

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Rebecca Scofield v. Ashley Guillard

Scofield v. Guillard · No. 3:22-cv-00521-REP · Decided January 23, 2026

SUMMARY

The United States District Court for the District of Idaho ruled on three pretrial motions in Rebecca Scofield’s defamation action against Ashley Guillard. The court partly granted and partly denied the motion to exclude expert testimony, limiting Rebecca Tallent’s opinions while allowing Rebecca Bohn to testify regarding her treatment of Scofield. The court also granted Scofield’s motions for a protective order and in limine, including barring evidence or argument concerning the truth of the defamatory statements because liability had already been established and the trial would address damages.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Raymond E. Patricco
JURISDICTION	United States District Court for the District of Idaho
DECIDED	January 23, 2026
DOCKET	3:22-cv-00521-REP
DISPOSITION	other
PROCEDURAL POSTURE	Pretrial memorandum decision and order resolving the defendant's motion to exclude expert testimony and the plaintiff's motions for a protective order and in limine relief in a defamation action in which liability had previously been established on summary judgment.
STANDARD OF REVIEW	Expert admissibility under Federal Rule of Evidence 702 and Daubert; protective-order relief for abuse, embarrassment, oppression, or undue burden under Federal Rule of Civil Procedure 26(c); and motions in limine are reviewed as preliminary evidentiary determinations committed to the district court's discretion.
PRECEDENTIAL VALUE	unpublished

TOPICS

- expert testimony
- daubert standard
- motion in limine
- defamation

PRACTICE AREAS

evidence

defamation

civil procedure

damages

QUESTIONS PRESENTED

1. Whether Rebecca Tallent was qualified to provide expert testimony concerning general principles of reputation and the effects of online defamatory statements on academic professionals.
2. Whether Tallent's specific opinions that Scofield suffered reputational harm of a particular severity or duration were sufficiently reliable under Federal Rule of Evidence 702.
3. Whether Rebecca Bohn was qualified and sufficiently reliable to testify about Scofield's PTSD diagnosis, treatment, prognosis, and need for continued treatment.
4. Whether Scofield demonstrated good cause for a protective order governing confidential medical and financial records under Federal Rule of Civil Procedure 26(c).
5. Whether evidence or argument concerning the truth of Guillard's defamatory statements was relevant or admissible at the damages-only trial.

HOLDINGS

1. Tallent was qualified to testify about general principles of reputation and public relations and how defamatory social-media statements may affect an academic's professional reputation, but she could not testify that Scofield was in fact damaged, suffered reputational harm to a particular degree, or would suffer future reputational harm from Guillard's conduct.
2. Bohn was qualified and sufficiently reliable under Rule 702 to testify about her treatment of Scofield, Scofield's PTSD diagnosis, symptoms, treatment history, prognosis, and need for continued treatment, including the relationship between the diagnosis and the alleged defamatory conduct.
3. Scofield demonstrated good cause for a protective order limiting dissemination of confidential medical and financial records, subject to individualized judicial review if the materials are later offered at trial.
4. Because liability had already been established and the trial was limited to damages, Guillard could not present evidence or argument concerning the purported truth or factual basis of the defamatory statements, absent further permission from the court.

KEY QUOTATIONS

"She may not, however, testify that Plaintiff was in fact damaged, that Plaintiff suffered reputational harm to a particular degree, or that Plaintiff will suffer future reputational harm as a result of Defendant's actions." (Section II.A.2)

"Unless otherwise permitted, Defendant shall not present evidence or argument at trial concerning the purported truth of the defamatory statements involved in this case." (Section II.C)

FACTUAL BACKGROUND

Scofield, a University of Idaho professor, alleged that Guillard disseminated TikTok and YouTube videos falsely accusing her of an affair with one of four murdered students and of ordering the murders. The court had already determined on partial summary judgment that the statements were false and defamatory, leaving damages as the remaining trial issue. Scofield identified Rebecca Tallent to address reputational harm and Rebecca Bohn, her treating mental-health provider, to address psychological injury and treatment needs. The parties also disputed protection of sensitive medical and financial records and whether Guillard could present evidence concerning the truth of the defamatory accusations.

PROCEDURAL HISTORY

Rebecca Scofield sued Ashley Guillard for defamation based on statements alleging that Scofield had an affair with one of the murdered University of Idaho students and orchestrated the murders. The court previously granted Scofield partial summary judgment on liability and allowed her to amend to seek punitive damages. Before the damages trial, Guillard moved to exclude two experts, and Scofield moved for a protective order and to preclude evidence concerning the truth of the defamatory statements. The court granted the protective-order and motion-in-limine requests and granted the motion to exclude in part while denying it in part.

DISPOSITION

other

CASES CITED

- Daubert v. Merrell Dow Pharms., Inc., 509 U.S. 579 (1993)
- Hyer v. City and Cnty. of Honolulu, 118 F.4th 1044, 1055 (9th Cir. 2024)
- Elosu v. Middlefork Ranch Inc., 26 F.4th 1017, 1024 (9th Cir. 2022)
- Primiano v. Cook, 598 F.3d 558, 565 (9th Cir. 2010)
- Kumho Tire Co. v. Carmichael, 526 U.S. 137, 142, 150 (1999)
- United States v. Hankey, 203 F.3d 1160, 1167 (9th Cir. 2000)
- Hardy v. Kish, 2025 WL 2051775, at *3 (D. Idaho 2025)
- Stevens v. Lee, 2024 WL 729960, at *8 (D. Idaho 2024)
- Sepe v. Gordon Trucking, Inc., 755 Fed. Appx. 668, 670 (9th Cir. 2019)
- In re Roman Cath. Archbishop of Portland in Oregon, 661 F.3d 417, 424 (9th Cir. 2011)
- United States v. Heller, 551 F.3d 1108, 1111 (9th Cir. 2009)
- City of Pomona v. SQM N. Am. Corp., 866 F.3d 1060, 1070 (9th Cir. 2017)
- C&E Servs., Inc. v. Ashland Inc., 539 F. Supp. 2d 316, 323 (D.D.C. 2008)
- Ohler v. United States, 529 U.S. 753, 758 n.3 (2000)
- Luce v. United States, 469 U.S. 38, 41 n.4 (1984)