

**IN THE CIRCUIT COURT OF
COLE COUNTY, MISSOURI**

JAKE MAGGARD et al.,

Plaintiffs,

v.

STATE OF MISSOURI et al.,

Defendants.

Case No. 25AC-CC09120

**PLAINTIFF GREGG LOMBARDI'S RESPONSES AND OBJECTIONS TO
DEFENDANTS' FIRST INTERROGATORIES**

Pursuant to Rule 57.01, Plaintiff Gregg Lombardi responds to the first interrogatories served by Defendants State of Missouri and Denny Hoskins, in his official capacity as Missouri Secretary of State.

PRELIMINARY STATEMENT

This action involves a narrow legal question: Does the State's unprecedented refusal to suspend House Bill 1 despite the timely receipt of 691 boxes of signed referendum petitions violate Missourians' constitutional rights? None of these interrogatories seeks information that has any bearing on that legal issue. Plaintiff therefore objects to each interrogatory individually and all collectively.

At the hearing on January 8, counsel for Defendants claimed that these interrogatories are intended to obtain information about whether Plaintiffs were recruited by or are acting as proxies for People Not Politicians PNP or its counsel. Given this stated objective, and in the interest of expediting resolution of this action and providing Defendants with responsive information—but without

conceding that any such information is at all relevant to this action or is likely to lead to relevant information, and without waiving any objections—Plaintiff answers these interrogatories accordingly.

GENERAL OBJECTIONS

Plaintiff objects to Defendants' definitions and instructions to the extent they are inconsistent with the Missouri Rules of Civil Procedure. Plaintiff also objects to any use of the terms "each," "all," or "any" as it is not possible to represent that every possible document or response is exhaustive to meet such a request. All production and responses are based upon a reasonable and diligent search conducted by Plaintiff.

RESPONSES AND OBJECTIONS

1. Identify your current address and all addresses at which you have lived during the preceding ten years.

Response: During the preceding ten years, Plaintiff has lived at 815 West 53rd Terrace, Kansas City, Missouri 64112.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad, not proportional to the needs of this action, and unlikely to lead to the discovery of relevant information.

2. Identify your current place of employment, including any self-employment or work as an independent contractor, and all places of employment, self-employment, or independent contractor work in the preceding ten years.

Response: Plaintiff has been employed by Neighborhood Legal Support of Kansas City since December 2016. From January to December, 2016, Plaintiff was employed by Legal Aid of Western Missouri.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad, not proportional to the needs of this action, and unlikely to lead to the discovery of relevant information.

3. Identify all communications between you, your agent(s), or anyone acting on your behalf, and People Not Politicians or any entities or individuals affiliated with People Not Politicians or acting on behalf of People Not Politicians.

Response: Plaintiff has not been contacted about this lawsuit by, been offered assistance regarding this lawsuit by, or discussed the filing of this lawsuit with People Not Politicians or any entities or individuals affiliated with People Not Politicians or acting on behalf of People Not Politicians, nor was Plaintiff recruited as a proxy to bring this lawsuit by People Not Politicians or any entities or individuals affiliated with People Not Politicians or acting on behalf of People Not Politicians. Plaintiff therefore has no communications to that effect.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad and unduly burdensome in that it seeks “all communications,” including communications with no connection or relevance to this action. Plaintiff

further objects to this interrogatory as not proportional to the needs of this action.

Plaintiff further objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory

as seeking information already or equally available to Defendants and/or within

the possession, custody, and control of Defendants or third parties. Plaintiff

further objects to this interrogatory to the extent it seeks information that is

privileged under the First Amendment because disclosure would chill the exercise

of Plaintiff's associational rights, as well as those of other persons with whom

Plaintiff associates for the purpose of organizing around political issues in the State

of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958)

("It is hardly a novel perception that compelled disclosure of affiliation with groups

engaged in advocacy may constitute . . . a restraint on freedom of association

This Court has recognized the vital relationship between freedom to associate and

privacy in one's associations.").

4. Identify all communications between you, your agent(s), or anyone acting on your behalf, and Richard Von Glahn or any entities or individuals affiliated with Richard Von Glahn or acting on behalf of Richard Von Glahn.

Response: Plaintiff has not been contacted about this lawsuit by, been offered assistance regarding this lawsuit by, or discussed the filing of this lawsuit with Richard Von Glahn or any entities or individuals affiliated with Richard Von

Glahn or acting on behalf of Richard Von Glahn, nor was Plaintiff recruited as a proxy to bring this lawsuit by Richard Von Glahn or any entities or individuals affiliated with Richard Von Glahn or acting on behalf of Richard Von Glahn. Plaintiff therefore has no communications to that effect.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad and unduly burdensome in that it seeks "all communications," including communications with no connection or relevance to this action. Plaintiff further objects to this interrogatory as not proportional to the needs of this action.

Plaintiff further objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise of Plaintiff's associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958) ("It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association

This Court has recognized the vital relationship between freedom to associate and privacy in one's associations.”).

