

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, ROCK ISLAND DIVISION

Jeffrey Leonhardt v. Menard, Inc. d/b/a Menards Store No. 3285, a
Foreign Corporation

Leonhardt · No. 4:25-cv-04010-SLD-RLH · Decided April 24, 2026

SUMMARY

The United States District Court for the Central District of Illinois granted Menard, Inc.'s motion for summary judgment in Jeffrey Leonhardt's premises-liability action arising from a fall involving a loaded cart and an entrance threshold. The court held that Menards had no duty to protect Leonhardt from the open and obvious risk presented by the threshold and cart combination. The court rejected Menards's statute-of-repose argument and deemed Leonhardt's motion to strike moot because the challenged exhibit was not relied upon.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Rock Island Division
WRITING FOR THE COURT	Sara Darrow
JURISDICTION	United States District Court for the Central District of Illinois, Rock Island Division
DECIDED	April 24, 2026
DOCKET	4:25-cv-04010-SLD-RLH
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought an Illinois premises-liability and negligence action in state court after a slip-and-fall incident. Defendant removed the action based on diversity jurisdiction and moved for summary judgment; plaintiff moved to strike an exhibit to the summary-judgment motion.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that no genuine dispute of material fact exists and the movant is entitled to judgment as a matter of law. The record is construed and reasonable inferences are drawn in favor of the nonmoving party, but the nonmovant must identify specific evidence showing a genuine issue for trial.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Jeffrey Leonhardt v. Menard, Inc. d/b/a Menards Store No. 3285, a Foreign Corporation

TOPICS

premises liability duty of care summary judgment negligence statute of limitations

PRACTICE AREAS

premises liability negligence civil procedure construction law

QUESTIONS PRESENTED

1. Whether Leonhardt's premises-liability claim was barred by the Illinois construction statute of repose.
2. Whether Menards owed Leonhardt a duty to protect him from the risk created by pushing a heavily loaded cart over the entrance threshold.
3. Whether the allegedly dangerous condition was open and obvious and therefore negated the foreseeability and likelihood necessary to impose a duty.
4. Whether summary judgment was appropriate where the record lacked evidence that the threshold, cart, or combination of the two presented an unreasonable and foreseeable risk of harm.
5. Whether Leonhardt's motion to strike Exhibit 9 should be resolved when the court did not rely on that exhibit.

HOLDINGS

1. The Illinois construction statute of repose did not bar Leonhardt's claim because the claim concerned the operational use and maintenance of the store in light of the threshold's design, rather than negligent construction or design activity covered by the statute.
2. Menards did not owe Leonhardt a duty to protect him from the open and obvious risk that a heavily loaded cart could catch on the store's metal entrance threshold.
3. Summary judgment was proper because Leonhardt lacked evidence supporting a duty to protect against the alleged condition, and Menards was entitled to judgment as a matter of law.

KEY QUOTATIONS

"Because Menards did not have a duty to protect Leonhardt from the store condition at issue, Menards's motion for summary judgment is GRANTED." (at 2)

"On the whole, the Court holds that under the circumstances, Menards did not have a duty to guard against the particular injury suffered by Leonhardt." (at 18)

FACTUAL BACKGROUND

On September 15, 2021, Jeffrey Leonhardt attempted to push a heavily loaded blue cart carrying particleboard through the entrance of a Menards store in Moline, Illinois. The cart caught on a metal threshold beneath the sliding doors, tipped forward, and propelled backward, knocking Leonhardt to the ground. The threshold was part of the store design, but the record contained no evidence that it was damaged, unusual, defective, or involved in prior similar incidents. Menards employees indicated that other carts were more appropriate for moving particleboard, but Menards did not provide formal guidance about which carts customers should use.

PROCEDURAL HISTORY

Leonhardt filed suit in Illinois state court on December 9, 2024. Menards removed the case to the United States District Court for the Central District of Illinois on January 13, 2025. After discovery, Menards moved for summary judgment on the premises-liability elements and the Illinois construction statute of repose, and Leonhardt moved to strike Exhibit 9. The court rejected the statute-of-repose defense, granted summary judgment for Menards because Menards owed no duty regarding the open and obvious condition, found the motion to strike moot, directed entry of judgment, and ordered the case closed.

