

IN THE SUPREME COURT OF THE UNITED STATES

Savian J. Bridges,

Petitioner,

v.

Wal-Mart Associates, Inc.,

Respondent.

Case No.

**AFFIDAVIT OR DECLARATION IN SUPPORT OF MOTION FOR LEAVE TO
PROCEED IN FORMA PAUPERIS**

I, **Savian J. Bridges**, declare that I am the petitioner in the above-entitled proceeding; that in support of my motion to proceed in forma pauperis, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

I further state the following facts:

1. Personal Information

- **Full Name:** Savian J. Bridges
 - **Address:** 1040 West 88th Street, Chicago, IL 60620
 - **Phone:** (312) 508-1837
 - **Email:** savianjbridges@outlook.com
-

2. Income

- I am **not employed** and do not have any income from work.
 - I receive **\$292.00 per month in SNAP benefits (Illinois Supplemental Nutrition Assistance Program)**.
 - I receive **no other financial support or assistance**.
-

3. Assets

- I do not own any real estate, vehicles, bank accounts, stocks, bonds, or other assets of significant value.
 - I do not own any property of value exceeding \$500.
-

4. Expenses

- I use my SNAP benefits exclusively for food.
 - I rely on assistance from friends or community resources to meet basic needs such as shelter and transportation.
-

5. Dependents

- I have **no dependents** for whom I provide financial support.
-

6. Court IFP History

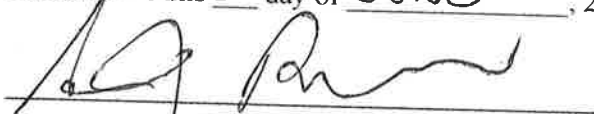
- I was granted leave to proceed **in forma pauperis** in:

- The **Circuit Court of Cook County**
- The **Appellate Court of Illinois, First Judicial District**
- The **Supreme Court of Illinois**

7. Declaration

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 2nd day of JUNE, 2025.



/s/ Savian J. Bridges

Savian J. Bridges

Pro Se Petitioner



**AFFIDAVIT OR DECLARATION
IN SUPPORT OF MOTION FOR LEAVE TO PROCEED *IN FORMA PAUPERIS***

I, Savina J. Bridges, am the petitioner in the above-entitled case. In support of my motion to proceed *in forma pauperis*, I state that because of my poverty I am unable to pay the costs of this case or to give security therefor; and I believe I am entitled to redress.

1. For both you and your spouse estimate the average amount of money received from each of the following sources during the past 12 months. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate. Use gross amounts, that is, amounts before any deductions for taxes or otherwise.

Income source	Average monthly amount during the past 12 months		Amount expected next month	
	You	Spouse	You	Spouse
Employment	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Self-employment	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>	\$ <u>Ø</u>
Income from real property (such as rental income)	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Interest and dividends	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Gifts	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Alimony	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Child Support	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Retirement (such as social security, pensions, annuities, insurance)	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Disability (such as social security, insurance payments)	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Unemployment payments	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Public-assistance (such as welfare)	\$ <u>Ø</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Other (specify): <u>SNAP</u>	\$ <u>292.00</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>
Total monthly income:	\$ <u>292.00</u>	\$ <u>N/A</u>	\$ <u>Ø</u>	\$ <u>N/A</u>

2. List your employment history for the past two years, most recent first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
Sam's Club	9400 Western	05/2018 12/2019	\$ 800.00
			\$
			\$

3. List your spouse's employment history for the past two years, most recent employer first. (Gross monthly pay is before taxes or other deductions.)

Employer	Address	Dates of Employment	Gross monthly pay
N/A			\$
			\$
			\$

4. How much cash do you and your spouse have? \$ Ø
Below, state any money you or your spouse have in bank accounts or in any other financial institution.

Type of account (e.g., checking or savings)	Amount you have	Amount your spouse has
	\$	\$
	\$	\$
	\$	\$

5. List the assets, and their values, which you own or your spouse owns. Do not list clothing and ordinary household furnishings.

