

COURT OF APPEALS OF IOWA

Dennis Lloyd Smith, individually and as conservator for Molly Burgess Smith v. Catholic Health Initiatives-Iowa Corp. d/b/a MercyOne Des Moines Medical Center, Sariah Steed, R.N.

No. 24-0993 (Iowa Ct. App. Dec. 3, 2025) · No. No. 24-0993 · Decided December 3, 2025

SUMMARY

The Iowa Court of Appeals affirmed summary judgment for Catholic Health Initiatives-Iowa Corp., doing business as MercyOne Des Moines Medical Center, and nurse Sariah Steed on Dennis Smith’s defamation claim. The court held that Steed’s characterization of Smith as “yelling” in his wife’s medical records was a non-actionable opinion or supportable interpretation of the encounter rather than an actionable statement of fact.

CASE DETAILS

COURT	Court of Appeals of Iowa
WRITING FOR THE COURT	Buller, Judge; Tabor, C.J.; Greer, J.; Buller, J.
JURISDICTION	Iowa Court of Appeals
DECIDED	December 3, 2025
DOCKET	No. 24-0993
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed from the district court's grant of summary judgment to the defendants on his defamation claim.
STANDARD OF REVIEW	Summary judgment rulings are reviewed for correction of errors at law.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Dennis Lloyd Smith, individually and as conservator for Molly Burgess Smith v. Catholic Health Initiatives-Iowa Corp. d/b/a MercyOne Des Moines Medical Center, Sariah Steed, R.N.

TOPICS

- defamation
- summary judgment
- standard of review
- appellate procedure
- civil procedure

PRACTICE AREAS

defamation torts civil procedure appellate procedure

QUESTIONS PRESENTED

1. Whether Steed's descriptions of Smith as yelling in the medical records were actionable statements of fact or nonactionable opinions.
2. Whether defendants were entitled to summary judgment on Smith's defamation claim.

HOLDINGS

1. Steed's descriptions of Smith as yelling were nonactionable opinions rather than actionable statements of fact.
2. Defendants were entitled to judgment as a matter of law because the undisputed facts established that the challenged statements were not actionable.

KEY QUOTATIONS

"Opinion is absolutely protected under the first amendment." (3)

"We elect to follow the only on-point authority presented to us and affirm the district court's conclusion that Steed's statements were not actionable." (4)

"On these undisputed facts, the defendants were entitled to judgment as a matter of law." (4)

FACTUAL BACKGROUND

Smith's wife was receiving care from Catholic Health Initiatives-Iowa Corp., doing business as MercyOne Des Moines Medical Center. During an encounter involving nurse Sariah Steed's provision of nursing care, Steed recorded in the wife's medical records that Smith was yelling, continued to yell, and yelled at her. Smith disputed the characterization, asserting that he did not raise his voice, although he admitted that he was baited into a quarrel, cut the discussion short, called it the most idiotic discussion he had ever had, and became exasperated.

PROCEDURAL HISTORY

Smith filed suit in 2021 asserting tort claims personally and purportedly on behalf of his wife. The claims brought on behalf of his wife were dismissed as void because Smith engaged in the unauthorized practice of law. The district court granted defendants summary judgment on Smith's personal defamation claim, concluding that statements describing Smith as yelling were nonactionable opinions, denied Smith's motion to reconsider, and Smith appealed.

DISPOSITION

affirmed

CASES CITED

- Slaughter v. Des Moines Univ. Coll. of Osteopathic Med., 925 N.W.2d 793, 800 (Iowa 2019)
- Jones v. Palmer Commc'ns, Inc., 440 N.W.2d 884, 891-92 (Iowa 1989)
- Jones v. Minneapolis Pub. Schs., No. C1-02-1523, 2003 WL 1962062, at *6 (Minn. Ct. App. Apr. 29, 2003)
- Hunter v. Hartman, 545 N.W.2d 699, 707 (Minn. Ct. App. 1996)
- Moldea v. N.Y. Times Co., 22 F.3d 310, 315, 317 (D.C. Cir. 1994)

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