

## Checkmate? Chess World Champion Nona Gaprindashvili Takes on Her Biggest Opponent Yet

Released in October of 2020, *The Queen's Gambit* shattered Netflix records when it became the most-watched scripted limited series on the streaming platform, with approximately sixty-two million members watching in the first twenty-eight days following its release [1]. Adapted from the 1983 fiction novel by Walter Tevis, the Netflix limited series follows chess prodigy Elizabeth (Beth) Harmon as she simultaneously battles both addiction and fierce competitors in her journey to become the top chess player in the world [2].

While the wild success of *The Queen's Gambit* is undeniable—the show sat comfortably in Netflix's top ten list in ninety-two countries and won eleven Emmy Awards in 2021—chess world champion Nona Gaprindashvili was anything but pleased with some aspects of the show [3]. Hailed as a pioneer in women's chess, Gaprindashvili noticed striking similarities between herself and protagonist Beth Harmon [4]. More specifically, Gaprindashvili took issue with a line in the series finale episode where a character falsely claimed that Gaprindashvili “never faced men” [5]. During the said dialogue, “the camera pans onto an actor sitting in the audience, watching the game, who is obviously meant to be Gaprindashvili” [6].

Gaprindashvili ultimately filed a \$5 million defamation lawsuit against Netflix in federal court in September of 2021, alleging that the line about her having never faced male competitors is “manifestly false, as well as being grossly sexist and belittling” [7]. Moreover, Gaprindashvili argued that the line has effectively “tarnished (her) personal and professional reputation” [8]. Details of the lawsuit note that Gaprindashvili competed against at least fifty-nine male chess players by 1968, the year in which the episode containing the challenged dialogue takes place [9]. Netflix moved to dismiss the lawsuit, arguing that “no reasonable viewer would have understood the line to convey a statement of fact” because the series is entirely fictional [10]. Additionally, Netflix asserted that the First Amendment awards broad artistic license to the show's creators [11].

However, US District Judge Virginia A. Phillips in the Central District of California disagreed and subsequently denied Netflix's motion to dismiss in January of 2022 [12]. Specifically, Judge Phillips articulated that contrary to Netflix's position that the status of the series as a work of fiction protects the show's depiction of real people, Netflix “created the impression that [it] was asserting objective facts” [13]. Moreover, that the show is fictional in nature does not immunize Netflix from defamation liability if all elements of a defamation claim are otherwise met [14]. Judge Phillips went on to say that “an average viewer easily could interpret the line...as ‘disparaging the accomplishments’ of Gaprindashvili [15]. Netflix has since filed notice of its intent to appeal the decision to the US Court of Appeals for the Ninth Circuit [16].

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[1] <https://www.bbc.com/news/entertainment-arts-60167723>

[2] <https://variety.com/2022/tv/news/netflix-queens-gambit-nona-gaprindashvili-1235165706/>

[3] <https://www.chess.com/news/view/the-queens-gambit-wins-11-emmys-awards>

[4] <https://worldchesshof.org/hof-inductee/nona-gaprindashvili>

[5] <https://www.nbcnews.com/pop-culture/pop-culture-news/queens-gambit-defamation-lawsuit-netflix-can-move-forward-judge-says-rcna13943>

[6] <https://www.rferl.org/a/queen-gambit-lawsuit-georgia-gaprindashvili/31464910.html>

[7] *Id.*

[8] *See* BBC, *supra* note 1.

[9] *See* Maddus, *supra* note 2.

[10] *See* BBC, *supra* note 1.

[11] *Id.*

[12] *See* Maddus, *supra* note 2.

[13] *Id.*

[14] *See* Wong, *supra* note 5.

[15] *See* Maddus, *supra* note 2.

[16] *Id.*