

IN THE COURT OF APPEALS OF THE STATE OF MISSISSIPPI

NO. 2025-CP-01133-COA

ANTHONY J. HUDSON

APPELLANT

v.

**GIN CREEK PUBLISHING INC. D/B/A LAUREL
LEADER-CALL**

APPELLEE

DATE OF JUDGMENT:	07/22/2025
TRIAL JUDGE:	HON. JEFF WEILL SR.
COURT FROM WHICH APPEALED:	JONES COUNTY CIRCUIT COURT, SECOND JUDICIAL DISTRICT
ATTORNEY FOR APPELLANT:	ANTHONY J. HUDSON (PRO SE)
ATTORNEY FOR APPELLEE:	JOHN ANTHONY PIAZZA
NATURE OF THE CASE:	CIVIL - TORTS-OTHER THAN PERSONAL INJURY & PROPERTY DAMAGE
DISPOSITION:	AFFIRMED - 09/29/2026
MOTION FOR REHEARING FILED:	

BEFORE BARNES, C.J., McDONALD AND WEDDLE, JJ.

WEDDLE, J., FOR THE COURT:

¶1. On March 31, 2025, Anthony Hudson filed a pro se complaint against Gin Creek Publishing Inc. (doing business as Laurel Leader-Call), alleging that they racially discriminated against him. Hudson claimed that Laurel Leader-Call “deliberately distorted the news” from Laurel City Council meetings “to only reflect the concerns of white counterparts.” Hudson sought \$500,000 in damages and injunctive relief.

¶2. On April 9, 2025, Laurel Leader-Call filed its answer and a motion to dismiss pursuant to Mississippi Rule of Civil Procedure 12(b)(6), asserting Hudson’s lawsuit was “frivolous and completely unsupported by any recognized legal theory or cause of action.”

On April 22, 2025, after Laurel Leader-Call had published an editorial criticizing Hudson and the lawsuit, Hudson sought leave to amend his complaint to add a defamation claim. Hudson alleged that the editorial damaged his mayoral campaign by describing his lawsuit as “looney,” calling Hudson a “race-baiter,” “idiot,” and a “ridiculous human being,” and criticizing him as a “serial filer.”

¶3. On July 22, 2025, the Jones County Circuit Court granted Laurel Leader-Call’s motion to dismiss and denied Hudson’s amended complaint, finding that (1) Hudson’s lawsuit failed to state a claim for relief which can be granted, and (2) the amended complaint failed procedurally in that the relief sought was not properly before the court.¹ On August 7, 2025, Hudson filed a motion for reconsideration, which the circuit court later denied. Hudson appeals, asserting the circuit court erred by denying his motion to amend his complaint and dismissing his defamation claim. Finding no reversible error, we affirm.

FACTS AND PROCEDURAL HISTORY

¶4. Hudson, a mayoral candidate at the time, filed suit against Jim Cegielski, Laurel Leader-Call, and ABC Insurance Company, seeking \$500,000 in damages and injunctive relief.² In his complaint, Hudson alleged a Laurel Leader-Call reporter regularly attended

¹ On appeal, Hudson acknowledged that the discrimination claim against Laurel Leader-Call was not actionable. In his brief, Hudson admitted “that after research, plaintiff cannot find any legal citations that would aid in his claim of discrimination against the Leader Call.” The discrimination claim was the sole issue in his complaint, which the circuit court dismissed. Therefore, the only issue before this Court is the trial court’s denial of Hudson’s motion for reconsideration.

² He also named Ben and Erin Napier in his suit, but they were voluntarily dismissed. Hudson admittedly relied upon an “AI” search that erroneously named them as owners.

Laurel City Council meetings and intentionally omitted or distorted concerns raised by Hudson, a self-described “activist in the city of Laurel,” and other Black citizens. Hudson stated in his complaint that he complained to the newspaper (Laurel Leader-Call) about its “intentional and deliberate reporting of white citizens’ concerns and ignoring and neglecting not to print black citizens’ concerns.” Hudson further asserted that the newspaper’s conduct constituted racial discrimination against him as a member of a protected class and amounted to gross negligence because the alleged reporting practices prevented important community concerns from reaching the public.

