

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

Jaime Rios v. Reynaldo Guevara, Michael Mason, Joann Halvorsen
as Special Representative for Ernest Halvorsen, Deceased, City of
Chicago

Rios · No. 1:22-cv-03973 · Decided February 18, 2026

SUMMARY

This document is a plaintiff's memorandum supporting a motion for judgment as a matter of law under Federal Rule of Civil Procedure 50(a) in a civil rights action in the Northern District of Illinois. Jaime Rios argues that defendant Reynaldo Guevara suppressed evidence that he beat Cristino Garcia during an interrogation and that the evidence was favorable, unavailable through reasonable diligence, and material to Rios's underlying criminal conviction. The memorandum requests judgment on those issues or judgment on the relevant Brady claim, with a trial on damages only.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
JURISDICTION	United States District Court for the Northern District of Illinois
DECIDED	February 18, 2026
DOCKET	1:22-cv-03973
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed a memorandum in support of a motion for judgment as a matter of law under Federal Rule of Civil Procedure 50(a), seeking resolution of suppression, reasonable-diligence, and materiality issues concerning a claimed Brady violation and judgment on Count XII.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 50(a), judgment as a matter of law is proper when a party has been fully heard on an issue and a reasonable jury would lack a legally sufficient evidentiary basis to find for that party. The memorandum states that the Rule 50 inquiry mirrors the summary-judgment inquiry and asks whether reasonable jurors could find for the plaintiff by a preponderance of the evidence.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Jaime Rios v. Reynaldo Guevara, Michael Mason, Joann Halvorsen as Special Representative for Ernest Halvorsen, Deceased, City of Chicago

TOPICS

motion for directed verdict

civil procedure

section 1983

evidence

remedies

PRACTICE AREAS

civil rights

civil procedure

evidence

criminal procedure

QUESTIONS PRESENTED

1. Whether judgment as a matter of law should resolve in Rios's favor the issue of whether Guevara suppressed evidence that Garcia denied involvement in the murder.
2. Whether judgment as a matter of law should resolve in Rios's favor the issue of whether Guevara suppressed evidence that he beat Garcia in an effort to obtain a false implication of Rios.
3. Whether the alleged suppressed evidence could have been discovered through the exercise of reasonable diligence.
4. Whether the alleged suppressed evidence was material under Brady and its progeny.
5. Whether judgment as a matter of law should be entered on Count XII, with a trial limited to damages.

KEY QUOTATIONS

"A legally sufficient amount of evidence need not be overwhelming, but it must be more than a 'mere scintilla.'" (at 863)

"The reviewing standard "'mirrors'" that for summary judgment, such that "the inquiry under each is the same.'" (at 150)

"disclose evidence materially favorable to the accused" (at 87)

"Evidence qualifies as material when there is 'any reasonable likelihood' it could have 'affected the judgment of the jury.'" (at 1006)

"need not show that he 'more likely than not' would have been acquitted had the new evidence been admitted. He must show only that the new evidence is sufficient to 'undermine confidence' in the verdict." (at 1006)

FACTUAL BACKGROUND

The memorandum concerns Rios's civil-rights claim arising from his criminal prosecution for murder. Rios contends that Chicago detective Reynaldo Guevara beat alleged accomplice Cristino Garcia with a phonebook and billyclub or flashlight to obtain information implicating Rios, and concealed the beating and Garcia's denial of involvement from prosecutors. Trial evidence described Garcia's alleged beating, the absence of physical or forensic evidence linking Rios to the crime, conflicting or impeached testimony, and public-defender testimony

that the alleged beating would have warranted investigation but that interviewing Garcia presented practical obstacles.

PROCEDURAL HISTORY

Before trial, Rios moved for partial summary judgment on Counts XI and XII. The court denied partial summary judgment on Count XII because Aubrey O'Quinn had submitted a declaration stating that he never witnessed Guevara hitting a suspect. After trial evidence was presented, Rios filed this memorandum requesting judgment as a matter of law against Guevara and, alternatively, jury instructions resolving certain issues in Rios's favor and a trial limited to damages.

DISPOSITION

other

CASES CITED

- *Filipovich v. K & R Express Sys., Inc.*, 391 F.3d 859, 863 (7th Cir. 2004)
- *Massey v. Blue Cross-Blue Shield of Ill.*, 226 F.3d 922, 924 (7th Cir. 2000)
- *Reeves v. Sanderson Plumbing Prods., Inc.*, 530 U.S. 133, 150 (2000)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 250-51, 252 (1986)
- *Ruiz-Cortez v. City of Chicago*, 931 F.3d 592, 601 (7th Cir. 2019)
- *Brady v. Maryland*, 373 U.S. 83, 87 (1963)
- *Youngblood v. West Virginia*, 547 U.S. 867 (2006)
- *Giglio v. United States*, 405 U.S. 150, 154 (1972)
- *Kyles v. Whitley*, 514 U.S. 419, 434, 438 (1995)
- *Boss v. Pierce*, 263 F.3d 734, 740 (7th Cir. 2001)
- *United States v. Earnest*, 129 F.3d 906, 910 (7th Cir. 1997)
- *Wearry v. Cain*, 136 S. Ct. 1002, 1006 (2016)
- *Napue v. Illinois*, 360 U.S. 264, 271 (1959)
- *Smith v. Cain*, 132 S. Ct. 627, 629-31 (2012)
- *United States v. Agurs*, 427 U.S. 97, 113 (1976)

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