Federal Rule of

Civil Procedure 12(c). Plaintiffs previously made no attempt to negate that a rational basis exists for the CPD Special Order, and the instant Motion for Reconsideration is the improper vehicle for Plaintiffs to raise such arguments now. Moreover, the rational basis standard is highly deferential to the government, and the City has proffered multiple rational bases for the CPD Special Order. Plaintiffs' Motion for Reconsideration focuses exclusively on factual distinctions between the "LEADS" and "CLEAR" systems used by CPD. Plaintiffs ignore, however, the City's broader argument that CPD may conceivably need to coordinate with non-Chicago police departments to verify warrants issued outside of Chicago, which provides a rational basis for the differing treatment of persons arrested on warrants issued within Cook County but outside of Chicago.

Second, the City's subsequent, now-pending Rule 12(c) motion moots Plaintiffs' Motion for Reconsideration and provides a further rational basis for the CPD Special Order. Circuit Court of Cook County Amended General Order 2004-02 (the "Circuit Court General Order") disposes of Plaintiffs' Equal Protection claims in their entirety. It requires both classifications of persons addressed in the CPD Special Order (persons arrested on warrants issued outside of Chicago and persons arrested on weekends and holidays) to be brought to Central Bond Court. Because the Circuit Court General Order—not the CPD Special Order—is the "moving force" behind any alleged constitutional violation, and because the Circuit Court General Order is a state-law command that the City is compelled to follow, Plaintiffs have no viable *Monell* claim against the City. The Motion for Reconsideration must therefore be denied as moot. As a state-law command with which the City must comply, the Circuit Court General Order provides an additional rational basis for the alleged differing treatment of persons arrested on Cook County warrants issued outside of Chicago. Plaintiffs' Motion for Reconsideration should accordingly be denied.

I. BACKGROUND

The CPD Special Order that is the subject of Plaintiffs' constitutional challenge provides that the following persons will be transported to Central Bond Court: (1) "all persons arrested on a warrant outside of the First Municipal District [i.e., Chicago] and no local charges," and (2) "all persons arrested on all warrants on Saturday, Sunday, and court holidays." CPD Special Order S06-12-02, § IV(B)(3)(a), (c).[1] Plaintiffs claim that the CPD Special Order prohibits individuals arrested on non-Chicago warrants and on Saturdays, Sundays, and court holidays from posting bond at the police station. (*See* Dkt. 56 ¶ 9.) Therefore, they allege, the CPD Special Order violates the Fourth and Fourteenth Amendments because it results in unreasonable post-arrest detention and unlawfully discriminates.[2] (*Id.* ¶ 12.)

On April 29, 2024, this Court granted in part and denied in part the City's prior motion for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c) (the "November 2023 Rule 12(c) Motion"). (Dkt. 184.) This Court concluded that Plaintiffs' Fourth Amendment claim was foreclosed by the Seventh Circuit's decision in *Alcorn v. City of Chicago*, 83 F.4th 1063 (7th Cir. 2023), which held that the CPD Special Order does not violate the Fourth Amendment, as federal law does not prohibit presenting an arrestee to a local judge within 48 hours of arrest.. (Dkt. 184 at 3.) This Court also concluded that the City was entitled to judgment on the pleadings on

[1] The Circuit Court of Cook County is comprised of six judicial districts within Cook County, Illinois. *See* Circuit Court of Cook County, Organization of the Court, https://www.cookcountycourt.org/about/organization-court. The "First Municipal District" consists of courts of the Circuit Court of Cook County that are located within the City of Chicago. *Id.*; (Dkt. 56 ¶ 8). Herein, the City refers to the first category of persons addressed in the Special Order—"all persons arrested on a warrant outside of the First Municipal District and no local charges"—as "non-Chicago arrestees."