☐ Home
Value N/A

☐ Other real estate
Value N/A

☐ Motor Vehicle #1
Year, make & model N/A
Value _____

☐ Motor Vehicle #2
Year, make & model N/A
Value _____

☐ Other assets
Description N/A
Value _____

6. State every person, business, or organization owing you or your spouse money, and the amount owed.

Person owing you or your spouse money	Amount owed to you	Amount owed to your spouse
N/A	\$ _____	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

7. State the persons who rely on you or your spouse for support. For minor children, list initials instead of names (e.g. "J.S." instead of "John Smith").

Name	Relationship	Age
N/A	_____	_____
_____	_____	_____
_____	_____	_____

8. Estimate the average monthly expenses of you and your family. Show separately the amounts paid by your spouse. Adjust any payments that are made weekly, biweekly, quarterly, or annually to show the monthly rate.

	You	Your spouse
Rent or home-mortgage payment (include lot rented for mobile home)	\$ Ø	\$ N/A
Are real estate taxes included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is property insurance included? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Utilities (electricity, heating fuel, water, sewer, and telephone)	\$ Ø	\$ N/A
Home maintenance (repairs and upkeep)	\$ Ø	\$ N/A
Food	\$ 292.00	\$ N/A
Clothing	\$ Ø	\$ N/A
Laundry and dry-cleaning	\$ Ø	\$ N/A
Medical and dental expenses	\$ Ø	\$ N/A

	You	Your spouse
Transportation (not including motor vehicle payments)	\$ 10.00	\$ N/A
Recreation, entertainment, newspapers, magazines, etc.	\$ Ø	\$ N/A
Insurance (not deducted from wages or included in mortgage payments)		
Homeowner's or renter's	\$ Ø	\$ N/A
Life	\$ Ø	\$ N/A
Health	\$ Ø	\$ N/A
Motor Vehicle	\$ Ø	\$ N/A
Other: _____	\$ Ø	\$ N/A
Taxes (not deducted from wages or included in mortgage payments)		
(specify): _____	\$ Ø	\$ N/A
Installment payments		
Motor Vehicle	\$ Ø	\$ N/A
Credit card(s)	\$ Ø	\$ N/A
Department store(s)	\$ Ø	\$ N/A
Other: _____	\$ Ø	\$ N/A
Alimony, maintenance, and support paid to others	\$ Ø	\$ N/A
Regular expenses for operation of business, profession, or farm (attach detailed statement)	\$ Ø	\$ N/A
Other (specify): _____	\$ Ø	\$ N/A
Total monthly expenses:	\$ 362.00	\$ N/A

9. Do you expect any major changes to your monthly income or expenses or in your assets or liabilities during the next 12 months?

☐ Yes

☒ No

If yes, describe on an attached sheet.

10. Have you paid – or will you be paying – an attorney any money for services in connection with this case, including the completion of this form? ☐ Yes ☒ No

If yes, how much? _____

If yes, state the attorney's name, address, and telephone number:

11. Have you paid—or will you be paying—anyone other than an attorney (such as a paralegal or a typist) any money for services in connection with this case, including the completion of this form?

☐ Yes

☒ No

If yes, how much? _____

If yes, state the person's name, address, and telephone number:

12. Provide any other information that will help explain why you cannot pay the costs of this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: JUNE 25, 2025

(Signature)

MARLEY RAE FINLEY
OFFICIAL SEAL
Notary Public - State of Illinois
My Commission Expires
June 07, 2027

IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Savian J. Bridges,

Petitioner.

v.

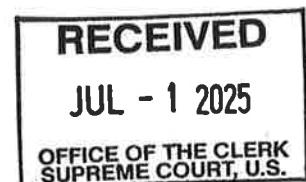
Wal-Mart Associates, Inc., a/k/a and d/b/a Sam's Club, Inc.,

Respondent.

