

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

Human Rights Defense Center v. John Baldwin, et al.

Human Rights Defense Center · No. 18-cv-01136 · Decided January 16, 2026

SUMMARY

The court partially granted and partially denied defendants’ motion to reconsider its summary judgment ruling in Human Rights Defense Center’s action against current and former Illinois Department of Corrections employees under 42 U.S.C. § 1983. The court upheld declaratory and injunctive relief concerning prior mail policies and its determination that portions of the 2022 policy were unconstitutionally vague. The court amended the prior order to grant individual-capacity summary judgment to several defendants, including Baldwin, based on insufficient evidence of the required culpable mental state.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Mary M. Rowland
JURISDICTION	United States District Court for the Northern District of Illinois
DECIDED	January 16, 2026
DOCKET	18-cv-01136
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under the federal standard for reconsideration of the court's prior summary-judgment opinion. The court granted the motion in part and denied it in part.
STANDARD OF REVIEW	A motion to reconsider is proper only upon newly discovered evidence or a manifest error of law or fact. Manifest error requires a patent misunderstanding of a party, a decision outside the adversarial issues, or an error of apprehension rather than reasoning; reconsideration is an extraordinary and rare remedy.
PRECEDENTIAL VALUE	Unknown

TOPICS

motion for reconsideration

summary judgment

section 1983

first amendment

procedural due process

PRACTICE AREAS

constitutional law

civil rights

prisoners rights

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether reconsideration was warranted because claims for declaratory and injunctive relief concerning the 2006 and 2019 policies were moot.
2. Whether the Eleventh Amendment barred the previously awarded declaratory and injunctive relief.
3. Whether the 2022 Administrative Directive's Security Threat Group and Catch-All provisions were unconstitutionally vague on their face.
4. Whether individual defendants who acted only negligently or with no more than gross negligence could be liable for damages under 42 U.S.C. § 1983.
5. Whether Sullivan was entitled to summary judgment on HRDC's First Amendment claim based on the absence of evidence that he acted with the required culpable mental state.
6. Whether Jeffreys was entitled to summary judgment on HRDC's Fourteenth Amendment claim based on the absence of evidence that he knew of and facilitated, approved, condoned, or deliberately disregarded the alleged violation.

HOLDINGS

1. Reconsideration is warranted only upon newly discovered evidence or a manifest error of law or fact, and it may not be used to raise arguments or evidence that could have been presented before judgment.
2. HRDC's claims for declaratory and injunctive relief concerning the 2006 and 2019 Administrative Directives were not moot because the alleged violations, including denial of notice and appeal rights, remained uncured and could continue.
3. The Eleventh Amendment did not bar the declaratory or injunctive relief awarded because the case involved continuing violations and there was no asserted end run around the Amendment's bar on damages or restitution.
4. The 2022 Administrative Directive's Security Threat Group and Catch-All provisions were unconstitutionally vague because their interaction permitted multiple equally plausible interpretations and did not give publishers fair notice of what content would be prohibited.
5. An individual defendant cannot be liable under § 1983 for damages without the required culpable mental state; negligence or gross negligence alone is insufficient. Hansbro, Carter, Scott, Watson, Anderson, and Baldwin were therefore entitled to summary judgment on individual-capacity damages claims.
6. Sullivan was entitled to summary judgment on HRDC's First Amendment claim because the record did not permit a reasonable factfinder to conclude that he knew of and facilitated, approved, condoned, or deliberately disregarded the relevant censorship.

7. Jeffreys was entitled to summary judgment on HRDC's Fourteenth Amendment claim because no reasonable jury could find that he had the required culpable mental state based on the evidence of at most one unnotified censorship during his tenure.

KEY QUOTATIONS

“a motion to reconsider is proper only when “the Court has patently misunderstood a party, or has made a decision outside the adversarial issues presented to the Court by the parties, or has made an error not of reasoning but of apprehension.”” (Legal Standard)

“When “[p]ersons of common intelligence would be required to guess at a phrase’s meaning and differ as to how [a] regulation should be enforced,” that regulation is impermissibly vague.” (Analysis III)

“In a Section 1983 claim, a culpable state of mind is an essential element of liability.” (Analysis IV.a)

“For the stated reasons, Defendants’ motion for reconsideration [357] is granted in part and denied in part.” (Conclusion)

FACTUAL BACKGROUND

HRDC challenged IDOC policies governing censorship and review of mailed publications, including the 2006, 2019, and 2022 Administrative Directives. Under the prior policies, HRDC allegedly was denied notice of censorship decisions and opportunities to appeal, including for PLN Vol. 27, No. 7. The 2022 directive contained Security Threat Group and Catch-All provisions governing prohibited content, and the record concerned the mental states and personal involvement of individual IDOC officials in alleged censorship and notice failures.

PROCEDURAL HISTORY

Human Rights Defense Center sued 22 current or former Illinois Department of Corrections employees under 42 U.S.C. § 1983, challenging prison mail-publication review policies under the First and Fourteenth Amendments. The court previously granted in part and denied in part the parties' cross-motions for summary judgment. Defendants then moved for reconsideration of that ruling. The court amended its prior order to grant summary judgment to specified defendants on individual-capacity claims while leaving certain facial challenges and a due-process claim unresolved.

DISPOSITION

other

CASES CITED

- *Harrington v. City of Chicago*, 433 F.3d 542, 546 (7th Cir. 2006)
- *Bank of Waunakee v. Rochester Cheese Sales, Inc.*, 906 F.2d 1185, 1191 (7th Cir. 1990)
- *Bordelon v. Chicago School Reform Board of Trustees*, 233 F.3d 524, 529 (7th Cir. 2000)
- *Tobin for Governor v. Illinois State Board of Elections*, 268 F.3d 517, 528 (7th Cir. 2001)
- *Prison Legal News v. Federal Bureau of Prisons*, 944 F.3d 868, 882 (10th Cir. 2019)

- Citizen Center v. Gessler, 770 F.3d 900, 907 (10th Cir. 2014)
- Kress v. CCA of Tennessee, LLC, 694 F.3d 890, 894 (7th Cir. 2012)
- Farmer v. Brennan, 511 U.S. 825, 846 (1994)
- Tucker v. Hughes, No. 18 CV 3154, 2024 WL 3495025, at *9 (N.D. Ill. July 22, 2024)
- Speech First, Inc. v. Killeen, 968 F.3d 628, 645-47 (7th Cir. 2020)
- Green v. Mansour, 474 U.S. 64, 73 (1985)
- Borzych v. Frank, 439 F.3d 388, 392 (7th Cir. 2006)
- International Society for Krishna Consciousness v. Rochford, 585 F.2d 263, 268 (7th Cir. 1978)
- Thornburgh v. Abbott, 490 U.S. 401, 405 n.5 (1989)
- Wells v. Caudill, 967 F.3d 598, 601 (7th Cir. 2020)
- Smith v. City of Chicago, 913 F.2d 469, 473 (7th Cir. 1990)
- Cotts v. Osafo, 692 F.3d 564, 569 (7th Cir. 2012)
- Hansen v. Bennett, 948 F.2d 397, 399 (7th Cir. 1991)
- Jones v. City of Chicago, 856 F.2d 985, 992 (7th Cir. 1988)