[2] This Court previously held on December 1, 2022, that persons arrested on warrants issued outside of Cook County have no viable constitutional claim because Circuit Court of Cook County General Administrative Order No. 2015-06 ("GAO 2015-06") "plainly requires the City to bring to bond court persons arrested on a warrant issued outside of Cook County." (Dkt. 136 at 5.) Accordingly, Plaintiffs' Equal Protection claims are based upon the alleged differing treatment of individuals: (1) arrested within Cook county but outside the First Municipal District, and (2) arrested on Saturdays, Sundays, or court holidays.

Plaintiffs' Fourteenth Amendment Equal Protection claim based on the differing treatment of non-Chicago arrestees because there existed a justification that was "conceivably and rationally related to the legitimate purpose of ensuring that non-Chicago warrants are properly administered." (Dkt. 184 at 4.) Specifically, this Court reasoned, unlike Chicago warrants, "non-Chicago warrants cannot be validated through [CPD's] 'CLEAR' system." (*Id.* at 5.) As to Plaintiff's Fourteenth Amendment Equal Protection claim based on the day of the week on which the arrest occurred, however, the Court concluded there was no "conceivable reason for the Policy's discrimination among arrestees." (*Id.* at 6.) The Court accordingly dismissed all claims except the Equal Protection claims based on the days of the week the arrests occurred.

Plaintiffs now seek reconsideration of this Court's decision, claiming that there is no rational reason for the differing treatment of non-Chicago arrestees, as CLEAR is not used to verify arrest warrants, and has been adopted by many municipalities within in Cook County.[3] (*See* Dkt. 189 at 5-9.)

II. LEGAL STANDARD

Motions for reconsideration are disfavored and the movant "bears a heavy burden." *Patrick v. City of Chicago*, 103 F. Supp. 3d 907, 911-12 (N.D. Ill. 2015). The limited purpose of a motion for reconsideration is to "correct manifest errors of law or fact or to present newly discovered evidence." *Zurich Cap. Markets Inc. v. Coglianese*, 383 F. Supp. 2d 1041, 1045 (N.D. Ill. 2005) (quotation marks omitted). A "manifest error" is not demonstrated by the disappointment of the losing party. *Oto v. Metro. Life Ins. Co.*, 224 F.3d 601, 606 (7th Cir. 2000). Further, a motion

[3] Plaintiffs previously asserted in the Parties' Joint Status Report that they intended to seek reconsideration of the Court's finding "that there is a rational basis for the portion of the City's policy that "allows people arrested on Chicago warrants that specify the bond amount to post bond on weekdays but not weekends." (Dkt. 186 ¶ 2.) The City assumes that Plaintiffs' statement was an error, as Plaintiffs present no such argument.

for reconsideration is not an appropriate vehicle for "rehashing previously rejected arguments or arguing matters that could have been heard during the pendency of the previous motion." *Caisse Nationale de Credit Agricole v. CBI Indus., Inc.*, 90 F.3d 1264, 1270 (7th Cir. 1996). Because of this exacting standard, "issues appropriate for reconsideration rarely arise, and motions for reconsideration should be equally rare." *Christine C. v. Saul*, No. 19-CV-1981, 2021 WL 4083415, at *1 (N.D. Ill. Jan. 4, 2021) (quotation marks omitted).

III. ARGUMENT

There is no dispute that rational basis review governs Plaintiffs' Equal Protection claims under the Fourteenth Amendment. (*See* Dkt. 184 at 4.) The rational basis standard is "highly deferential to the government." *Hope v. Comm'r of Ind. Dep't of Corr.*, 66 F.4th 647, 650 (7th Cir. 2023). A government classification will not be set aside "if any state of facts reasonably may be conceived to justify it." *See Wroblewski v. City of Washburn*, 965 F.2d 452, 459-60 (7th Cir. 1992); *see also Hope*, 66 F.4th at 650 (providing that if a court can "hypothesize a sound reason for the classification," the policy survives). A rational basis "may be based on rational speculation unsupported by evidence or empirical data." *Srail v. Vill. of Lisle, Ill.*, 588 F.3d 940, 947 (7th Cir. 2009) (quoting *F.C.C. v. Beach Commc'ns, Inc.*, 508 U.S 307, 315 (1993)).

