

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Claudia Sanders v. Kootenai Hospital District d/b/a Kootenai Health

Sanders · No. 2:24-cv-00186-AKB · Decided February 20, 2026

SUMMARY

The United States District Court for the District of Idaho grants Kootenai Hospital District’s motion for summary judgment in Claudia Sanders’s employment-related action. The court rejects Sanders’s First Amendment and Idaho public-policy claims, finding that her workplace religious and Holocaust-related speech was not protected and that Kootenai’s administrative interests outweighed her interests. The court also concludes that Sanders cannot establish defamation, and addresses her claim for intentional infliction of emotional distress.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Idaho                                                                                                                                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Amanda K. Brailsford                                                                                                                                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the District of Idaho                                                                                                                                                                                                                                                                                                                                   |
| DECIDED               | February 20, 2026                                                                                                                                                                                                                                                                                                                                                                        |
| DOCKET                | 2:24-cv-00186-AKB                                                                                                                                                                                                                                                                                                                                                                        |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                    |
| PROCEDURAL POSTURE    | Defendant moved for summary judgment on all five causes of action. Plaintiff did not respond. The court considered the material facts alleged by Defendant undisputed and granted summary judgment.                                                                                                                                                                                      |
| STANDARD OF REVIEW    | Summary judgment is proper when the pleadings, discovery, and affidavits show no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court viewed facts and reasonable inferences in the light most favorable to Sanders, while treating Kootenai's properly supported uncontested material facts as undisputed under the local rule. |
| PRECEDENTIAL VALUE    | Unknown; memorandum decision and order from a federal district court, with no reporter citation or precedential designation stated in the source.                                                                                                                                                                                                                                        |
| PARTIES               | Claudia Sanders v. Kootenai Hospital District d/b/a Kootenai Health                                                                                                                                                                                                                                                                                                                      |

TOPICS

summary judgment

wrongful termination

first amendment

defamation

due process

## PRACTICE AREAS

employment law

constitutional law

civil rights

torts

civil procedure

health law

## QUESTIONS PRESENTED

1. Whether Sanders's discussions about the Holocaust and prayers with patients constituted protected First Amendment speech or activity.
2. Whether Kootenai's administrative and Establishment Clause interests outweighed any First Amendment interests Sanders had in the speech.
3. Whether Sanders's termination violated Idaho's public-policy exception to at-will employment.
4. Whether Kootenai defamed Sanders through the termination notice.
5. Whether Kootenai's conduct was sufficiently extreme and outrageous to support an intentional-infliction-of-emotional-distress claim.
6. Whether Kootenai deprived Sanders of a Fourteenth Amendment liberty interest without a name-clearing hearing by placing the termination notice in her employee file.

## HOLDINGS

1. Sanders did not engage in protected First Amendment speech because her conduct did not address a matter of public concern and was made pursuant to, or in the course of performing, her duties as a crisis-center nurse rather than as a private citizen.
2. Even assuming Sanders spoke as a citizen on a matter of public concern, Kootenai's interests in workplace discipline, effective public healthcare, avoiding disruption, and avoiding the appearance of government-sponsored religious endorsement outweighed Sanders's asserted interests.
3. Sanders could not establish Idaho's public-policy exception to at-will employment because she did not engage in constitutionally protected speech or activity causally connected to her termination.
4. Sanders failed to establish defamation because she did not show that Kootenai communicated the termination notice to a third party; alternatively, any such communication was protected by the common-interest privilege and was not made with express malice.
5. Sanders's termination and placement of the notice in her employee file were not extreme and outrageous conduct sufficient to support an IIED claim.
6. The termination notice did not implicate Sanders's Fourteenth Amendment liberty interest because it did not effectively exclude her from her chosen profession, and the alleged reputational injury was insufficient.

## KEY QUOTATIONS

“Defendant Kootenai’s Motion for Summary Judgment (Dkt. 37) is GRANTED.” (18)

“Plaintiff Claudia Sanders’ Complaint (Dkt. 1-2) is DISMISSED WITH PREJUDICE.” (18)

## FACTUAL BACKGROUND

Kootenai Health, a public healthcare provider, employed Sanders as an at-will licensed practical nurse at the Northern Idaho Crisis Center from March 2021 until August 2, 2023. After investigating complaints that Sanders made inappropriate comments to patients and coworkers, including comments about the Holocaust and religion and statements concerning race, gender identity, domestic violence, and suicide, Kootenai substantiated most allegations and terminated her. Kootenai gave Sanders a termination notice and offered an administrative review, which she did not request; Sanders later obtained another LPN position three weeks after applying.

