

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604

Submitted July 14, 2026*

Decided July 14, 2026

BeforeMICHAEL B. BRENNAN, *Chief Judge*KENNETH F. RIPPLE, *Circuit Judge*JOSHUA P. KOLAR, *Circuit Judge*

No. 25-1747

JACQUALINE S. JARJU,
*Plaintiff-Appellant,**v.*ST. JOHN'S HOSPITAL OF THE
HOSPITAL SISTERS OF THE THIRD
ORDER OF ST. FRANCIS,
*Defendant-Appellee.*Appeal from the United States District
Court for the Central District of Illinois.

No. 23-cv-3038

Colleen R. Lawless,
Judge.

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

ORDER

Jacqueline Jarju sued her former employer, St. John's Hospital of the Hospital Sisters of the Third Order of St. Francis, for wrongful termination and failure to accommodate her disability in violation of the Americans with Disabilities Act. *See* 42 U.S.C. §§ 12101–12213. The district court entered summary judgment for St. John's. Seeing no error, we affirm.

In July 2021, St. John's hired Jarju as a cook and cashier. Three days later, Jarju injured her ankle while at work. She told management that she needed time off to seek treatment, so management removed her from the work schedule until she could have her ankle evaluated.

Around the same time, representatives from human resources accused Jarju of taking food from the cafeteria without payment or approval. Jarju admitted to taking the food but said that a coworker gave it to her.

About a month later, Jarju requested accommodations for medical conditions that existed before she was hired. Specifically, she requested lifting restrictions, an ergonomic chair, and additional breaks. She also submitted a doctor's note that outlined her symptoms but did not explain whether Jarju needed any specific accommodations. Multiple representatives from human resources asked Jarju to follow up with her doctor to clarify the requested accommodations, and Jarju said that she was working on getting the necessary documentation. In September 2021, Jarju submitted letters from her doctor requesting that she receive medical leave and stating that she would need to be restricted to sedentary work for one month. Based on the letter, St. John's assigned Jarju to tasks she could do while sitting.

Later that month, Jarju again was accused of taking food from the hospital. This time, Jarju was working at the security desk when someone delivered two bags of food for a patient. One of the bags contained chicken wings and some of the wings spilled onto the counter. Jarju cleaned up the mess and placed the wings in her personal bag. A security guard witnessed the event and reported it to human-resources staff, who reviewed video footage of Jarju placing the food in her bag and leaving the building with it. In October 2021, representatives from human resources confronted Jarju about the incident. She admitted that she took the food home, but she claimed that she threw it away because it was not safe to eat. A representative from human resources filed a report, and Jarju was fired because of repeated food theft.

Jarju then filed this lawsuit *pro se*, alleging that St. John's failed to accommodate her disabilities and fired her in retaliation for asserting her rights under the Americans with Disabilities Act. *See* 42 U.S.C. §§ 12101–12213.

Jarju unsuccessfully moved the district court to recruit counsel several times. The court denied Jarju's first motion because she did not explain her efforts to secure counsel on her own or why she was unable to represent herself. Jarju moved again for counsel, but the court denied the motion because Jarju "has a college degree and appears competent to represent herself through the pretrial stages of this litigation." In a third motion, Jarju pointed to her medical challenges, power outages after storms, a security breach preventing her from obtaining legal files, and the overwhelming legal complexities of her case. The court denied the motion, expressing doubt that Jarju made reasonable efforts to secure an attorney and determining that Jarju's education level and filings to that point showed that she could handle this relatively straightforward case. The court therefore decided not to draw from the limited pool of attorneys willing to accept *pro bono* cases. The court summarily denied Jarju's fourth motion for counsel because she did not suggest any reason to reconsider the court's prior order.

Meanwhile, St. John's twice moved for sanctions. It alleged that Jarju had not completed initial disclosures, had failed to comply with court orders, and was delaying the proceedings. The court denied the first motion based on Jarju's *pro se* status and the fact that she had not been explicitly warned of potential consequences for failing to complete initial disclosures. But after Jarju missed more deadlines for initial disclosures and discovery, St. John's moved again for sanctions. A magistrate judge recommended imposing a \$500 sanction, concluding that dismissal would be unduly harsh and that the cost of attorneys' fees would likely exceed Jarju's ability to pay. The district judge adopted the recommendation but reduced the sanction to \$100.