**On Petition for Writ of Certiorari to the Supreme Court of Illinois and the Appellate Court
of Illinois, First District**

PETITION FOR WRIT OF CERTIORARI

1. **Savian J. Bridges**, Petitioner and Pro Se litigant, respectfully petitions this Honorable Court for a writ of certiorari to review the judgment and orders entered by the Supreme Court of Illinois and the Appellate Court of Illinois, First District, in Case No. 1-24-0557 (originating from Trial Court No. 2021L010951).



QUESTIONS PRESENTED

1. Whether a state appellate court violates the Due Process Clause of the Fourteenth Amendment when it dismisses a timely-filed civil appeal for lack of jurisdiction, despite a Pro Se litigant's compliance with state filing procedures.
2. Whether denial of access to appellate review through failure to properly serve the appellate mandate—especially when the litigant is Pro Se and has no means of legal representation—constitutes a violation of procedural due process under the United States Constitution.
3. Whether conflicting and potentially irregular mandate notices, including one that was never received and another that contains materially inconsistent formatting and content, raise a substantial federal question regarding fairness, integrity, and transparency of state judicial processes.

PARTIES TO THE PROCEEDING

- **Petitioner:** Savian J. Bridges
- **Respondent:** Wal-Mart Associates, Inc., a/k/a and d/b/a Sam's Club, Inc.

TABLE OF CONTENTS

Section	Page
Opinions Below	1
Jurisdiction	2
Constitutional and Statutory Provisions Involved	3
Statement of the Case	4
Reasons for Granting the Writ	5
Conclusion	6
Index to Appendices	7-8

Table of Authorities

Authorities	Page
<i>Mullane v. Central Hanover Bank & Trust Co.</i> , 339 U.S. 306 (1950)	5
U.S. Const. amend. XIV	3
U.S. Const. amend. I	3
28 U.S.C. § 1257(a)	3

OPINIONS BELOW

- The Illinois Supreme Court **denied** Petitioner's Petition for Leave to Appeal on **January 29, 2025**, and denied Petitioner's Motion for Reconsideration on **April 8, 2025**.
 - The Appellate Court of Illinois, First District, **issued a Mandate** on **March 5, 2025**, with a subsequent notification of mandate "forthwith" on **April 8, 2025**, after denying reconsideration.
 - A version of this mandate appears to be inconsistent with prior notice. Petitioner avers that **he did not receive the March 5, 2025 mandate**, which prejudiced his ability to seek review or intervention.
-

JURISDICTION

This Court has jurisdiction pursuant to **28 U.S.C. § 1257(a)**. The Illinois Supreme Court entered final judgment on **April 8, 2025**, and this petition was filed within the 90-day time limit.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- **U.S. Const. amend. XIV, § 1** – Due Process Clause
 - **U.S. Const. amend. I** – Right to Petition for Redress
 - **28 U.S.C. § 1257(a)** – Final judgments from highest state courts
-

STATEMENT OF THE CASE

Petitioner, a Pro Se litigant, brought a civil action against Wal-Mart Associates, Inc. for employment-related claims in the Circuit Court of Cook County, Illinois. After unfavorable rulings, Petitioner filed a timely Notice of Appeal to the Appellate Court, First District.

Despite timely and complete filings, the appeal was dismissed for lack of appellate jurisdiction. Petitioner then filed a Petition for Leave to Appeal (PLA) to the Illinois Supreme Court, which was **denied on January 29, 2025**, and followed by a **denial of a Motion for Reconsideration on April 8, 2025**.

On April 9, 2025, a **Mandate Letter** was purportedly issued to finalize the denial. However, Petitioner asserts under penalty of perjury that **he never received the March 05, 2025 mandate notice**.

Additionally, the record contains a **conflicting document titled "Mandate Letter"**, which carries the Supreme Court seal but includes irregularities suggesting a miscommunication or clerical error. The inconsistencies in date, format, and delivery raise concerns of **administrative confusion and denial of due process**.

REASONS FOR GRANTING THE WRIT

1. Denial of Appellate Rights Due to Improper Notice and Service

Petitioner was deprived of notice concerning the final mandate, which is a necessary procedural trigger for any subsequent appellate relief. This denial contravenes **Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306 (1950)**, which requires proper and timely notice in legal proceedings.

