

SUPREME COURT OF ILLINOIS

People v. Marshall

Marshall, 2026 IL 132129 (Ill. 2026) · No. 132129 · Decided May 21, 2026

SUMMARY

The Illinois Supreme Court dismissed Jimmie Marshall’s appeal as moot after he pleaded guilty to aggravated battery, was sentenced to probation, and was released from custody. The court declined to apply the public interest exception to the mootness doctrine and vacated the appellate and circuit court judgments.

CASE DETAILS

COURT	Supreme Court of Illinois
JURISDICTION	Illinois Supreme Court
DECIDED	May 21, 2026
DOCKET	132129
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant appealed the denial of his motion for relief under Illinois Supreme Court Rule 604(h)(2) from an order granting the State's petition for pretrial detention. While the appeal was pending, defendant pleaded guilty, was sentenced to probation, and was released. The Illinois Supreme Court dismissed the appeal as moot and vacated the lower-court judgments.
PRECEDENTIAL VALUE	Published Illinois Supreme Court opinion; precedential.
PARTIES	Jimmie Marshall v. The People of the State of Illinois

TOPICS

- mootness
- appellate procedure
- appellate jurisdiction
- criminal procedure

PRACTICE AREAS

- criminal procedure
- appellate procedure

QUESTIONS PRESENTED

- Whether Marshall's appeal became moot after he pleaded guilty, was sentenced to probation, and was released from custody.

2. Whether the public-interest exception to the mootness doctrine permitted review of Marshall's arguments concerning the availability of plain-error and ineffective-assistance claims in a pretrial detention case.

HOLDINGS

1. The appeal was moot because, after Marshall pleaded guilty, was sentenced to probation, and was released from custody, it was no longer possible to grant him effectual relief.
2. The public-interest exception did not permit review because Marshall could not satisfy the requirement that an authoritative determination be desirable for future guidance of public officers; the law concerning plain-error and ineffective-assistance claims in pretrial detention cases was not in disarray.
3. The appeal was dismissed as moot, and the judgments of the appellate court and circuit court were vacated.

KEY QUOTATIONS

“An appeal is moot when events have occurred that render it impossible to grant the complaining party effectual relief.” (¶ 3)

“This “narrow” exception permits review of an otherwise moot question where the immediacy or magnitude of the interests involved warrant action by the court.” (¶ 4)

“We decline to render an advisory opinion.” (¶ 5)

FACTUAL BACKGROUND

Marshall was charged with aggravated battery after punching Livingston County Sheriff's Department sergeant Andy Rork in the face and breaking his nose. The circuit court granted the State's pretrial petition to detain him. During the appeal, Marshall pleaded guilty to aggravated battery, received probation, and was released from custody.

PROCEDURAL HISTORY

The Livingston County circuit court granted the State's pretrial petition to detain Marshall and denied his Rule 604(h)(2) motion for relief. The appellate court affirmed, concluding that Marshall had waived an argument that the State failed to establish a detainable offense. The Illinois Supreme Court granted review, but Marshall pleaded guilty and was sentenced to probation during the appeal, rendering the case moot.

DISPOSITION

dismissed

CASES CITED

- People v. Grayson, 2025 IL 131279, ¶¶ 3-4
- People v. Seymore, 2025 IL 131564, ¶¶ 33-34

- People v. Morgan, 2025 IL 130626, ¶ 16
- Commonwealth Edison Co. v. Illinois Commerce Commission, 2016 IL 118129, ¶ 16
- People v. Marshall, 2025 IL App (4th) 250426-U

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