## PROCEDURAL HISTORY

Sanders sued Kootenai Health after her termination, asserting First Amendment speech and religion claims, wrongful termination in violation of public policy, defamation, intentional infliction of emotional distress, and Fourteenth Amendment due process. Kootenai removed the action to federal court and moved for summary judgment. Sanders did not oppose the motion, and the court granted it and dismissed the complaint with prejudice.

## DISPOSITION

other

## CASES CITED

- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 250 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323 (1986)
- Dodge v. Evergreen School District #114, 56 F.4th 767, 776, 778 (9th Cir. 2022)
- Howard v. City of Coos Bay, 871 F.3d 1032, 1044 (9th Cir. 2017)
- Pickering v. Board of Education, 391 U.S. 563, 568-70 (1968)
- Berry v. Department of Social Services, 447 F.3d 642, 649 (9th Cir. 2006)
- Connick v. Myers, 461 U.S. 138, 146-52 (1983)
- City of San Diego v. Roe, 543 U.S. 77, 80, 83-84 (2004)
- Lane v. Franks, 573 U.S. 228, 242 (2014)
- Garcetti v. Ceballos, 547 U.S. 410, 418, 421, 423 (2006)
- Hawkins v. Department of Public Safety & Correctional Services, 602 A.2d 712, 717-18 (Md. 1992)
- Rankin v. McPherson, 483 U.S. 378, 385, 390-92 (1987)
- Posey v. Lake Pend Oreille School District No. 84, 546 F.3d 1121, 1127 n.2 (9th Cir. 2008)
- Kennedy v. Bremerton School District, 597 U.S. 507, 525 (2022)
- Johnson v. Poway Unified School District, 658 F.3d 954, 968 (9th Cir. 2011)
- Waters v. Churchill, 511 U.S. 661, 681 (1994)
- McEvoy v. Spencer, 124 F.3d 92, 103 (2d Cir. 1997)
- Santa Fe Independent School District v. Doe, 530 U.S. 290, 302-06 (2000)
- Lee v. Weisman, 505 U.S. 577, 596-99 (1992)

- County of Allegheny v. ACLU, 492 U.S. 573, 593-94 (1989)
- Town of Greece v. Galloway, 572 U.S. 565 (2014)
- Bollinger v. Fall River Rural Electric Co-op., Inc., 272 P.3d 1263, 1269, 1271, 1274 (Idaho 2012)
- Venable v. Internet Auto Rent & Sales, Inc., 329 P.3d 356, 361 (Idaho 2014)
- Edmondson v. Shearer Lumber Products, 75 P.3d 733, 738, 741 (Idaho 2003)
- Lockhart v. Idaho Department of Fish & Game, 903 P.2d 135, 141 (Idaho Ct. App. 1995)
- Gardner v. Evans, 719 P.2d 1185, 1195 (Idaho 1986)
- Clark v. The Spokesman-Review, 163 P.3d 216, 219 (Idaho 2007)
- Siercke v. Siercke, 476 P.3d 376, 385-86 (Idaho 2020)
- Wilson v. St. Luke's Regional Medical Center, Ltd., No. 13-CV-00122-BLW, 2014 WL 7186811, at \*14 (D. Idaho Dec. 16, 2014)
- Barlow v. International Harvester Co., 522 P.2d 1102, 1113 (Idaho 1974)
- Steele v. Spokesman-Review, 61 P.3d 606, 609 (Idaho 2002)
- Wiemer v. Rankin, 790 P.2d 347, 356 (Idaho 1990)
- Harte-Hanks Communications, Inc. v. Connaughton, 491 U.S. 657, 688 (1989)
- Nation v. Idaho Department of Correction, 158 P.3d 953, 968 (Idaho 2007)
- Wenger v. Monroe, 282 F.3d 1068, 1074 (9th Cir. 2002)
- Llamas v. Butte County College District, 238 F.3d 1123, 1129 (9th Cir. 2001)
- Cox v. Roskelley, 359 F.3d 1105, 1110 (9th Cir. 2004)
- Blantz v. California Department of Corrections & Rehabilitation, 727 F.3d 917, 925 (9th Cir. 2013)
- Stretten v. Wadsworth Veterans Hospital, 537 F.2d 361, 365-66 (9th Cir. 1976)
- Paul v. Davis, 424 U.S. 693, 708-09 (1976)