5. Identify all communications between you, your agent(s), or anyone acting on your behalf, and Stinson LLP, Charles (“Chuck”) Hatfield, or any entities or individuals affiliated with Stinson LLP or Charles (“Chuck”) Hatfield or acting on behalf of Stinson LLP or Charles (“Chuck”) Hatfield.

Response: Plaintiff has not been contacted about this lawsuit by, been offered assistance regarding this lawsuit by, or discussed the filing of this lawsuit with Stinson LLP, Charles (“Chuck”) Hatfield, or any entities or individuals affiliated with Stinson LLP or Charles (“Chuck”) Hatfield or acting on behalf of Stinson LLP or Charles (“Chuck”) Hatfield, nor was Plaintiff recruited as a proxy to bring this lawsuit by Stinson LLP, Charles (“Chuck”) Hatfield, or any entities or individuals affiliated with Stinson LLP or Charles (“Chuck”) Hatfield or acting on behalf of Stinson LLP or Charles (“Chuck”) Hatfield. Plaintiff therefore has no communications to that effect.

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Plaintiff further objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product

doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise of Plaintiff's associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958)

("It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association

This Court has recognized the vital relationship between freedom to associate and privacy in one's associations.").

6. Identify all persons or entities who contacted you or offered assistance regarding, or discussed, filing this lawsuit.

Response: Plaintiff has not been contacted about this lawsuit by, been offered assistance regarding this lawsuit by, or discussed the filing of this lawsuit with People Not Politicians or any entities or individuals affiliated with People Not Politicians or acting on behalf of People Not Politicians; Richard Von Glahn or any entities or individuals affiliated with Richard Von Glahn or acting on behalf of Richard Von Glahn; Stinson LLP, Charles ("Chuck") Hatfield, or any entities or individuals affiliated with Stinson LLP or Charles ("Chuck") Hatfield or acting on behalf of Stinson LLP or Charles ("Chuck") Hatfield; or Jenner & Block LLP, or any

entities or individuals affiliated with Jenner & Block LLP or acting on behalf of Jenner & Block LLP.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad and unduly burdensome. Plaintiff further objects to this interrogatory as not proportional to the needs of this action. Plaintiff further objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise of Plaintiff's associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958) ("It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association This Court has recognized the vital relationship between freedom to associate and privacy in one's associations.").

7. Describe how you became a plaintiff in this lawsuit.

Response: Plaintiff discussed being a plaintiff in this lawsuit with attorneys from the American Civil Liberties Union of Missouri Foundation.

This response notwithstanding, Plaintiff objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege.

8. Identify any individuals or entities providing funding for this lawsuit.

Response: Funding for this lawsuit has not been provided by People Not Politicians or any entities or individuals affiliated with People Not Politicians or acting on behalf of People Not Politicians; Richard Von Glahn or any entities or individuals affiliated with Richard Von Glahn or acting on behalf of Richard Von Glahn; Stinson LLP, Charles ("Chuck") Hatfield, or any entities or individuals affiliated with Stinson LLP or Charles ("Chuck") Hatfield or acting on behalf of Stinson LLP or Charles ("Chuck") Hatfield; or Jenner & Block LLP, or any entities or individuals affiliated with Jenner & Block LLP or acting on behalf of Jenner & Block LLP.

This response notwithstanding, Plaintiff objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally

available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise of Plaintiff's associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958) ("It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association This Court has recognized the vital relationship between freedom to associate and privacy in one's associations.").

9. Identify all lawsuits to which you have been a party.

Response: Plaintiff has been a party in the following lawsuits:

- Defendant in a personal-injury lawsuit (1995)
- Petitioner in a divorce proceeding (1997)
- Defendant in a speeding-ticket case (1998)
- Defendant in a protective-order case (2011)
- Party in a probate case (2012)
- Plaintiff in a foreclosure action (ongoing)

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad, not proportional to the needs of this action, and unlikely to lead to the discovery of relevant information.

10. Describe your involvement in the referendum petitions challenging HB1, including any volunteer efforts, participation in calls or meetings concerning HB1, collection of signatures, or donations.

Response: Plaintiff signed a petition to refer HB1 to the people for approval or rejection. Plaintiff had no other involvement in the referendum petitions challenging HB1.

This response notwithstanding, Plaintiff objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise of Plaintiff's associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958) ("It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association This Court has recognized the vital relationship between freedom to associate and privacy in one's associations.").

11. Identify all communications between you, your agent(s), or anyone acting on your behalf, and Jenner & Block LLP, or any entities or individuals affiliated with Jenner & Block LLP or acting on behalf of Jenner & Block LLP.

Response: Plaintiff has not been contacted about this lawsuit by, been offered assistance regarding this lawsuit by, or discussed the filing of this lawsuit with Jenner & Block LLP, or any entities or individuals affiliated with Jenner & Block LLP or acting on behalf of Jenner & Block LLP, nor was Plaintiff recruited as a proxy to bring this lawsuit by Jenner & Block LLP, or any entities or individuals affiliated with Jenner & Block LLP or acting on behalf of Jenner & Block LLP. Plaintiff therefore has no communications to that effect.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad and unduly burdensome in that it seeks “all communications,” including communications with no connection or relevance to this action. Plaintiff further objects to this interrogatory as not proportional to the needs of this action. Plaintiff further objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise

of Plaintiff's associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958) ("It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association This Court has recognized the vital relationship between freedom to associate and privacy in one's associations.").