2. Conflicting and Potentially Invalid Mandate Documentation

Petitioner includes in this filing a “**Mandate Letter**” that misrepresents the official mandate procedure. This conflicting record demonstrates a breakdown in procedural fairness and integrity, calling for federal intervention.

3. Systemic Failure to Accommodate a Pro Se Litigant

Petitioner, as a Pro Se filer, received no assistance or consideration in understanding, accessing, or responding to critical procedural rulings. This systemic disregard violates equal protection and fair access under the law.

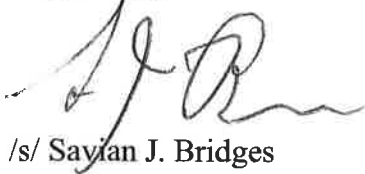
4. Exceptional Importance and National Precedent

This case presents a compelling opportunity for the Court to affirm that **access to justice cannot be denied based on clerical error or procedural mismanagement**, particularly for Pro Se litigants whose rights deserve equal protection.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Supreme Court of the United States grant this **Petition for a Writ of Certiorari**.

Respectfully submitted,



/s/ Savian J. Bridges

Savian J. Bridges

Pro Se Petitioner

1040 West 88th Street

Chicago, IL 60620

(312) 508-1837

savianjbridges@outlook.com

Date: 06/02/2025

INDEX TO APPENDIX

Appendix	Document Title
A	Request for Intervention (Filed February 3, 2025) – Letter to Illinois Supreme Court requesting oversight of procedural irregularities.
B	File-stamped Complaint (Filed February 7, 2024) – Underlying complaint in Circuit Court of Cook County.
C	Affidavit of Non-Receipt of Mandate – Sworn statement affirming that no mandate or notice was received.
D	PLA Denial Order (Dated January 29, 2025) – Illinois Supreme Court's order denying leave to appeal.
E	Order Denying Motion for Reconsideration (Entered April 8, 2025) – Docket notation of denial with no formal written order.
F	Motion for Reconsideration (Filed January 30, 2025) – Motion filed in Illinois Supreme Court seeking reconsideration of PLA denial.
G	Petition for Leave to Appeal (PLA) (Filed October 25, 2024) – Petitioner's full appellate argument before the Illinois Supreme Court.
H	Mandate Letter – Informal, undated correspondence purporting to be mandate; no court signature or order attached.

I **Mandate Letter** – Document lacking certification or procedural authority.

J **Official Notice of Order** – Clerk’s correspondence regarding entry of PLA
denial

Savian J. Bridges

1040 West 88th Street
Chicago, IL 60620
(312) 508-1837
savianjbridges@outlook.com
February 3, 2025

TO:

Hon. Mary Jane Theis

Chief Justice
Illinois Supreme Court
200 East Capitol Avenue
Springfield, IL 62701

SUBJECT: Request for Intervention Regarding Clerical Misconduct and Judicial Due Process Violations

Dear Chief Justice Theis,

I am writing to formally request your **intervention** in my case, **Savian J. Bridges v. Wal-Mart Associates, Inc. (Case No. 2021L010951)**, due to **severe procedural irregularities, clerical misconduct, and judicial bias** that have deprived me of my constitutional right to a fair and impartial legal process.

Despite multiple attempts to seek justice through the **Circuit Court of Cook County, the Illinois Appellate Court (First District), and the Illinois Supreme Court**, my filings have been improperly handled, resulting in procedural barriers and delays that have significantly prejudiced my ability to proceed with my case.

I. SUMMARY OF CLERICAL AND JUDICIAL FAILURES

1. Circuit Court Clerk's Office Misconduct

- My filings were **rejected, lost, or misprocessed**, causing procedural delays.
- I have received **inconsistent or no responses** when inquiring about the status of my case documents.

