

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RICHARD L. ROBARTS,)	
)	Case No.: <u>3:16-cv-50228</u>
Plaintiff,)	
v.)	
)	Hon. Judge: Frederick J. Kapala
)	
ILLINOIS DEPARTMENT OF)	
HUMAN SERVICES,)	Magistrate Judge: Iain D. Johnston
)	
Defendant.)	
)	

DEFENDANT’S MOTION FOR JUDGMENT ON THE PLEADINGS

NOW COMES Defendant, Illinois Department of Human Services (“DHS”), by and through its attorney, Lisa Madigan, Attorney General of the State of Illinois, and respectfully moves this Court to dismiss Plaintiff’s Complaint pursuant to Federal Rule of Civil Procedure 12(c). In support of its motion, Defendant states the following:

1. Richard Robarts (“Plaintiff”) is employed by the DHS as a Senior Rehabilitation Counselor. (Dkt. 1, ¶ 16). Plaintiff is deaf and uses a sign language interpreter to communicate. (Dkt. 1, ¶ 2).
2. Judgment on the pleadings is proper as to Plaintiff’s claims under the Illinois Human Rights Act (IHRA) because these claims are barred by sovereign immunity.
3. The particular grounds for this motion are set forth in the accompanying memorandum of law.

WHEREFORE, for the reasons articulated in Defendant’s Memorandum of Law, Defendant ILLINOIS DEPARTMENT OF HUMAN SERVICES, respectfully requests this

Honorable court grant Defendant's Motion for Judgment on the Pleadings and any other relief the Court deems appropriate.

LISA MADIGAN
Attorney General of Illinois

Respectfully submitted,

By: s/Emma Steimel
EMMA STEIMEL
Assistant Attorney General
General Law Bureau
100 W. Randolph Street, 13th Floor
Chicago, Illinois 60601
(312) 814-2035
Esteimel@atg.state.il.us