

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

ANDREW WHITE,)	
)	
Plaintiff,)	
)	
v.)	No. 3:19-cv-03181-SEM-TSH
)	
JOSEPH FELCHNER and ELLEN)	
SWEENEY)	
)	
Defendants.)	

DEFENDANT SWEENEY'S FOR SUMMARY JUDGMENT

Defendant, Ellen Sweeney, by and through her attorney, Kwame Raoul, Attorney General of the State of Illinois, and pursuant to Rule 56 of the Federal Rules of Civil Procedure, files this Motion for Summary Judgment, stating as follows:

1. Plaintiff Andrew White, *pro se*, filed suit against former Secretary of State Investigator Ellen Sweeney and police officer Joseph Felchner of the Rochester Police Department, taking issue with an arrest on August 10, 2018.
2. Defendant now moves for summary judgment because Defendant Sweeney had probable cause to initiate the arrest of Plaintiff.
3. Alternatively, qualified immunity bars Plaintiff's claims.
4. Attached hereto and incorporated by reference is a memorandum of law in support of this motion.

WHEREFORE, Defendant Ellen Sweeney respectfully request this Court grant her motion for summary judgment and enter judgment against the Plaintiff, dismissing this case entirely.

Respectfully submitted,

ELLEN SWEENEY,

Defendant,

KWAME RAOUL, Attorney General
of the State of Illinois,

Attorney for Defendant,

By: /s/ Shannon Fruth
Shannon Fruth, #6320635
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Springfield, Illinois 62701
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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2021, I caused a copy of the foregoing *Defendant Sweeney's Motion for Summary Judgment* to be electronically efiled with the Clerk of the Court, which will send electronic notice of same to the following:

Charles A. Pierce
Pierce Law Firm, P.C.
#3 Executive Woods Court, Suite 200
Belleville, IL 62226
cpierce@piercelawpc.com

and I certify that I mailed a copy of same by United States Postal Service, in an envelope properly addressed and fully prepaid, to the following:

Andrew White
1751 North Grand Avenue West, Lot #101
Springfield, IL 62702

Respectfully submitted,

By: /s/ Shannon Fruth #63202635
Shannon Fruth, #6320635
Assistant Attorney General
500 South Second Street
Springfield, Illinois 62701
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