A government policy or regulation such as the CPD Special Order is entitled to a strong presumption of validity, and the party challenging the regulation "bears the burden of negating 'every conceivable basis which might support it.'" *Foxxxy Ladyz Adult World, Inc. v. Vill. of Dix*, 779 F.3d 706, 720 (7th Cir. 2015) (quoting *Beach*, 508 U.S. at 314-15); (*see also* Dkt. 184 at 4). That is, on a motion for judgment on the pleadings, it is the plaintiff's burden to "allege facts to overcome the presumption of rationality that applies to government classifications." *See Flying J Inc. v. City of New Haven*, 549 F.3d 538, 546 (7th Cir. 2008); *see also, e.g., Little Arm Inc. v.*

Adams, 13 F. Supp. 3d 893, 912 (S.D. Ind. 2014) (granting Rule 12(c) motion where plaintiffs failed to overcome "the presumption of rationality" that applies to government classifications). Plaintiffs failed to meet that burden, both in their response to the November 2023 Rule 12 Motion or now in their Reconsideration Motion.

Plaintiffs' Motion should be denied. The time for Plaintiffs to assert that no rational basis exists for the City's alleged differing treatment of non-Chicago arrestees has come and gone. The CPD Special Order is entitled to a presumption of validity, and Plaintiffs failed to explain in their response to the November 2023 Rule 12(c) Motion why that presumption is overcome. Their attempt to use the Motion for Reconsideration to argue that no rational basis exists for the differing treatment of non-Chicago arrestees should be rejected. Moreover, the City has established that a rational basis exists for the CPD Special Order, both because non-Chicago warrants may require coordination between CPD and other law enforcement agencies, and because, as asserted in the City's Pending Rule 12(c) Motion, the procedures set forth in the CPD Special Order are compelled the Circuit Court General Order. Further, the City's pending Rule 12(c) Motion is dispositive of Plaintiffs' Equal Protection claims in their entirety, such that Plaintiffs' Motion for Reconsideration is moot.

A. The Motion should be denied because Plaintiffs failed to argue previously that no rational basis exists for the alleged differing treatment of non-Chicago arrestees.

As an initial matter, the Motion should be denied because Plaintiffs improperly use it to argue matters they could have argued during the pendency of the City's November 2023 Rule 12(c) Motion. In moving for judgment on the pleadings, the City argued, in part, that Plaintiffs failed to allege membership in any protected class, and that the CPD Special Order satisfied rational basis review such that Plaintiffs' Equal Protection claims should be dismissed. (*See* Dkt. 168 at 12-13.) In response, Plaintiffs did not argue that there was no rational basis for the alleged

differing treatment of non-Chicago arrestees, or of persons arrested on Saturdays, Sundays, and court holidays. (*See* Dkt. 175 at 13-15.) Instead—in an effort to recast their deficient pleading—Plaintiffs merely argued that "class of one" discrimination claims are a viable subset of intentional discrimination claims that likewise require a rational basis to justify differing treatment. (*Id.* at 15.) Plaintiffs failed, however, to explain why no rational basis existed for the alleged differing treatment of either: (1) non-Chicago arrestees, or (2) persons arrested on Saturdays, Sundays, and court holidays. (*See id.* at 13-15.) Accordingly, Plaintiffs failed to show why the presumption of rationality that applies to government regulations such as the CPD Special Order was overcome.[4] *See Flying J*, 549 F.3d at 546.

For the first time in the Motion for Reconsideration, Plaintiffs argue that the "City's differential treatment of persons arrested on warrants issued in Cook County outside of Chicago 'does not rest upon any reasonable basis, but is essentially arbitrary'" and does not further any legitimate state interest because there is not a "rational reason for the difference." (Dkt. 189 at 12.) This argument was entirely absent from Plaintiffs' response to the November 2023 Rule 12(c) Motion. (*Compare id.* with Dkt. 175 at 13-15.) Because a motion for reconsideration is not the appropriate vehicle for "arguing matters that could have been heard during the pendency of the previous motion," *Caisse*, 90 F.3d at 1270, Plaintiffs' Motion for Reconsideration should be denied.

