

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

Kow-Ching Chang v. Mississippi State University

Civil No. 1:25-cv-0017-MPM-RP (N.D. Miss. Apr. 23, 2026) · No. Civil No. 1:25-cv-0017-MPM-RP · Decided
April 23, 2026

SUMMARY

This order addresses Mississippi State University’s motion for summary judgment in a pro se Title VII national-origin discrimination and retaliation action brought by Kow-Ching Chang. The court discusses Eleventh Amendment immunity, the McDonnell Douglas framework, and evidence concerning the university’s restrictions on Chang’s supervisory authority and removal as director of a laboratory. The provided text ends before the court’s final disposition of the motion.

CASE DETAILS

COURT	United States District Court for the Northern District of Mississippi, Oxford Division
WRITING FOR THE COURT	Michael P. Mills
JURISDICTION	United States District Court for the Northern District of Mississippi, Oxford Division
DECIDED	April 23, 2026
DOCKET	Civil No. 1:25-cv-0017-MPM-RP
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment under Federal Rule of Civil Procedure 56 on plaintiff's Title VII national-origin discrimination and retaliation claims after discovery closed. Plaintiff, proceeding pro se, opposed the motion.
STANDARD OF REVIEW	Summary judgment is proper under Federal Rule of Civil Procedure 56 when the record shows no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. In evaluating the Title VII claims, the court applied the McDonnell Douglas burden-shifting framework and reviewed whether plaintiff presented substantial evidence that MSU's legitimate reasons were pretextual.
PRECEDENTIAL VALUE	unpublished

TOPICS

title vii

employment discrimination

retaliation

summary judgment

civil procedure

PRACTICE AREAS

employment law

civil rights

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether MSU was entitled to summary judgment on Chang's Title VII national-origin discrimination claim.
2. Whether MSU was entitled to summary judgment on Chang's Title VII retaliation claim.
3. Whether the summary-judgment record showed that MSU's stated reasons for limiting Chang's supervisory authority and removing him as director were pretexts for discrimination or retaliation.
4. Whether the timing of the alleged protected activity and adverse employment actions supported a prima facie retaliation claim.

HOLDINGS

1. MSU was entitled to summary judgment because the record strongly supported its legitimate, nondiscriminatory reason for disciplining Chang—credible reports of serious supervisory misconduct—and Chang failed to show that the reason was pretextual.
2. MSU was entitled to summary judgment on Chang's retaliation claim because the alleged fourteen- to fifteen-month interval between his protected activity and the adverse employment actions was insufficient, standing alone, to establish the required causal inference, and Chang independently failed to show that MSU's misconduct-based explanation was pretextual.
3. The court stated that Chang could not pursue a procedural due process claim under § 1983 against MSU because Eleventh Amendment immunity barred such claims against the university as an arm of the State of Mississippi.

KEY QUOTATIONS

“In the Title VII context, the crucial issue is not whether the abusive behavior actually occurred, but, rather, whether MSU’s disciplinary actions against plaintiff were motivated by a genuine belief that they did occur.”

“Ultimately, in order to survive a motion for summary judgment, a plaintiff must show ‘a conflict in substantial evidence’ on the question of whether the employer would not have taken the adverse employment action but for the protected activity.”

FACTUAL BACKGROUND

Chang, a tenured professor and director of MSU's Experimental Seafood Processing Laboratory, was the subject of repeated complaints alleging bullying, intimidation, verbal abuse, and unprofessional treatment of employees and visiting scholars. MSU administrators investigated the complaints, progressively limited Chang's supervisory authority, and ultimately removed him as laboratory director after additional complaints. Chang alleged that the disciplinary actions were motivated by his Asian ancestry and retaliation for internal discrimination complaints, while MSU maintained that the actions were based on credible reports of misconduct.

PROCEDURAL HISTORY

Chang sued Mississippi State University alleging Title VII national-origin discrimination and retaliation, along with an ADEA age-discrimination claim and arguments concerning disciplinary procedures. The court previously dismissed the ADEA claim based on Eleventh Amendment immunity and declined at that time to resolve the Title VII claims pending discovery. After discovery, the court granted MSU's motion for summary judgment on the Title VII claims and directed that a separate judgment be entered under Rule 58.

DISPOSITION

other

CASES CITED

- Jagandan v. Giles, 538 F.2d 1166, 1173-78 (5th Cir. 1976)
- Kimel v. Fla. Bd. of Regents, 528 U.S. 62, 91 (2000)
- McGarry v. Univ. of Miss. Med. Ctr., 355 F. App'x 853, 856 (5th Cir. 2009)
- Fitzpatrick v. Bitzer, 427 U.S. 445 (1976)
- Quern v. Jordan, 440 U.S. 332 (1979)
- Arredondo v. Schlumberger Ltd., 583 F. Supp. 3d 783, 800-01 (W.D. Tex. 2022)
- Alvarado v. Tex. Rangers, 492 F.3d 605, 611 (5th Cir. 2007)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792, 802-04 (1973)
- Reeves v. Sanderson Plumbing Prods., Inc., 530 U.S. 133, 142 (2000)
- St. Mary's Honor Ctr. v. Hicks, 509 U.S. 502, 509 (1993)
- Fisher v. Lufkin Indus., Inc., 847 F.3d 752, 757 (5th Cir. 2017)
- Zamora v. City of Houston, 798 F.3d 326, 331 (5th Cir. 2015)
- Parker v. Louisiana Department of Education Special School District, 323 F. App'x 321, 327 (5th Cir. 2009)
- Brown v. Wal-Mart Stores East, L.P., 969 F.3d 571, 577 (5th Cir. 2020)
- Univ. of Tex. Sw. Med. Ctr. v. Nassar, 570 U.S. 338, 362 (2013)
- Thomas v. Johnson, 788 F.3d 177, 179 (5th Cir. 2015)
- Musser v. Paul Quinn Coll., 944 F.3d 557, 561 (5th Cir. 2019)
- Hernandez v. Yellow Transp., Inc., 670 F.3d 644, 658 (5th Cir. 2012)
- Allen v. United States Postal Serv., 63 F.4th 292, 305 (5th Cir. 2023)

