

NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 25-2659

GEORGIA THOMPSON-EL,
Appellant

v.

GREEN BROOK TOWNSHIP, Municipal Corporation of the State of New Jersey;
ANTHONY PEPE, Police Officer; LAWRENCE TOWNSHIP, Municipal Corporation of
the State of New Jersey; JOSEPH RADLINSKY; JOHN DOES 1 THROUGH 99

On Appeal from the United States District Court
for the District of New Jersey
(D.C. Civil Action No. 3:19-cv-14253)
District Judge: Honorable Georgette Castner

Submitted Pursuant to Third Circuit LAR 34.1(a)
July 9, 2026

Before: HARDIMAN, FREEMAN, and SCIRICA,* *Circuit Judges*

(Opinion filed September 17, 2026)

OPINION**

PER CURIAM

* The Honorable Anthony J. Scirica was unavailable to participate in the decision in this case after submission to the merits panel. This opinion is filed by a quorum of the panel pursuant to 28 U.S.C. § 46(d) and 3d Cir. I.O.P. 12.1(b).

** This disposition is not an opinion of the full Court and pursuant to I.O.P. 5.7 does not constitute binding precedent.

Appellant Georgia Thompson-El appeals from the District Court's order granting summary judgment in favor of Appellees Lawrence Township and Detective Joseph Radlinsky and dismissing an unnamed John Doe supervisor. For the reasons below, we will affirm the District Court's judgment.

I.

The action arose out of allegations that Georgia Thompson-El stole credit and debit cards at two restaurants in 2017 and her subsequent arrest on bench warrants. Thompson-El initiated this civil rights action in 2019 against Lawrence Township, Lawrence Township detective Joseph Radlinsky, Green Brook Township, Green Brook police officer Anthony Pepe, and John Doe defendants. She alleged violations of 42 U.S.C. § 1983 and New Jersey state law.

According to Thompson-El's complaint, a patron at a Zoe's Kitchen location in New Jersey reported that someone stole his credit cards in April 2017. Lawrence Township police investigated the alleged theft and attempted to identify the suspects. Radlinsky then charged Thompson-El and a male suspect with New Jersey state crimes of theft of movable property and credit card theft.

After Thompson-El failed to appear at a post-indictment arraignment for the Lawrence case, a bench warrant was issued. Another bench warrant was also issued in her Green Brook case. As Thompson-El concedes, she was arrested on these warrants during a traffic stop. After the traffic stop, Thompson-El was incarcerated in April 2018.

The Lawrence Township and Green Brook Township charges were dismissed in Fall 2018.

Thompson-El then filed a complaint in the United States District Court for the District of New Jersey, raising claims for damages against Lawrence Township, Detective Joseph Radlinsky, and an unnamed John Doe supervisor.¹ Thompson-El brought claims of unlawful arrest, unlawful imprisonment, and malicious prosecution under the Fourth and Fourteenth Amendments of the U.S. Constitution against Detective Radlinsky. She brought federal constitutional claims under the Fourth and Fourteenth Amendments against Lawrence Township. Thompson-El also brought supervisory liability claims against a John Doe supervisor under 42 U.S.C. § 1983 and common law. Lastly, she brought claims against all Lawrence Defendants for false arrest and false imprisonment, malicious prosecution, and violations of the New Jersey Civil Rights Act. Lawrence Township and Radlinsky jointly moved for summary judgment, which the District Court granted in their favor. Thompson-El timely appealed.

II.

We have jurisdiction under 28 U.S.C. § 1291. We exercise plenary review over the District Court's grant of summary judgment. *Blunt v. Lower Merion Sch. Dist.*, 767 F.3d 247, 265 (3d Cir. 2014). Summary judgment is appropriate "if the movant shows

¹ Thompson-El also brought claims against Green Brook Township, Officer Pepe, and unnamed Green Brook John Doe defendants (collectively, "Green Brook Defendants"). After the District Court partially granted the Green Brook Defendants' motion for summary judgment, Thompson-El settled with the Green Brook Defendants. Her appeal here is limited to Lawrence Township and Detective Radlinsky.

that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” Fed. R. Civ. P. 56(a). A genuine dispute of material fact exists if the evidence is sufficient for a reasonable factfinder to return a verdict for the nonmoving party. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986).

On appeal, Thompson-El asserts that the District Court improperly resolved a material issue of disputed fact when it determined that probable cause existed. Thompson-El also asserts that the District Court improperly disregarded testimony that Detective Radlinsky knew her race prior to the identification process. Lastly, she asserts that Lawrence Township has municipal liability because it lacks “formal training on eyewitness identification.” However, Thompson-El failed to develop her assertions in her opening brief, so all of her claims could be deemed forfeited. *In re Wettach*, 811 F.3d 99, 115 (3d Cir. 2016). Nevertheless, we provide an explanation of why summary judgment was appropriate here.

III.

In order to succeed on the false arrest, false imprisonment, and malicious prosecution claims, Thompson-El needed to establish an absence of probable cause. *See Harvard v. Cesnalis*, 973 F.3d 190, 199, 202–03 (3d Cir. 2020). Here, Thompson-El was arrested on the basis of a bench warrant after she did not appear at an arraignment. This bench warrant formed the basis for probable cause for her arrest. *In re Grand Jury Proceedings Harrisburg Grand Jury 79-1*, 658 F.2d 211, 214 (3d Cir. 1981) (“The simple fact of nonappearance provide[s] the government with probable cause to apply for

a bench warrant.... The authority of a court to issue bench warrants to arrest [persons] who fail to appear is, in fact, unquestioned.”). *See also United States v. Spencer*, 684 F.2d 220, 223 (2d Cir. 1982) (holding that a bench warrant provided the police with the authority to seize the defendant). As the District Court properly explained, the only exception to this is where a judge has been deceived. *Egervary v. Young*, 366 F.3d 238, 248 (3d Cir.2004). However, Thompson-El does not challenge the validity of the bench warrant generally or specifically allege that deception was involved in its issuance. Because probable cause formed the basis of her arrest, the District Court properly granted summary judgment for Detective Radlinsky on all three claims.²

Accordingly, we will affirm the judgment of the District Court. We deny Appellees’ requests for oral argument. *See* 3d Cir. LAR 34.1(a).

² For the same reason, Thompson-El’s state law claims against the Lawrence Defendants fail. *Mesgleski v. Oraboni*, 748 A.2d 1130, 1138 (App. Div. 2000) (“the existence of probable cause will nevertheless defeat [claims of false arrest and false imprisonment]”); *Brunson v. Affinity Fed. Credit Union*, 972 A.2d 1112, 1118 (2009) (naming probable cause as “the essence” of a malicious prosecution claim). And because we perceive no constitutional violation, her municipal claim fails as well. *See Monell v. New York City Dept. of Social Services*, 436 U.S. 658, 694 (1978).