Plaintiffs use their 12-page Motion to argue that there can be no rational basis for the differing treatment of non-Chicago arrestees because the statewide LEADS system, not CLEAR, is readily used to validate most warrants issued anywhere in the state of Illinois. (*See* Dkt. 189 at

[4] As the City argued in its reply to the November 2023 Rule 12(c) Motion, Plaintiffs' amended complaint contained no allegations suggesting that Plaintiffs intended to pursue class-of-one claims. (Dkt. 179 at 11-12.) Plaintiffs used their Rule 12(c) Response to shore up their deficient pleading, but failed to explain why the presumption of rationality was overcome.

5-8.) Plaintiffs claim that they could have not raised their argument regarding CLEAR earlier because the City first mentioned CLEAR in its reply to the November 2023 Rule 12(c) Motion. (*Id.* at 10.) Even so, as the party challenging the CPD Special Order, it was Plaintiffs' burden to argue that no rational basis exists for the CPD Special Order in response to the November 2023 Rule 12(c) Motion. *See Foxxxy*, 779 F.3d at 720 (party challenging regulation bears the burden of negating "every conceivable basis which might support it" (quotation marks omitted)); *see also Flying J*, 549 F.3d at 546. Plaintiffs failed to do so here. This Court should not permit Plaintiffs to use their Motion for Reconsideration to argue for the first time why the CPD Special Order lacks a rational basis for the alleged differing treatment of non-Chicago arrestees. The Motion should be denied for this reason alone.

B. The Motion should be denied because a rational basis exists for the alleged differing treatment non-Chicago arrestees.

As this Court correctly concluded, a presumption of rationality attaches to the CPD Special Order. (*See* Dkt. 184 at 5.) For the reasons set forth above, Plaintiffs failed to show why that presumption is overcome when responding to the City's November 2023 Rule 12(c) Motion. But even if the presumption of rationality did not apply, Plaintiffs' belated challenge to the CPD Special Order still fails because a rational basis exists for the alleged differing treatment of Chicago and non-Chicago arrestees.

1. A rational basis exists for the alleged differing treatment of non-Chicago arrestees because CPD may need to coordinate with outside law enforcement agencies.

Plaintiffs' Motion for Reconsideration fixates on this Court's conclusion that the CPD Special Order is rationally related to the "legitimate purpose of ensuring that non-Chicago warrants are properly administered" because "unlike Chicago warrants, non-Chicago warrants cannot be validated through [CPD's] 'CLEAR' system." (*See* Dkt. 184 at 10.) The City acknowledges that

LEADS is a tool used by CPD verify warrants. Nevertheless, Plaintiffs ignore the City's broader argument that warrants issued in other jurisdictions—even within Cook County—may sometimes require coordination between CPD and other police departments. (*See* Dkt. 179 at 10-11.) As Plaintiffs point out, LEADS is used for "initial verification" of warrants. (Dkt. 189 at 6 (quoting CPD Special Order § IV(A)(2)(b)). Here, a rational basis for the alleged differing treatment of non-Chicago arrestees exists because, in the event that additional information is required from a non-Chicago jurisdiction other than that which can be obtained through LEADS, coordination with the non-Chicago jurisdiction may be necessary. Moreover, it is possible that during the relevant time period, not all police departments in Illinois—or even Cook County—necessarily utilized the LEADS system, as doing so requires law enforcement agencies to apply for access and imposes administrative burdens on its member organizations. *See, e.g.*, 20 Ill. Admin. Code § 1240.30; *id.* § 1240.60. Being unable to verify a single warrant from a police department that cannot access the LEADS database would thus justify CPD's decision to bring those persons arrested on non-Chicago warrants to Central Bond Court. This is sufficient to establish a rational basis for the treatment of non-Chicago arrestees. While Plaintiffs spill much ink in discussing the history and purpose of LEADS as a warrant verification tool, the rational basis test "is not subject to courtroom factfinding," and a governmental classification "must be upheld against equal protection challenge if there is *any* reasonably conceivable state of facts that could supply a rational basis for the classification." *Smith v. City of Chicago*, 457 F.3d 643, 651 (7th Cir. 2006) (quoting *Beach*, 508 U.S. at 315 and *Heller v. Doe*, 509 U.S. 312, 320 (1993)).

