

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

**Bailey Conroy v. Board of Education for Cornell Community
Consolidated School District No. 426, et al.**

Conroy · No. 1:23-cv-01315 · Decided April 14, 2026

SUMMARY

The United States District Court for the Central District of Illinois denies defendants’ motion for summary judgment in Bailey Conroy’s employment-related action. The court finds genuine disputes of material fact concerning whether remote work was a reasonable accommodation under the ADA, whether the stated performance complaints were pretextual, and whether Conroy’s reports to law enforcement were motivating factors in her termination in violation of the First Amendment.

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 14, 2026
DOCKET	1:23-cv-01315
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for summary judgment on all four remaining claims. The court denied the motion and referred the matter for a settlement conference.
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 court must view the evidence and draw justifiable inferences in favor of the nonmovant, and a dispute precludes summary judgment only if it concerns a fact material under the governing law.
PRECEDENTIAL VALUE	Unknown; district court order with no published reporter citation or precedential designation in the supplied metadata.

TOPICS

summary judgment

reasonable accommodation

ada / disability

retaliation

section 1983

PRACTICE AREAS

civil procedure

employment law

civil rights

disability discrimination

constitutional law

QUESTIONS PRESENTED

1. Whether Defendants were entitled to summary judgment on Conroy's ADA disability-discrimination claim based on her status as a qualified individual and the reasonableness of her requested remote-work accommodation.
2. Whether Defendants were entitled to summary judgment on Conroy's ADA-retaliation claim because no reasonable jury could find a causal connection or pretext between her accommodation request and termination.
3. Whether Defendants were entitled to summary judgment on Conroy's First Amendment retaliation claim under 42 U.S.C. § 1983 because the evidence did not create a triable issue that her police reports were a motivating factor in her termination.
4. Whether Randall Vincent could be held personally liable under § 1983 based on his alleged participation in denying the accommodation, soliciting complaints, compiling them, and recommending termination.

HOLDINGS

1. Summary judgment was denied because Cornell's answer judicially admitted that Conroy was a qualified individual with a disability, and Conroy independently presented evidence creating a genuine factual dispute on that issue.
2. Summary judgment was denied because the evidence created a genuine dispute of material fact as to whether Conroy could temporarily work remotely while performing the essential functions of her position.
3. Summary judgment was denied because the close temporal proximity between Conroy's accommodation request and the solicitation of staff complaints, together with evidence that no prior complaints or performance issues had been documented, created a triable issue as to whether the stated complaints were pretextual.
4. Summary judgment was denied because the evidence created a genuine dispute as to whether Conroy's police reports were at least a motivating factor in the decision to terminate her.
5. Summary judgment was denied because the record and allegations created a triable issue concerning Vincent's personal participation in the alleged First Amendment retaliation.

KEY QUOTATIONS

“Summary judgment is appropriate “if 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 makes no finding that the Defendants terminated the Plaintiff because of her accommodation request. But only four days of separation between the request and the complaint forum, combined with the fact that no complaints against the Plaintiff had been recorded prior to her accommodation request, heavily intertwines the Plaintiff’s accommodation request with the Defendants’ proffered, non-discriminatory reason for termination.”

FACTUAL BACKGROUND

Bailey Conroy worked as an at-will bookkeeper and administrative assistant for Cornell beginning in July 2021. She reported suspected fraud by a former bookkeeper and later reported an allegedly aggressive parent who had breached school security. After receiving a doctor's note identifying depression, panic disorder, and ADHD, Conroy requested to work remotely until security problems were resolved; Vincent denied the request. Cornell subsequently solicited staff complaints, held a termination hearing, and terminated Conroy, leading to ADA and First Amendment claims.

PROCEDURAL HISTORY

Plaintiff Bailey Conroy filed suit after Cornell Community Consolidated School District No. 426 and Randall Vincent terminated her employment. The operative complaint contained claims for ADA disability discrimination, ADA retaliation, First Amendment retaliation and wrongful termination under 42 U.S.C. § 1983, and indemnification. After the parties completed briefing on Defendants' motion for summary judgment, the district court denied the motion because genuine disputes of material fact remained.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317 (1986)
- Gracia v. Volvo Europa Truck, N.V., 112 F.3d 291, 294 (7th Cir. 1997)
- Brazinski v. Amoco Petroleum Additives Co., 6 F.3d 1176, 1183 (7th Cir. 1993)
- Horton v. Pobjecky, 883 F.3d 941, 948 (7th Cir. 2018)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 250, 255 (1986)
- City of Chicago v. Equite LLC, 693 F. Supp. 3d 879, 889 (N.D. Ill. 2023)
- International Brotherhood of Electrical Workers, Local 176 v. Balmoral Racing Club, Inc., 293 F.3d 402, 404 (7th Cir. 2002)
- Peters v. City of Mauston, 311 F.3d 835, 842 (7th Cir. 2002)
- Kotwica v. Rose Packing Co., 637 F.3d 744, 748 (7th Cir. 2011)
- Keller v. United States, 58 F.3d 1194, 1198 n.8 (7th Cir. 1995)
- Williams v. Illinois Department of Corrections, No. 97 C 3475, 1999 WL 1068669, at *5-6 (N.D. Ill. Nov. 17, 1999)
- Equal Employment Opportunity Commission v. AutoZone, Inc., 630 F.3d 635, 643 (7th Cir. 2010)

- Coleman v. Keebler Co., 997 F. Supp. 1102, 1112 (N.D. Ind. 1998)
- Dunderdale v. United Airlines, Inc., 807 F.3d 849, 853-54 & n.1 (7th Cir. 2015)
- Brown v. Smith, 827 F.3d 609, 614 (7th Cir. 2016)
- Rowlands v. United Parcel Service—Fort Wayne, 901 F.3d 792, 801 (7th Cir. 2018)
- Hanners v. Trent, 674 F.3d 683, 691 (7th Cir. 2012)
- Davis v. Time Warner Cable of Southeastern Wisconsin, L.P., 651 F.3d 664, 672 (7th Cir. 2011)
- Anderson v. Donahoe, 699 F.3d 989, 996 (7th Cir. 2012)
- Scaife v. Cook County, 446 F.3d 735, 742 (7th Cir. 2006)
- Coleman v. Donahoe, 667 F.3d 835, 860, 862 (7th Cir. 2012)
- Hunt-Golliday v. Metropolitan Water Reclamation District, 104 F.3d 1004, 1014 (7th Cir. 1997)
- 145 Fisk, LLC v. Nicklas, 986 F.3d 759, 766 (7th Cir. 2021)
- Woodruff v. Mason, 542 F.3d 545, 551 (7th Cir. 2008)
- Milliman v. County of McHenry, 893 F.3d 422, 430 (7th Cir. 2018)
- Mahoney v. Beacon Health Ventures, 585 F. Supp. 3d 1161, 1174 (N.D. Ind. 2022)
- Spiegla v. Hull, 371 F.3d 928, 943 (7th Cir. 2004)
- Frakes v. Elba-Salem Fire Protection District, 200 F. Supp. 3d 736, 743 (C.D. Ill. 2016)
- Adedeji v. Cobble, No. 10 C 0892, 2013 WL 449592, at *5 (N.D. Ill. Feb. 5, 2013)
- T.E. v. Grindle, 599 F.3d 583, 588 (7th Cir. 2010)