2. Appellate Court Clerk's Office Misconduct

- My appeal documents were **not timely docketed** and were subjected to **arbitrary rejections**.
 - I was not properly notified of important case updates, depriving me of the ability to respond effectively.
 - 3. **Supreme Court Clerk's Office Misconduct**
 - My **Petition for Leave to Appeal (PLA)** was not processed correctly, leading to a **delayed and procedurally unfair ruling**.
 - I was not notified of critical decisions impacting my appeal.
 - 4. **Judicial Bias and Due Process Violations**
 - **Hon. Mary Colleen Roberts (Trial Court Judge)** issued **unwarranted dismissals** of my case without proper legal basis.
 - **Hon. Bertina Lampkin, Jesse G. Reyes, and Leroy K. Martin Jr. (Appellate Court Justices)** wrongfully dismissed my appeal based on a **misinterpretation of jurisdictional requirements**.
 - **The Illinois Supreme Court denied my PLA without opinion**, effectively foreclosing my right to appellate review, despite the presence of **substantial legal and constitutional issues**.
-

II. REQUEST FOR IMMEDIATE INTERVENTION

Given the **systemic procedural failures** and **judicial misconduct** that have obstructed my right to due process, I respectfully request the following:

1. **An official review of the actions of the Clerk's Offices at the Circuit Court, Appellate Court, and Supreme Court** to address systemic clerical failures.
2. **An investigation into the handling of my case filings and judicial rulings** to ensure compliance with Illinois Supreme Court Rules and constitutional due process requirements.
3. **Restoration of my right to appellate review** by reconsidering my **Petition for Leave to Appeal (PLA)** in the interest of justice.

I urge the Illinois Supreme Court to ensure that my **right to a fair and impartial legal process is upheld** and that necessary corrective actions are taken to prevent further injustices.

I respectfully request a **written response within 10 business days** outlining any steps taken to address these concerns. Should this matter remain unresolved, I will be compelled to escalate my complaint to federal oversight authorities, including the **U.S. Supreme Court and the U.S. Department of Justice, Civil Rights Division**.

Thank you for your prompt attention to this serious matter. I look forward to your response.

Sincerely,

/ s / Savian J. Bridges
Savian J. Bridges
Pro Se Litigant
1040 West 88th Street
Chicago, IL 60620
(312) 508-1837
savianjbridges@outlook.com

Date: **February 3, 2025**

Appellant's Brief
IN THE APPELLATE COURT OF ILLINOIS
FIRST DISTRICT

SAVIAN J. BRIDGES,)	
Plaintiff,)	
)	
v.)	General No. 1-24-0557
)	Trial Court No. 21L10951
WAL-MART ASSOCIATES, INC.,)	
a/k/a and d/b/a)	
SAM'S CLUB, INC.,)	
Defendant.)	

BRIEF

July 27, 2024

TABLE OF CONTENTS

I. Jurisdictional Statement	4
II. Statement of Issues	4
III. Statement of the Case	4
IV. Statement of Facts	5
V. Summary of the Argument	6
VI. Argument	7
A. Standard of Review	7
B. Legal Arguments	7
1. Wrongful Termination	7
2. Motions to Vacate Judgments	8
3. Fair Opportunity to Present Case	9
VII. Conclusion	9
VIII. Certificate of Compliance	10
IX. Certificate of Service	11
TABLE OF AUTHORITIES	3

TABLE OF AUTHORITIES

Cases

- Haines v. Kerner, 404 U.S. 519 (1972) 8
- Erickson v. Pardus, 551 U.S. 89 (2007) 8
- Board of Regents of State Colleges v. Roth, 408 U.S. 564 (1972) 8
- Mathews v. Eldridge, 424 U.S. 319 (1976) 8
- Goldberg v. Kelly, 397 U.S. 254 (1970) 9

Statutes

- Illinois Human Rights Act, 775 ILCS 5/1-101 et seq. 7
- Illinois Whistleblower Act, 740 ILCS 174/1 et seq. 7
- Illinois Supreme Court Rule 137 7
- Civil Rights Act of 1964, Title VII, 42 U.S.C. § 2000e et seq. 7

I. Jurisdictional Statement

The jurisdiction of this Court is invoked under Illinois Supreme Court Rule 301, which grants this Court jurisdiction to review final judgments of the Circuit Court of Cook County. The judgment appealed from was entered on January 19, 2024, and the notice of appeal was timely filed on February 7, 2024.