Here, Plaintiffs disregard that such coordination between law enforcement agencies "is conceivably and rationally related to the legitimate purpose of ensuring that non-Chicago warrants are properly administered." (*See* Dkt. 184 at 5.) Because a sound reason for the CPD Special Order

may reasonably be conceived, *see Wroblewski*, 965 F.2d at 459-60; *Hope*, 66 F.4th at 650, the Motion for Reconsideration should be denied.

2. The City's Pending Rule 12(c) Motion moots the Motion for Reconsideration and provides an additional rational basis for the alleged differing treatment of non-Chicago arrestees.

In addition to coordination between law enforcement agencies, the City has established in its Pending Rule 12(c) Motion an additional rational basis for the alleged differing treatment of non-Chicago arrestees—adherence to the Circuit Court General Order. Promulgated in 2004 by the Presiding Judge of the First Municipal District of the Circuit Court of Cook County, the Circuit Court General Order governs the processes and procedures regarding "Cook County Warrants." (*See* Dkt. 188-1 (Circuit Court General Order).)[5] The Circuit Court General Order provides, in relevant part, that CPD shall "transfer the individual arrested on the Warrants," as follows:

> (1) Individuals with Warrants returnable within the First Municipal District are to be transported directly to the Branch Court on regularly-scheduled court date(s); on Saturday, Sunday, [sic] Holidays the Warrants are returnable to Central Bond Court.
>
> (2) Individuals with Warrants returnable to either the Criminal Court or a Municipal District (2nd, 3rd, 4th 5th, 6th) other than the First Municipal District are to be transported directly for their initial court appearance to 2600 South California Avenue, Chicago, Illinois.[6]

(*Id.*) Subsection 2 of the Circuit Court General Order requires CPD to present persons arrested within Cook County but outside the First Municipal District (i.e., on a warrant returnable to "a Municipal District (2nd, 3rd, 4th 5th, 6th) other than the First Municipal District") to 2600 South

[5] The Circuit Court General Order is also posted to the Circuit Court of Cook County website and available at https://ocj-web-files.s3.us-east-2.amazonaws.com/orders/1M-GO-2004-02.pdf?VersionId=b1Mm6IBp52nmAm0W_5.P0SHmdyBTRIM9.

[6] Central Bond Court is located at the George N. Leighton Criminal Court Building, 2600 South California Avenue, Chicago, Illinois. (Dkt. 56 ¶ 7.)

California Avenue, where Central Bond Court is located. (*See* Dkt. 56 ¶ 7.) The CPD Special Order is consistent with and adheres to the Circuit Court's General Order.

As a threshold matter, the City's Pending Rule 12(c) Motion—if granted by this Court—moots Plaintiffs' Motion for Reconsideration because it disposes of Plaintiffs' Equal Protection claims in their entirety. Although the Pending Rule 12(c) Motion necessarily focuses on Plaintiffs' Equal Protection claim based on the day-of-the-week classification given the Court's prior ruling (*see* Dkt. 184 at 5), it is dispositive of Plaintiffs' Equal Protection claim based on the non-Chicago arrestee classification as well. As explained in greater detail in the Pending Rule 12(c) Motion, the Circuit Court General Order is dispositive of Plaintiffs' Equal Protection claims for two reasons: (1) because the Circuit Court General Order, not the CPD Special Order, is the "moving force" behind any alleged constitutional violation, and (2) because the Circuit Court General Order is a state-law command that the City is compelled to follow. (*See* Dkt. 188 at 7-13.) Under either scenario, the City cannot incur *Monell* liability. (*See id.*). This is because where, as here, a municipality acts pursuant to state law, "it is the policy contained in that state or federal law, rather than anything devised or adopted by the municipality, that is responsible for the injury," and because a municipality cannot be held liable for acts undertaken under the command of state law. *Bethesda Lutheran Homes & Servs., Inc. v. Leean*, 154 F.3d 716, 718 (7th Cir. 1998); *see also* (Dkt. 136 at 5-6 (concluding that a different Circuit Court General Administrative Order qualified as a 'command' of state law" for purposes of the *Bethesda Lutheran Homes* decision). Accordingly, this Court should grant the Pending Rule 12(c) Motion, and dismiss Plaintiffs' Equal Protection claims in their entirety, rendering Plaintiffs' Motion for Reconsideration moot.

