

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

Douglas Johnson v. Cook County Sheriff Thomas Dart, in his official
capacity, Antwaun Bacon, and Cook County

Johnson v. Dart · No. No. 22 C 3718 · Decided January 17, 2026

SUMMARY

The court denied summary judgment motions concerning claims arising from the allegedly excessively tight handcuffing of pretrial detainee Douglas Johnson during transport within the Cook County Department of Corrections. The court held that genuine disputes of material fact existed regarding excessive force, qualified immunity, and whether Johnson was denied the benefit of a family visit because of his disability. The court also denied Johnson’s motion to strike, granted his request to voluntarily dismiss the Monell claim against Sheriff Dart with prejudice, and set a telephonic hearing.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Robert W. Gettleman
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	January 17, 2026
DOCKET	No. 22 C 3718
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought claims under 42 U.S.C. § 1983, the Rehabilitation Act, the Americans with Disabilities Act, and Illinois indemnification law. Officer Bacon moved for summary judgment on the excessive-force claim; Cook County and Sheriff Dart moved for summary judgment on the Monell, Rehabilitation Act, and ADA claims; and plaintiff moved to strike arguments raised for the first time in defendants' reply.
STANDARD OF REVIEW	Summary judgment is proper when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court views facts and draws reasonable inferences in favor of the nonmovant. For the Fourteenth

Amendment excessive-force claim, the use of force is evaluated under an objective-reasonableness standard. Qualified immunity requires determining whether a reasonable factfinder could find a federal-rights violation and whether the unlawfulness was clearly established.

PRECEDENTIAL VALUE

unknown

TOPICS

summary judgment

civil rights

ada / disability

qualified immunity

municipal liability

PRACTICE AREAS

civil rights

disability discrimination

constitutional litigation

prisoner and detainee litigation

civil procedure

QUESTIONS PRESENTED

1. Whether genuine disputes of material fact precluded summary judgment on Johnson's Fourteenth Amendment excessive-force claim based on forcing him to walk a long distance while handcuffed and allegedly tightening the handcuffs excessively.
2. Whether Officer Bacon was entitled to qualified immunity on the excessive-force claim.
3. Whether genuine disputes of material fact precluded summary judgment on Johnson's Rehabilitation Act and ADA claims based on allegedly denying him the benefit of a family visit by requiring him to access it in severe pain.
4. Whether defendants' vicarious-liability argument was properly raised for the first time in a reply brief.
5. Whether Johnson's Monell claim should be voluntarily dismissed with prejudice.

HOLDINGS

1. Summary judgment was denied because disputed facts could allow a reasonable jury to find that Officer Bacon's use of handcuffs, particularly allegedly excessive tightening and refusal to loosen them after Johnson reported pain, was objectively unreasonable.
2. Officer Bacon was not entitled to qualified immunity at summary judgment.
3. Summary judgment was denied on Johnson's Rehabilitation Act and ADA claims because a reasonable jury could find that he was denied the benefit of a family visit by being required to access it while suffering severe pain.
4. Plaintiff's motion to strike was denied, although the court declined to give weight to defendants' vicarious-liability argument because it was raised for the first time in reply.
5. Johnson's Monell claim against Sheriff Dart was voluntarily dismissed with prejudice.

KEY QUOTATIONS

“The court finds that Officer Bacon has not carried his burden to show there is no genuine dispute as to the facts underlying whether his use of force on plaintiff was excessive.”

“The court also finds that the unlawfulness of the conduct at issue was clearly established at the time Officer Bacon acted.”

“The court agrees with plaintiff that a reasonable jury could find that plaintiff was denied the benefit of a family visit.”

“Consequently, the court finds that defendants have failed to carry their burden to show that there is no genuine dispute of material fact and that they are entitled to judgment as a matter of law.”

FACTUAL BACKGROUND

Douglas Johnson was a pretrial detainee at the Cook County Department of Corrections and had an inmate alert authorizing him to use a cane because of a hand and wrist condition. During a roughly five-city-block escort to a family visit, Officer Antwaun Bacon handcuffed Johnson despite his cane and allegedly refused repeated requests to loosen the cuffs. Johnson claimed that the cuffs caused severe pain, swelling, numbness, tingling, and continuing loss of wrist function; defendants disputed the tightness of the cuffs and asserted that Bacon applied them with room for Johnson's wrists. CCDOC policies allowed an exception to restraints when a physical disability could cause serious injury and required officers, when feasible, to check restraints to ensure they did not compromise circulation.

PROCEDURAL HISTORY

The case was pending in the Northern District of Illinois on cross-dispositive motions. The court denied both summary-judgment motions and denied plaintiff's motion to strike. The court construed plaintiff's response as a motion to voluntarily dismiss the Monell claim and dismissed that claim with prejudice.

DISPOSITION

other

CASES CITED

- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 586-87 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 257 (1986)
- Pittman v. Madison County, Illinois, 108 F.4th 561, 570 (7th Cir. 2024)
- Kingsley v. Hendrickson, 576 U.S. 389, 396-98 (2015)
- Mays v. Emanuele, 853 F. App'x 25, 27 (7th Cir. 2021)
- Stainback v. Dixon, 569 F.3d 767, 772-73 (7th Cir. 2009)
- Estate of Davis v. Ortiz, 987 F.3d 635, 638-39 (7th Cir. 2021)
- Muhammad v. Dart, No. 16 C 2280 (N.D. Ill. Mar. 8, 2019)
- Mickle v. Morin, 297 F.3d 114, 120 (2d Cir. 2002)
- Rooni v. Biser, 742 F.3d 737, 742-43 (7th Cir. 2014)

- Herzog v. Village of Winnetka, Illinois, 309 F.3d 1041, 1043 (7th Cir. 2002)
- Burton v. City of Zion, 901 F.3d 772, 777 (7th Cir. 2018)
- Tibbs v. City of Chicago, 469 F.3d 661, 666 (7th Cir. 2006)
- Sow v. Fortville Police Department, 636 F.3d 293, 304 (7th Cir. 2011)
- Lacy v. Dart, 2015 WL 5921810, at *2 (N.D. Ill. Oct. 8, 2015)
- Jaros v. Illinois Department of Corrections, 684 F.3d 667, 671-72 (7th Cir. 2012)
- Miller v. Wisconsin Department of Corrections, No. 08-CV-62-BBC, 2008 WL 2563154, at *5 (W.D. Wis. Apr. 22, 2008)
- United States v. Feinberg, 89 F.3d 333, 340-41 (7th Cir. 1996)
- Hardin v. American Electric Power, 188 F.R.D. 509, 511 (S.D. Ind. 1999)
- Ravenna v. Village of Skokie, 388 F. Supp. 3d 999, 1005 (N.D. Ill. 2019)

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