II. Statement of Issues

1. Whether the lower court erred in dismissing the Pro Se filer's wrongful termination claim as presented in the Second Amended Complaint.
2. Whether the lower court abused its discretion in denying the motions to vacate judgments.
3. Whether the Pro Se filer was provided with a fair opportunity to present his case.

III. Statement of the Case

This case arises from the wrongful termination of the Pro Se filer, Savian J. Bridges, by Wal-Mart Associates, Inc. The initial complaint was filed on November 9, 2021 (Document 1). The First Amended Complaint was filed on March 14, 2022 (Document 2), and the Second Amended Complaint, which is the focus of this appeal, was filed on July 18, 2023 (Document 3). Several motions to vacate judgments were filed and denied by the lower court, leading to this appeal. The February 7, 2024 Complaint (Document 4), the February 20, 2024 Order (Document 5), the March 5, 2024 Order (Document 6), the March 12, 2024 Order (Document 7), the Notice of Motion (Document 8), and the supporting Exhibits (Document 9) are included in this submission.

IV. Statement of Facts

Savian J. Bridges, the Pro Se filer, was employed by Wal-Mart Associates, Inc. from 2018 until his termination on December 21, 2019. Mr. Bridges filed an initial complaint on November 9, 2021, alleging wrongful termination under Illinois law.

The Second Amended Complaint, filed on July 18, 2023, provides a detailed account of the alleged wrongful termination, including claims of racial, age, and gender discrimination, and retaliation for exercising protected rights under the Illinois Human Rights Act and the Illinois Whistleblower Act.

The facts as alleged in the complaints and motions include:

1. ****Employment and Performance****: Mr. Bridges was employed by Wal-Mart Associates, Inc. from 2018 to December 21, 2019. He received satisfactory performance reviews and no disciplinary actions prior to the incidents leading to his termination.
2. ****Incidents Leading to Termination****: In 2019, Mr. Bridges reported several safety violations and discriminatory practices to his supervisors and human resources. These reports included complaints about unsafe working conditions and discriminatory remarks made by a supervisor.
3. ****Retaliation and Discrimination****: Following these reports, Mr. Bridges experienced increased scrutiny, unwarranted disciplinary actions, and a hostile work environment. He alleges that his termination was a direct result of his complaints and was discriminatory based on his race, age, and gender.

4. ****Termination****: Mr. Bridges was terminated on December 21, 2019, without prior notice or a clear explanation. He was informed that his position was being eliminated, but he later discovered that his role was filled by a younger, less experienced individual.
5. ****Legal Actions****: After his termination, Mr. Bridges filed complaints with the Equal Employment Opportunity Commission (EEOC) and the Illinois Department of Human Rights (IDHR). Both agencies issued right-to-sue letters, prompting Mr. Bridges to file his initial complaint and subsequent amended complaints.
6. ****Motions to Vacate Judgments****: Mr. Bridges filed several motions to vacate judgments, arguing that new evidence had come to light and that he had not been given a fair opportunity to present his case. These motions were denied by the lower court.

The February 7, 2024 Complaint outlines additional claims and facts presented by Mr. Bridges. The subsequent court orders on February 20, 2024, March 5, 2024, and March 12, 2024, all denied his motions to vacate judgments.

V. Summary of the Argument

The lower court's dismissal of the wrongful termination claim was in error and an abuse of discretion. The Pro Se filer was not given a fair opportunity to present his case, and the denial of the motions to vacate judgments further compounded this error. The case should be reinstated to allow for a fair hearing.

VI. Argument

A. Standard of Review

The standard of review for the lower court's dismissal and denial of motions to vacate is de novo for dismissal and abuse of discretion for the denial of motions to vacate.