DISPOSITION

other

CASES CITED

- Payne v. Pauley, 337 F.3d 767, 770 (7th Cir. 2003)
- McCann v. Iroquois Mem'l Hosp., 622 F.3d 745, 752 (7th Cir. 2010)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 250, 255 (1986)
- Foley v. City of Lafayette, 359 F.3d 925, 928 (7th Cir. 2004)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 586 (1986)
- Pipitone v. United States, 180 F.3d 859, 861 (7th Cir. 1999)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986)
- Ryan v. Commonwealth Edison Co., 885 N.E.2d 544, 548, 550, 552 (Ill. App. Ct. 2008)
- Travelers Cas. & Sur. Co. v. Bowman, 893 N.E.2d 583, 589 (Ill. 2008)
- Stanley v. Ameren Ill. Co., 982 F. Supp. 2d 844, 861 (N.D. Ill. 2013)
- MBA Enters., Inc. v. N. Ill. Gas Co., 717 N.E.2d 849, 852 (Ill. App. Ct. 1999)
- Parker v. Four Seasons Hotels, Ltd., 845 F.3d 807, 811 (7th Cir. 2017)
- Jordan v. Nat'l Steel Corp., 701 N.E.2d 1092, 1094 (Ill. 1998)
- Mueller v. Phar-Mor, Inc., 784 N.E.2d 226, 231 (Ill. App. Ct. 2002)
- Reyes v. Menard, Inc., No. 21 CV 359, 2022 WL 2757666, at *2 (N.D. Ill. July 14, 2022)
- Genaust v. Ill. Power Co., 343 N.E.2d 465, 472 (Ill. 1976)
- Ward v. K Mart Corp., 554 N.E.2d 223, 226, 229, 232-33 (Ill. 1990)
- Deibert v. Bauer Bros. Constr. Co., 566 N.E.2d 239, 240-43 (Ill. 1990)
- Bruns v. City of Centralia, 21 N.E.3d 684, 687-95 (Ill. 2014)

- *Simpkins v. CSX Transp., Inc.*, 965 N.E.2d 1092, 1097 (Ill. 2012)
- *Forsyth v. Clark USA, Inc.*, 864 N.E.2d 227, 232 (Ill. 2007)
- *Rexroad v. City of Springfield*, 796 N.E.2d 1040, 1046 (Ill. 2003)
- *Van Gelderen v. Hokin*, 958 N.E.2d 1029, 1035-37 (Ill. App. Ct. 2011)
- *Rusch v. Leonard*, 927 N.E.2d 316, 321 (Ill. App. Ct. 2010)
- *Piotrowski v. Menard, Inc.*, 842 F.3d 1035 (7th Cir. 2016)
- *Grossman v. Menard, Inc.*, No. 17 C 2242, 2018 WL 4563071, at *2 (N.D. Ill. Sept. 24, 2018)
- *Horcher v. Guerin*, 236 N.E.2d 576, 579 (Ill. App. Ct. 1968)
- *Alcorn v. Stepzinski*, 540 N.E.2d 823, 826 (Ill. App. Ct. 1989)
- *Glass v. Morgan Guar. Tr. Co.*, 606 N.E.2d 384, 386-87 (Ill. App. Ct. 1992)
- *Trimble v. Olympic Tavern, Inc.*, 606 N.E.2d 1276, 1279 (Ill. App. Ct. 1993)
- *Sollami v. Eaton*, 772 N.E.2d 215, 225 (Ill. 2002)
- *Hillsamer v. Walmart, Inc.*, No. 20 C 6753, 2022 WL 4079451, at *4 (N.D. Ill. Sept. 6, 2022)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-central-district-of-ill/2026/jeffrey-leonhardt-v-menard-inc-d-b-a-menards-store-no-3285-jwt3yhco>