Moreover, the City's adherence to the Circuit Court General Order provides an additional rational basis for the alleged differing treatment of non-Chicago arrestees. The Circuit Court General Order requires CPD to transport "Individuals with Warrants returnable within the First

Municipal District" to Branch Court on a regularly scheduled Court date. (*See* Dkt. 88-1.) But it prescribes different treatment for persons arrested on non-Chicago warrants returnable to the Second, Third, Fourth Fifth, or Sixth Districts within Cook County. Individuals arrested on non-Chicago warrants returnable in these Cook County juridical districts "are to be transported directly for their initial court appearance to 2600 South California Avenue, Chicago, Illinois," that is, to Central Bond Court. (*See id.*) The Seventh Circuit and courts within this District have repeatedly upheld the constitutionality of municipal policies that, like the CPD Special Order here, merely enforce state law. *Surplus Store & Exch., Inc. v. City of Delphi*, 928 F.2d 788, 791 (7th Cir. 1991) ("It is difficult to imagine a municipal policy more innocuous and constitutionally permissible, and whose causal connection to the alleged violation is more attenuated, than the 'policy' of enforcing state law."); *Bethesda Lutheran Homes*, 154 F.3d at 718 (upholding the constitutionality of municipal policies that merely enforce state law "has the virtue of minimizing the occasions on which federal constitutional law, enforced through section 1983 puts local government at war with state government"); *see also* Dkt 136 at 5-8 (concluding that certain former plaintiffs arrested on warrants outside of Cook County had no viable *Monell* claim because GAO 2015-06 requires persons arrested on warrants outside of Cook County to be brought to Central Bond Court, and the CPD Special Order merely adheres to this state-law command).

As set forth in the Pending Rule 12(c) Motion, numerous other courts have likewise held that relying on state law, including court orders, provides a rational basis for alleged government "discrimination" under the Equal Protection Clause. *See, e.g.*, *Texas v. Ysleta del Sur Pueblo*, 367 F. Supp. 3d 596, 613 (W.D. Tex. 2019) (holding the government actor possessed a rational basis for the challenged act because he endeavored to follow a federal law); *Santiago v. Clarke*, No. 11-cv-1024, 2013 WL 501423, at *3, 8 (E.D. Wis. Feb. 11, 2013) (dismissing Equal Protection claim

where the challenged government action was performed to achieve "compliance with the court order"); *King v. Twp. of E. Lampeter*, 17 F. Supp. 2d 394, 421 (E.D. Pa. 1998) (dismissing Equal Protection claim where challenged actions "were taken in accordance with a valid court order," satisfying rational basis review).

Here, the City's alleged differing treatment of non-Chicago arrestees is firmly supported by a rational basis because it is required by the Circuit Court General Order, which mandates that persons arrested on warrants returnable to the Second, Third, Fourth, Fifth, and Sixth District be transported by CPD to 2600 South California Avenue. (*See* Dkt. 88-1.) Because the City has proffered this additional rational basis for the CPD Special Order, this Court should exercise its discretion to deny Plaintiffs' Motion for Reconsideration.

IV. CONCLUSION

For all these reasons, Plaintiffs' Motion for Reconsideration should be denied.

Dated: July 8, 2024

Respectfully submitted,

CITY OF CHICAGO

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