

Bond Case Briefs

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MUNICIPAL ORDINANCE - ILLINOIS

Paramount Media Group, Inc. v. Village of Bellwood

United States Court of Appeals, Seventh Circuit - July 16, 2019 - F.3d - 2019 WL 3161843

Commercial property lessee brought action challenging the validity of a village ordinance banning new billboard permits, and seeking damages and injunctive relief.

The United States District Court granted summary judgment in favor of village. Lessee appealed.

The Court of Appeals held that:

- Claim for injunctive relief was rendered moot by lessee's loss of lease agreement;
- First Amendment and due process claims accrued, for limitations purposes, on the date the ordinance was enacted;
- Lessee was not similarly-situated to competitor, as required to support equal protection claim;
- Village was entitled to immunity from Sherman Act claims; and
- Village's municipal limits did not qualify as "relevant market," as required to support lessee's actual monopoly claim.