B. Legal Arguments

1. Wrongful Termination

The wrongful termination claim filed by the Pro Se filer in the Second Amended Complaint met the legal standards for such claims under Illinois law. The lower court's dismissal failed to consider the evidence and arguments presented. The complaints provide a detailed account of the alleged wrongful termination, including claims of racial, age, and gender discrimination, and retaliation for exercising protected rights under the Illinois Human Rights Act (775 ILCS 5/1-101 et seq.) and the Illinois Whistleblower Act (740 ILCS 174/1 et seq.).

The Illinois Human Rights Act prohibits employment discrimination on the basis of race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, physical or mental disability, military status, sexual orientation, and pregnancy. The Illinois Whistleblower Act protects employees from retaliation for disclosing information about illegal activities in the workplace.

Illinois Supreme Court Rule 137 ensures that litigants, including Pro Se filers, are protected against frivolous lawsuits and ensures they are given fair consideration. Furthermore, Title VII of

the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.) prohibits employment discrimination based on race, color, religion, sex, and national origin, reinforcing the protections against wrongful termination and retaliation.

In *Haines v. Kerner*, 404 U.S. 519 (1972), the Supreme Court held that Pro Se pleadings are to be held to less stringent standards than formal pleadings drafted by lawyers. Similarly, in *Erickson v. Pardus*, 551 U.S. 89 (2007), the Supreme Court reiterated that a Pro Se complaint, however inartfully pleaded, must be held to less stringent standards.

In *Board of Regents of State Colleges v. Roth*, 408 U.S. 564 (1972), the Supreme Court held that procedural due process requires notice and an opportunity to be heard before a person can be deprived of life, liberty, or property. In this case, Mr. Bridges was not given a fair opportunity to present his case before his termination.

2. Motions to Vacate Judgments

The lower court's denial of the motions to vacate judgments was an abuse of discretion. The motions were supported by substantial evidence and legal arguments that warranted reconsideration of the judgments. The court orders show that the court did not adequately consider the merits of the Pro Se filer's claims.

In *Mathews v. Eldridge*, 424 U.S. 319 (1976), the Supreme Court established a three-part test to determine whether due process has been afforded: (1) the private interest that will be affected by the official action, (2) the risk of an erroneous deprivation of such interest through the

procedures used, and the probable value of additional or substitute procedural safeguards, and (3) the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail. Applying this test, the lower court failed to provide adequate procedural safeguards to Mr. Bridges, leading to an erroneous deprivation of his rights.

3. Fair Opportunity to Present Case

The Pro Se filer, acting without legal representation, was not afforded a fair opportunity to present his case. The procedural barriers and the court's actions deprived him of a fair hearing. The detailed accounts in the complaints, the motions to vacate judgments, and the Notice of Motion highlight the challenges faced by the Pro Se filer in presenting his case effectively.

In *Goldberg v. Kelly*, 397 U.S. 254 (1970), the Supreme Court emphasized the importance of providing a fair hearing to individuals whose benefits are being terminated. Although this case involves termination of employment rather than benefits, the principle remains the same: individuals must be given a fair opportunity to present their case before an impartial tribunal.

VII. Conclusion

For the reasons stated above, the Plaintiff respectfully requests that this Court reverse the lower court's dismissal of the wrongful termination claim, grant the motions to vacate judgments, and remand the case for further proceedings consistent with this Court's opinion.

VIII. Certificate of Compliance

The undersigned certifies that the foregoing brief complies with the formatting and length requirements of Rule 341, 342, and 343 of the Illinois Supreme Court Rules.

Savian J. Bridges

IX. Certificate of Service

The undersigned certifies that a copy of the foregoing brief and Appendix was served upon the Defendant's counsel by electronic Filing on July 27,2024.

Savian J. Bridges

APPENDIX A

No. 1-24-0557

IN THE
APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT

SAVIAN J. BRIDGES,

Plaintiff-Appellant,

vs.

