

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
MISSISSIPPI, ABERDEEN DIVISION

Charles Lewis v. MMC Materials, Inc. and John Does 1-10

Lewis v. MMC Materials · No. 1:24-cv-00188-GHD-DAS · Decided April 20, 2026

SUMMARY

The United States District Court for the Northern District of Mississippi grants MMC Materials, Inc.’s motion for summary judgment in Charles Lewis’s racial discrimination action under 42 U.S.C. § 1981. The court concludes that Lewis cannot establish a prima facie case because he was offered the same opportunity to return to truck-driving duties as two similarly situated white employees, who accepted the offer while Lewis resigned. The court dismisses Lewis’s remaining claim.

CASE DETAILS

COURT	United States District Court for the Northern District of Mississippi, Aberdeen Division
JURISDICTION	United States District Court for the Northern District of Mississippi, Aberdeen Division
DECIDED	April 20, 2026
DOCKET	1:24-cv-00188-GHD-DAS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant MMC Materials moved for summary judgment on the plaintiff's remaining racial-discrimination claim under 42 U.S.C. § 1981.
STANDARD OF REVIEW	Summary judgment is proper when the pleadings, discovery materials, and affidavits show no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court must resolve factual controversies in favor of the nonmoving party when an actual evidentiary controversy exists, but conclusory allegations, unsubstantiated assertions, and a scintilla of evidence are insufficient.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Charles Lewis v. MMC Materials, Inc., John Does 1-10

TOPICS

- racial discrimination
- civil rights
- summary judgment
- employment discrimination
- civil procedure

PRACTICE AREAS

employment law

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether MMC was entitled to summary judgment on Lewis's claim that MMC violated 42 U.S.C. § 1981 by racially discriminating against him through an alleged demotion.
2. Whether Lewis could establish a prima facie case of racial discrimination by showing that he was treated less favorably than similarly situated employees outside his protected class.

HOLDINGS

1. MMC was entitled to summary judgment because Lewis could not establish a prima facie case of racial discrimination.
2. Summary judgment was proper because no genuine dispute of material fact remained and MMC was entitled to judgment as a matter of law.

KEY QUOTATIONS

“To prevail [in a §1981 action], a plaintiff must initially plead and ultimately prove that, but for race, [he] would not have suffered the loss of a legally protected right.”

“The Court finds there is no genuine issue of material fact with respect to the Plaintiff’s claim for racial discrimination under Section 1981, and the Defendant MMC is entitled to judgment as a matter of law on that claim.”

FACTUAL BACKGROUND

Charles Lewis, an African-American male, worked as a truck driver for MMC Materials beginning in August 2015. In January 2021, Lewis and two white male truck drivers were placed in dispatcher positions on a trial basis, with the option to return to truck-driving positions if the arrangement did not work out. After all three were removed from the dispatcher positions for unsatisfactory performance, the two white employees returned to truck driving, while Lewis resigned instead of returning.

PROCEDURAL HISTORY

Charles Lewis filed an employment-discrimination action against MMC Materials, Inc. and John Does 1-10. His sole remaining claim alleged that MMC racially discriminated against him by demoting him. The district court granted MMC's motion for summary judgment and dismissed the remaining claim.

DISPOSITION

dismissed

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322, 324 (1986)

- Manning v. Chevron Chem. Co., LLC, 332 F.3d 874, 877 (5th Cir. 2003)
- Wyatt v. Hunt Plywood Co., 297 F.3d 405, 408 (5th Cir. 2002)
- Littlefield v. Forney Indep. Sch. Dist., 268 F.3d 275, 282 (5th Cir. 2001)
- Willis v. Roche Biomedical Labs., Inc., 61 F.3d 313, 315 (5th Cir. 1995)
- Antoine v. First Student, Inc., 713 F.3d 824, 830 (5th Cir. 2013)
- Boudreaux v. Swift Transp. Co., Inc., 402 F.3d 536, 540 (5th Cir. 2005)
- Hathaway v. Bazany, 507 F.3d 312, 319 (5th Cir. 2007)
- Turner v. Baylor Richardson Medical Center, 476 F.3d 337, 343 (5th Cir. 2007)
- Green v. State Bar of Tex., 27 F.3d 1083, 1086 (5th Cir. 1994)
- Comcast Corp. v. National Ass'n of African Am.-Owned Media, 589 U.S. 327, 333, 341 (2020)
- Randle v. PNC Fin. Servs. Grp., No. 24-11048, 2025 WL 3012286, at *2 (5th Cir. Oct. 28, 2025)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792, 802 (1973)
- St. Mary's Honor Ctr. v. Hicks, 509 U.S. 502, 509 (1993)
- Price v. Fed. Express Corp., 283 F.3d 715, 720 (5th Cir. 2002)
- Muldrow v. City of St. Louis, Missouri, 601 U.S. 346, 354, 359 (2024)