¶5. Hudson attached to his complaint a screenshot of comments on a Facebook post between him and Mark Thornton, Laurel Leader-Call’s former editor-in-chief.³ Thornton sarcastically commented, “Anthony Hudson Yes, I always ‘paid’ more attention to whites’ concerns, and that was a real challenge, considering that four of the seven council members, the mayor and all but one of the department heads are black. Thanks for noticing! Pull your head out of your a** and maybe you’ll stop seeing only one color.” Hudson responded, “Mark Thornton Is you crazy man. I will see you in court. So you were only concerned to white issues just like I said and ignored and censored our news. That was discriminatory. You are a pitiful Soul. How many whites complained about you censoring their community concerns. Keep your mouth closed because you are digging a bigger hole for your publisher.”

¶6. On April 9, 2025, Laurel Leader-Call filed an answer denying all the allegations in Hudson’s complaint. Laurel Leader-Call also moved to dismiss the complaint, asserting that

³ Hudson did not provide any context about what the comments were in response to.

Hudson failed to state a claim for which relief could be granted under Rule 12(b)(6). Additionally, Laurel Leader-Call alleged that Hudson had filed fifteen frivolous lawsuits, and his current complaint was a “continuation of [Hudson]’s abuse of the judicial system in that the Complaint is frivolous and fails to state a claim upon which relief may be granted.”

¶7. After Hudson filed his complaint, the Laurel Leader-Call published an editorial titled “Looney Lawsuit.” The editorial criticized Hudson for filing the lawsuit and referred to him as an “Al Sharpton wannabe,” “attention seeker,” “race-baiter,” having “grammar on the level of a kindergarten student,” “stupid,” “a blooming idiot,” “not intellectually capable of sensing sarcasm,” and a “ridiculous human being.”

¶8. In response to the editorial, on April 22, 2025, Hudson filed a motion for leave to file an amended complaint, reasserting the claims he previously raised and asserting a claim for slander and libel. He argued that Laurel Leader-Call’s statements were defamatory and meant to harm his reputation and damage his mayoral campaign.⁴ On July 22, 2025, the circuit court granted Laurel Leader-Call’s motion to dismiss pursuant to Rule 12(b)(6) and denied Hudson’s motion for leave to amend. The circuit court found that Hudson’s lawsuit failed to state a claim for which relief can be granted, and his amended complaint sought an injunction and equitable relief that failed procedurally because these claims were not properly before the court. All outstanding motions were rendered moot.

¶9. The circuit court also noted that the motion for leave failed to attach the proposed

⁴ In response to Hudson’s motion, Laurel Leader-Call attached several exhibits, claiming they showcased “Hudson’s abuse of the legal system” and highlighted a pattern of Hudson filing frivolous lawsuits for twenty years.

amended complaint referenced in the motion. After the court ruling, Hudson filed a motion for reconsideration, primarily alleging that the missing amended complaint was a clerical error on the circuit court clerk's part. According to a declaration of clerical error filed by the clerk on August 12, 2025, Hudson's assertions regarding the attachment of the proposed amended complaint were accurate. On August 26, 2025, the circuit court entered an order denying the motion for reconsideration. The circuit court found that Hudson did not identify any change in controlling law, any relevant evidence, or how the court's order of dismissal would result in manifest injustice.

STANDARD OF REVIEW

¶10. "The grant or denial of a motion for reconsideration is reviewed under an abuse-of-discretion standard." *In re Jex*, 407 So. 3d 1040, 1044 (¶11) (Miss. 2025) (quoting *State v. Walgreen Co.*, 250 So. 3d 465, 477 (Miss. 2018)).

DISCUSSION

¶11. Hudson argues that the circuit court erred in denying his motion for reconsideration. To succeed on a motion for reconsideration, Hudson had to show (i) an intervening change in controlling law, (ii) the availability of new evidence not previously available, or (iii) a need to correct a clear error of law or to prevent manifest injustice. *In re Moore*, 297 So. 3d 316, 323 (¶21) (Miss. Ct. App. 2020). Although the circuit court relied on a clerical error in finding that Hudson failed to attach the proposed amended complaint referenced in his motion for leave to amend, that error did not result in manifest injustice.⁵ On appeal, Hudson

⁵ Moreover, even without the proposed amended complaint, the allegations and arguments set forth in Hudson's motion for leave to amend provided sufficient grounds for

fails to demonstrate any of these factors.

