

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

Bridgett C. Alexander v. Hernan Sanchez Trejo

Alexander v. Sanchez Trejo · No. 1:23-cv-101-SA-DAS · Decided June 22, 2026

SUMMARY

The United States District Court for the Northern District of Mississippi considers the defendant’s motion for summary judgment on the plaintiff’s remaining Mississippi defamation, specifically slander, claim. The dispute concerns a comment allegedly made by the defendant, a physician, to the plaintiff, a hospital nursing director, regarding how she obtained her professional title and degree. The court analyzes whether the statement was defamatory, whether it was privileged, and whether the plaintiff established special harm or slander per se.

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	June 22, 2026
DOCKET	1:23-cv-101-SA-DAS
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on the plaintiff's remaining Mississippi defamation claim after removal from state court and dismissal of the intentional infliction of emotional distress claim.
STANDARD OF REVIEW	Summary judgment is appropriate when the evidence reveals no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. The evidence and reasonable inferences must be viewed in the light most favorable to the nonmoving party, but conclusory allegations, speculation, and unsubstantiated assertions do not create a genuine issue for trial.
PRECEDENTIAL VALUE	Unknown
PARTIES	Bridgett C. Alexander v. Hernan Sanchez Trejo

TOPICS

defamation

summary judgment

civil procedure

torts

PRACTICE AREAS

defamation

civil procedure

torts

QUESTIONS PRESENTED

1. Whether the disputed statement, viewed in the light most favorable to Alexander, was capable of constituting defamatory slander under Mississippi law.
2. Whether Sanchez established a qualified privilege for the statement as a matter of law.
3. Whether Alexander presented sufficient evidence of special harm to create a genuine dispute of material fact on the fourth element of slander.

HOLDINGS

1. Summary judgment was inappropriate because a genuine dispute existed regarding the words Sanchez used, and Alexander's version of the question could be understood as accusing her of obtaining her professional title through sexual conduct. The statement therefore had the capacity to injure her reputation and could constitute actionable slander.
2. Sanchez was not entitled to summary judgment based on qualified privilege because he failed to show that the communication concerned a subject in which he had an interest or duty, and he identified no competent summary-judgment evidence supporting the asserted privilege.
3. Alexander presented sufficient evidence to create a genuine dispute regarding special harm because she submitted evidence of medical treatment and pharmaceutical expenses allegedly resulting from the statement.

KEY QUOTATIONS

“The Court finds that it is capable of “diminish[ing] the esteem, respect, goodwill or confidence in which... [Alexander] is held, or to excite adverse, derogatory or unpleasant feelings or opinions against [her].””

“In sum, the Court finds that summary judgment is not appropriate as to Alexander’s defamation claim.¹¹”

FACTUAL BACKGROUND

Alexander, a nursing director with a Doctorate of Nursing Practice, and Sanchez, a colorectal surgeon, worked at the same Mississippi hospital. At a hospital nursing station, Sanchez asked Alexander who she slept with in connection with the professional title displayed on her scrubs; the parties disputed the precise wording and Sanchez's intended meaning. Third parties witnessed the exchange, Alexander reported it to hospital administrators, received medical and counseling treatment afterward, and submitted evidence of medical and pharmaceutical expenses.

PROCEDURAL HISTORY

Alexander filed state-law claims for defamation and intentional infliction of emotional distress in the Circuit Court of Lowndes County, Mississippi. Sanchez removed the action to federal district court based on diversity jurisdiction. The court previously dismissed the intentional infliction of emotional distress claim and allowed the defamation claim to proceed. The court denied Sanchez's motion for summary judgment on the remaining claim, allowing it to proceed to trial.

DISPOSITION

other

CASES CITED

- Nabors v. Malone, 2019 WL 2617240, at *1 (N.D. Miss. June 26, 2019)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322-24 (1986)
- Waste Management of Louisiana, LLC v. River Birch, Inc., 920 F.3d 958, 964 (5th Cir. 2019)
- Reingold v. Swiftships, Inc., 126 F.3d 645, 646 (5th Cir. 1997)
- TIG Insurance Co. v. Sedgewick James of Washington, 276 F.3d 754, 759 (5th Cir. 2002)
- Klocke v. Watson, 936 F.3d 240, 244 (5th Cir. 2019)
- Hanna v. Plumer, 380 U.S. 460, 465 (1965)
- Fagan v. Faulkner, 396 So. 3d 1112, 1117-18 (Miss. 2024)
- Barmada v. Pridjian, 989 So. 2d 359, 362 (Miss. 2008)
- Speed v. Scott, 787 So. 2d 626, 631-32 (Miss. 2001)
- Dollar General Corp. v. Dobbs, 409 So. 3d 569, 573 (Miss. 2025)
- Pope v. Martin, 354 So. 3d 362, 376 (Miss. Ct. App. 2023)
- Perkins v. Littleton, 270 So. 3d 208, 216 (Miss. Ct. App. 2018)
- Johnson v. Delta-Democrat Publishing Co., 531 So. 2d 811, 814 (Miss. 1988)
- Lawrence v. Evans, 573 So. 2d 695, 698 (Miss. 1990)
- Asbury Automotive Group, Inc. v. Gooding, 2021 WL 3572669, at *6 (S.D. Miss. Aug. 11, 2021)
- Journal Publishing Co. v. McCullough, 743 So. 2d 352, 360 (Miss. 1999)
- Fulton v. Mississippi Publishers Corp., 498 So. 2d 1215, 1216 (Miss. 1986)
- Inland Family Practice Center, LLC v. Amerson, 256 So. 3d 586, 590-91 (Miss. 2018)
- Cook v. Wallot, 172 So. 3d 788, 798 (Miss. Ct. App. 2015)
- McFadden v. U.S. Fidelity & Guaranty Co., 766 So. 2d 20, 23-24 (Miss. Ct. App. 2000)