

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, PEORIA DIVISION

Phillip Anglin v. Lisa Draper et al.

Anglin · No. 1:24-cv-01424-JEH · Decided April 17, 2026

SUMMARY

The United States District Court for the Central District of Illinois granted Defendant Daniel J. Baker’s motion for summary judgment in Phillip Anglin’s Fourteenth Amendment excessive-force claim. The court concluded that the undisputed facts and video evidence showed no objectively unreasonable force and terminated Baker as a party, while reserving other dispositive motions for later consideration.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	April 17, 2026
DOCKET	1:24-cv-01424-JEH
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Daniel J. Baker moved for summary judgment on a pretrial detainee's Fourteenth Amendment excessive-force claim arising from the application of handcuffs and a waist chain. The court granted Baker's motion and terminated him as a party, while other dispositive motions remained pending.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that no genuine dispute as to any material fact exists and the movant is entitled to judgment as a matter of law. The evidence and reasonable inferences are construed in the light most favorable to the nonmoving party, but a nonmovant must identify specific evidence creating a genuine issue for trial. When a videotape plainly contradicts a party's version of events, the court views the facts in the light depicted by the video.

PRECEDENTIAL VALUE	unknown
PARTIES	Phillip Anglin v. Lisa Draper, Zia Samad, Daniel J. Baker

TOPICS

summary judgment fourteen amendment due process civil rights civil procedure

PRACTICE AREAS

civil rights constitutional law civil procedure

QUESTIONS PRESENTED

1. Whether Baker was entitled to summary judgment on Anglin's Fourteenth Amendment excessive-force claim.
2. Whether Anglin's failure to respond to Baker's statement of undisputed material facts required judgment for Baker.
3. Whether the video evidence so contradicted Anglin's account that the court was required to view the facts as depicted by the video.

HOLDINGS

1. Anglin's failure to respond to Baker's statement of undisputed material facts constituted an admission under the local rule, but did not automatically entitle Baker to judgment; Baker still had to demonstrate that he was entitled to judgment as a matter of law.
2. A pretrial detainee's excessive-force claim is analyzed under the Fourteenth Amendment's objective-unreasonableness standard, and Baker was entitled to summary judgment because the properly supported evidence, including video, showed no objectively unreasonable or violent use of force and Anglin failed to rebut that evidence with specific facts.

KEY QUOTATIONS

“Although Plaintiff’s failure to comply with the Court’s Local Rules is “deemed an admission of the fact” under Local Rule LR 7.1(D)(2)(b)(6), summary judgment in Defendants’ favor is not automatic.” (Section III.A)

“When a defendant’s “version of events is so utterly discredited” by a videotape that no reasonable jury could believe him, a court should view the facts “in the light depicted by the videotape.”” (Section III.C)

“Accordingly, because Defendant Baker has satisfied his burden of providing evidence to show the absence of a genuine issue of material fact that Plaintiff has failed to rebut with specific facts, his Motion for Summary Judgment (Doc. 70) is granted.” (Section III.C)

FACTUAL BACKGROUND

At approximately 12:50 a.m. on January 28, 2023, Baker escorted Anglin from his jail room to the booking area for transport to a hospital and applied a waist chain and handcuffs pursuant to jail policy. Anglin alleged that Baker applied the restraints violently and too tightly, causing pain and breathlessness, but testified that the handcuffs were loosened after he complained and that they were too tight for no more than about a minute. Video evidence showed Baker applying the restraints without apparent agitation or violence, and hospital records showed no wrist injury or treatment related to the incident.

PROCEDURAL HISTORY

Anglin filed an amended complaint alleging constitutional violations at the Livingston County Jail. After screening, the court identified a Fourteenth Amendment excessive-force claim against Baker and objectively unreasonable medical-care claims against Draper and Samad. Baker moved for summary judgment; Anglin filed a response and surreply but failed to respond properly to Baker's statement of undisputed material facts. The court nevertheless reviewed the record, including video evidence, granted Baker summary judgment, and directed the clerk to terminate Baker while retaining the remaining claims and dispositive motions for later consideration.

DISPOSITION

other

CASES CITED

- Zaya v. Sood, 836 F.3d 800, 804 (7th Cir. 2016)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 252 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986)
- Spierer v. Rossman, 798 F.3d 502, 507 (7th Cir. 2015)
- Melton v. Tippeconoe County, 838 F.3d 814, 818 (7th Cir. 2016)
- Ogden v. Atterholt, 606 F.3d 355, 358 (7th Cir. 2010)
- Raymond v. Ameritech Corp., 442 F.3d 600, 608 (7th Cir. 2006)
- Estate of Cole v. Fromm, 94 F.3d 254, 259 n.1 (7th Cir. 1996)
- Raddant v. Douglas Cnty., Wisconsin, 170 F.4th 583, 590 (7th Cir. 2026)
- Scott v. Harris, 550 U.S. 372, 380-81 (2007)
- Williams v. Brooks, 809 F.3d 936, 942 (7th Cir. 2016)

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