

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

Juan Manzanares v. Michael Oslanzi and City of Spring Valley,
Illinois

Manzanares · No. 4:25-cv-04151-SLD-RLH · Decided April 24, 2026

SUMMARY

The court denied defendants’ motion to dismiss a complaint alleging Fourth Amendment excessive force under 42 U.S.C. § 1983, Illinois battery, and indemnification claims. The court held that video exhibits attached to the motion were not properly considered under the incorporation-by-reference doctrine because they were not referenced in the complaint, and it declined to convert the motion into one for summary judgment. The court also denied defendants’ motion for leave to file a reply and deemed their motion to file under seal moot.

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-04151-SLD-RLH
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the complaint, moved for leave to file a reply, and moved for leave to file certain video exhibits under seal. The district court denied the motion to dismiss and the motion for leave to file a reply, declined to consider the video exhibits or convert the motion into one for summary judgment, and deemed the sealing motion moot.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true, draws reasonable inferences in the plaintiff’s favor, and determines whether the allegations plausibly establish an entitlement to relief. Matters outside the pleadings generally may not be

considered unless an applicable exception applies or the court converts the motion to one for summary judgment under Rule 12(d).

PRECEDENTIAL VALUE

unknown

TOPICS

motions to dismiss

civil procedure

section 1983

police misconduct

qualified immunity

PRACTICE AREAS

civil procedure

civil rights

constitutional law

torts

QUESTIONS PRESENTED

1. Whether defendants' motion to dismiss could be resolved by considering video exhibits that were not attached to or referenced in the complaint.
2. Whether the court should convert the Rule 12(b)(6) motion into a motion for summary judgment under Rule 12(d).
3. Whether defendants' motion for leave to file a reply should be granted.
4. Whether the motion to dismiss should be granted on defendants' arguments concerning statutory immunity, legal justification, excessive force, and qualified immunity.

HOLDINGS

1. The court could not consider the videos under the incorporation-by-reference doctrine because the complaint did not reference them, and the plaintiff objected to their consideration.
2. The court declined to convert the motion to dismiss into a motion for summary judgment and excluded the video exhibits from consideration.
3. The motion to dismiss was denied because defendants' arguments for dismissal depended on video footage that the court declined to consider.
4. Leave to file a reply was denied because defendants' proposed arguments concerning the video exhibits and plaintiff's response did not involve new or unexpected issues.

FACTUAL BACKGROUND

On February 22, 2025, Spring Valley police arrested Juan Manzanares and transported him in a police vehicle driven by Michael Oslanzi. At a hospital, Oslanzi allegedly placed Manzanares in a headlock, pulled him from the vehicle by his handcuffs, and caused him to land on his shoulder. Manzanares alleged a torn rotator cuff and injuries to his hands and wrists requiring surgery and physical therapy, along with lost wages, medical expenses, and physical and emotional pain.

PROCEDURAL HISTORY

Manzanares filed a complaint alleging a Fourth Amendment excessive-force claim under 42 U.S.C. § 1983 against Michael Oslanzi, an Illinois battery claim against the City of Spring Valley, and an Illinois indemnification claim against the City. Defendants attached seven videos to their motion to dismiss and argued that the videos established statutory immunity, legal justification, objective reasonableness, and qualified immunity. The court concluded that the videos were outside the narrow incorporation-by-reference exception, declined to convert the motion to summary judgment because discovery could provide additional factual context, denied the motion to dismiss, and directed defendants to answer within fourteen days.

DISPOSITION

other

CASES CITED

- *Indep. Tr. Corp. v. Stewart Info. Servs. Corp.*, 665 F.3d 930, 934 (7th Cir. 2012)
- *Shefts v. Petrakis*, No. 10-cv-1104, 2011 WL 5930469, at *8 (C.D. Ill. Nov. 29, 2011)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 679 (2009)
- *Geinosky v. City of Chicago*, 675 F.3d 743, 745 n.1 (7th Cir. 2012)
- *Rosenblum v. Travelbyus.com Ltd.*, 299 F.3d 657, 661 (7th Cir. 2002)
- *Fin. Fiduciaries, LLC v. Gannett Co., Inc.*, 46 F.4th 654, 663 (7th Cir. 2022)
- *Levenstein v. Salafsky*, 164 F.3d 345, 347 (7th Cir. 1998)
- *Avitia v. City of Chicago*, No. 23 CV 15957, 2024 WL 2274101, at *4 (N.D. Ill. May 20, 2024)
- *Esco v. City of Chicago*, 107 F.4th 673, 678 (7th Cir. 2024)
- *Zahareas v. Raoul*, No. 23 C 3423 (N.D. Ill. Nov. 21, 2025)
- *Johnson v. City of Atlanta*, 107 F.4th 1292, 1300 (11th Cir. 2024)
- *Gen. Elec. Cap Corp. v. Lease Resol. Corp.*, 128 F.3d 1074, 1080–81 (7th Cir. 1997)
- *Nutrien Ag Sols., Inc. v. Consol. Grain & Barge Co.*, No. 4:21-cv-04091-SLD-JEH, 2022 WL 673700, at *3 (C.D. Ill. Mar. 7, 2022)