St. John's then moved for summary judgment. It argued that no reasonable jury could conclude that Jarju was fired for any reason other than her pattern of stealing food or that St. John's was responsible for a breakdown in the interactive process of accommodating her disability. In response, Jarju did not refute any of St. John's arguments or proposed facts.

The district court granted the motion and entered judgment in favor of St. John's. Accepting St. John's proposed facts as true, *see* C.D. ILL. R. 7.1(D)(2)(b)(6), the court concluded that Jarju failed to show that she was singled out for an adverse action that similarly situated employees did not suffer, that her accommodation requests were the reason for her firing, or that St. John's failed to engage in the interactive process.

On appeal, Jarju challenges the summary judgment, the denials of her motions for counsel, and the imposition of sanctions. She also argues that the cumulative effect of these errors requires vacatur. St. John's counters that, because Jarju did not reference in her notice of appeal the district court's orders denying counsel and imposing sanctions, we lack jurisdiction to consider those arguments on appeal.

But St. John's misunderstands Rule 3 of the Federal Rules of Appellate Procedure. "The notice of appeal encompasses all orders that, for purposes of appeal, merge into the designated judgment or appealable order. It is not necessary to designate those orders in the notice of appeal." FED. R. APP. P. 3(c)(4); *see also Luevano v. Wal-Mart Stores, Inc.*, 722 F.3d 1014, 1019 (7th Cir. 2013) ("The general rule is that an appeal from a final judgment allows the appellant to challenge any interlocutory actions by the district court along the way toward that final judgment."). We therefore have jurisdiction to consider all of Jarju's arguments.

Jarju challenges the district court's resolution of certain factual disputes against her at summary judgment, including whether she intended to dispose of the chicken wings and whether St. John's denied her accommodation requests. But Jarju effectively admitted to St. John's proposed facts when she failed to respond to them. C.D. ILL. R. 7.1(D)(2)(b)(6); *see McCurry v. Kenco Logistics Servs.*, 942 F.3d 783, 786–87 (7th Cir. 2019). And regardless, she provides no explanation of how these factual disputes would change the outcome of the case.

Jarju also challenges the district court's denials of her requests for counsel. She argues that the complexity of the case, including written discovery, depositions, and a multi-issue motion for summary judgment, exceeded her capacity as a pro se litigant who lacks legal training. "We review the handling of the motion[s] for an abuse of discretion and ask whether the district court 'applied the correct legal standard and reached a reasonable decision based on facts supported by the record.'" *Austin v. Hansen*, 139 F.4th 604, 606–07 (7th Cir. 2025) (quoting *Pruitt v. Mote*, 503 F.3d 647, 658 (7th Cir. 2007) (en banc)). Here, the district court properly exercised its discretion by considering Jarju's efforts to secure counsel, her education and filings, the complexity of the case, and the limited supply of time from volunteer lawyers. *See McCaa v. Hamilton*, 959 F.3d 842, 844–45 (7th Cir. 2020).

Jarju also argues that the district court erred by imposing a \$100 sanction without considering her indigence. "[W]e review all discovery sanctions for abuse of discretion and will uphold a district court's decision so long as it could be considered reasonable." *James v. Hyatt Regency Chi.*, 707 F.3d 775, 784 (7th Cir. 2013) (alteration in original)

No. 25-1747

Page 5

(quoting *Collins v. Illinois*, 554 F.3d 693, 696 (7th Cir. 2009)). Here, the district court acted well within its discretion in determining the sanction amount. The magistrate judge considered Jarju's ability to pay when she recommended a sanction of \$500 instead of the cost of attorneys' fees. And the district judge then further reduced the sanction to \$100.

Lastly, Jarju argues that we should remand the case based on the cumulative effect of the alleged errors. But without any errors, this argument fails.

AFFIRMED