WAL-MART ASSOCIATES, INC., a/k/a
and d/b/a SAM'S CLUB, INC.,

Defendant-Appellee,

Appeal from Cook County

Circuit No. 2021L010951

Trial Judge: Honorable Mary Colleen
Roberts

Date of Notice of Appeal: March 14, 2024

ORDER

This cause coming to be heard on *Defendant - Appellee's Motion to Dismiss Appeal Based on Lack of Appellate Jurisdiction*, it is hereby ordered as follows; a Response having been filed;

1. Defendant/Appellee's motion is **GRANTED**.
2. This appeal is dismissed with prejudice based on lack of appellate jurisdiction.

Bertina Lampkin
PRESIDING JUSTICE

Jose S. Reyes
JUSTICE

LeRoy L. Winston, Jr.
JUSTICE

PROPOSED ORDER PREPARED BY:
Elizabeth M. Bartolucci (#6229137)
O'Hagan Meyer LLC (Firm #60938)
One E. Wacker Dr., Ste. 3400
Chicago, IL 60601
(312) 422-6100
(312) 422-6110 fax
ebartolucci@ohagannmeyer.com

ORDER ENTERED

OCT 18 2024

APPELLATE COURT FIRST DISTRICT

No. 1-24-0557

IN THE
APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT

SAVIAN J. BRIDGES,

Plaintiff-Appellant,

vs.

WAL-MART ASSOCIATES, INC., a/k/a
and d/b/a SAM'S CLUB, INC.,

Defendant-Appellee,

Appeal from Cook County

Circuit No. 2021L010951

Trial Judge: Honorable Mary Colleen
Roberts

Date of Notice of Appeal: March 14, 2024

ORDER

This cause coming to be heard on *Defendant - Appellee's Motion for Extension of Time to File Appellee Brief*, due notice given, it is hereby ordered as follows: a Response having been filed:

1. Defendant/Appellee's motion is **DENIED AS MOOT**.

Bertina Lampkin
PRESIDING JUSTICE

PROPOSED ORDER PREPARED BY:
Elizabeth M. Bartolucci (#6229137)
O'Hagan Meyer LLC (Firm #60938)
One E. Wacker Dr., Ste. 3400
Chicago, IL 60601
(312) 422-6100
(312) 422-6110 fax
ebartolucci@ohaganmeyer.com

ORDER ENTERED

OCT 18 2024

APPELLATE COURT FIRST DISTRICT



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721
(217) 782-2035

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

January 29, 2025

In re: Savian J. Bridges, petitioner, v. Wal-Mart Associates, Inc., etc.,
respondent. Leave to appeal, Appellate Court, First District.
131169

The Supreme Court today DENIED the Petition for Leave to Appeal in the above entitled cause.

The mandate of this Court will issue to the Appellate Court on 03/05/2025.

Very truly yours,

Cynthia A. Grant

Clerk of the Supreme Court



SUPREME COURT OF ILLINOIS

SUPREME COURT BUILDING
200 East Capitol Avenue
SPRINGFIELD, ILLINOIS 62701-1721

CYNTHIA A. GRANT
Clerk of the Court

(217) 782-2035
TDD: (217) 524-8132

April 08, 2025

FIRST DISTRICT OFFICE
160 North LaSalle Street, 20th Floor
Chicago, IL 60601-3103
(312) 793-1332
TDD: (312) 793-6185

Savian J. Bridges
1040 West 88th Street
Chicago, IL 60620

In re: Bridges v. Wal-Mart Associates, Inc.
131169

Today the following order was entered in the captioned case:

Motion by Petitioner, *pro se*, for leave to file a motion for reconsideration of the order denying petition for leave to appeal. Denied.

Order entered by the Court.

This Court's mandate shall issue forthwith to the Appellate Court, First District.

Very truly yours,

Cynthia A. Grant

Clerk of the Supreme Court

cc: Appellate Court, First District
Elizabeth M. Bartolucci

**Additional material
from this filing is
available in the
Clerk's Office.**