¶12. Instead, Hudson incorrectly contends that his defamation claim would have survived if the circuit court had granted his motion for leave to amend. But even if the amended complaint had been properly attached to his motion for leave to amend, Hudson’s defamation claim would not have survived. It is well established that to prove defamation involving a public figure, a plaintiff must show “(1) a false defamatory statement about the plaintiff, (2) unprivileged publication to a third party, (3) actual malice on behalf of the publisher, and (4) either actionability irrespective of special harm (defamation per se) or the existence of special harm caused by the publication.” *Bryant v. Deep S. Today*, 431 So. 3d 747, 749 (¶4) (Miss. 2026) (quoting *Franklin v. Thompson*, 722 So. 2d 688, 692 (¶12) (Miss. 1998)). The Supreme Court has stated that in order to determine whether a statement is actionable, it is important to distinguish “between genuinely defamatory communications as opposed to obscenities, vulgarities, insults, epithets, name-calling, and other verbal abuse.” *Fagan v. Faulkner*, 396 So. 3d 1112, 1117 (¶15) (Miss. 2024) (quoting Rodney A. Smolla, *Law of Defamation*, § 4:7 (2d ed. 1999)).

¶13. In *Fagan*, the Supreme Court found that insults, name-calling, and vulgar exclamations fall outside the scope of defamation and do not give rise to defamation actions. *Id.* at 1118 (¶18). The court also noted that in order for a statement to be defamatory, it must go beyond insults and into the realm of factual misstatement. *Id.* at 1117 (¶15). In the case before us, as a matter of law, the statements made in Laurel Leader-Call’s editorial were not

the circuit court to deny the motion.

defamatory. The editorial criticized Hudson for filing the lawsuit and referred to him as an “Al Sharpton wannabe,” “attention seeker,” “race-baiter,” having “grammar on the level of a kindergarten student,” “stupid,” “a blooming idiot,” “not intellectually capable of sensing sarcasm,” and a “ridiculous human being.” Thus, because the editorial’s statements amounted to nothing more than insults and name-calling, rather than actionable factual misstatements, Hudson’s defamation claim would have failed as a matter of law.⁶

¶14. Because Hudson’s defamation claim was not actionable, the circuit court’s clerical error did not result in manifest injustice.⁷ Accordingly, we find no abuse of discretion in the circuit court’s decision to deny Hudson’s motion for reconsideration.

CONCLUSION

¶15. Finding the circuit court did not abuse its discretion in denying Hudson’s motion for

⁶ Laurel Leader-Call also called Hudson a “serial filer.” “The threshold question in a defamation suit is whether the published statements are false.” *Armistead v. Minor*, 815 So. 2d 1189, 1194 (¶10) (Miss. 2002). “Truth is a complete defense” to a defamation claim. *Id.* The statements at issue must only be “substantially true.” *Id.* “[M]inor inaccuracies do not amount to falsity so long as ‘the substance, the gist, the sting, of the [defamatory] charge be justified.’” *Id.* Hudson does not dispute that he has filed a substantial number of lawsuits but, instead, argues that those lawsuits were meritorious. Laurel Leader-Call’s characterization of him as a “serial filer” remains substantially true and therefore also cannot support a defamation claim.

⁷ Notably, the circuit court seemingly treated Hudson’s motion as a motion to supplement under Mississippi Rule of Civil Procedure 15(d). Unlike Rule 15(a), Rule 15(d) grants the circuit court discretion to grant the party leave to supplement his pleadings with “events which have happened since the date of the pleading.” *Jackson v. State*, 163 So. 3d 317, 321 (¶13) (Miss. Ct. App. 2015). Because Hudson’s motion asserted an entirely new cause of action based on the editorial, Rule 15(d) applied, leaving the decision whether to permit supplementation to the circuit court’s discretion. Under these circumstances, we find that the circuit court did not err by refusing to allow Hudson to amend or supplement his complaint because the defamation claim was not actionable.

reconsideration, we affirm.

¶16. **AFFIRMED.**

BARNES, C.J., CARLTON AND WILSON, P.JJ., LAWRENCE, EMFINGER AND LASSITTER ST. PÉ, JJ., CONCUR. McDONALD AND McCARTY, JJ., CONCUR IN PART AND IN THE RESULT WITHOUT SEPARATE WRITTEN OPINION. WESTBROOKS, J., CONCURS IN RESULT ONLY WITHOUT SEPARATE WRITTEN OPINION.