12. Identify all individuals with knowledge of allegations made in the Petition.

Response: Plaintiff identifies the following individuals:

- Plaintiff Jake Maggard
- Plaintiff Gregg Lombardi
- Missouri Secretary of State Denny Hoskins
- Missouri Attorney General Catherine Hanaway
- Missouri Director of Elections Chrissy Peters
- Richard von Glahn

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad and unduly burdensome in that it seeks "all individuals." Plaintiff further objects to this interrogatory as a premature contention interrogatory that seeks a comprehensive identification of relevant facts while discovery is ongoing. Plaintiff further objects to this interrogatory to the extent it seeks information

already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties.

13. Identify all witnesses you intend to call at trial.

Response: At this time, Plaintiff does not intend to call any fact witnesses at trial and believes this action can be resolved solely on the law and judicially noticeable facts.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad in that it seeks the identification of “all witnesses” Plaintiff might call at trial. Plaintiff further objects to this interrogatory on the basis that discovery is ongoing and additional fact witnesses might yet be identified. As there is currently no court-ordered schedule for discovery in this case, Plaintiff has not developed a witness list. Plaintiff reserves the right to supplement his response to this interrogatory at the appropriate time pursuant to any order of the Court or agreement of the parties.

14. Identify all expert witnesses you intend to call at trial, including such expert’s name, address, occupation, place of employment, and qualifications to give an opinion, and state the general nature of the subject matter on which the expert is expected to testify and the expert’s hourly fee.

Response: At this time, Plaintiff does not intend to call any expert witnesses at trial and believes this action can be resolved solely on the law and judicially noticeable facts.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad in that it seeks the identification of “all expert witnesses” Plaintiff might call at trial. Plaintiff further objects to this interrogatory on the basis that discovery is ongoing and additional expert witnesses might yet be identified. As there is currently no court-ordered schedule for discovery in this case, Plaintiff has not developed an expert witness list. Plaintiff reserves the right to supplement his response to this interrogatory at the appropriate time pursuant to any order of the Court or agreement of the parties.

15. Identify all non-retained expert witnesses you intend to call at trial, including such expert’s name, address, and field of expertise.

Response: At this time, Plaintiff does not intend to call any expert witnesses at trial and believes this action can be resolved solely on the law and judicially noticeable facts.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad in that it seeks the identification of “all non-retained expert witnesses” Plaintiff might call at trial. Plaintiff further objects to this interrogatory on the basis that discovery is ongoing and additional expert witnesses might yet be identified. As there is currently no court-ordered schedule for discovery in this case, Plaintiff has not developed an expert witness list. Plaintiff reserves the right to supplement his response to this interrogatory at the appropriate time pursuant to any order of the Court or agreement of the parties.

16. Identify all opinions any non-retained expert intends to offer at trial.

Response: At this time, Plaintiff does not intend to call any expert witnesses at trial and believes this action can be resolved solely on the law and judicially noticeable facts.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad in that it seeks the identification of “all opinions” Plaintiff might solicit at trial. Plaintiff further objects to this interrogatory on the basis that discovery is ongoing and additional expert witnesses might yet be identified. As there is currently no court-ordered schedule for discovery in this case, Plaintiff has not developed an expert witness list. Plaintiff reserves the right to supplement his response to this interrogatory at the appropriate time pursuant to any order of the Court or agreement of the parties

17. Identify all persons or entities who provided you with legal advice, funding, or resources (e.g., investigators, expert witnesses) relating to this lawsuit.

Response: Plaintiff has not received legal advice, funding, or resources (e.g., investigators, expert witnesses) relating to this lawsuit from People Not Politicians or any entities or individuals affiliated with People Not Politicians or acting on behalf of People Not Politicians; Richard Von Glahn or any entities or individuals affiliated with Richard Von Glahn or acting on behalf of Richard Von Glahn; Stinson LLP, Charles (“Chuck”) Hatfield, or any entities or individuals affiliated with Stinson LLP or Charles (“Chuck”) Hatfield or acting on behalf of Stinson LLP or Charles (“Chuck”) Hatfield; or Jenner & Block LLP, or any entities

or individuals affiliated with Jenner & Block LLP or acting on behalf of Jenner & Block LLP.

This response notwithstanding, Plaintiff objects to this interrogatory as overly broad and unduly burdensome in that it seeks “all persons or entities.” Plaintiff further objects to this interrogatory as not proportional to the needs of this action. Plaintiff further objects to this interrogatory as unlikely to lead to the discovery of relevant information. Plaintiff further objects to this interrogatory to the extent it requests information protected by the attorney-client privilege, work-product doctrine, or other applicable privilege. Plaintiff further objects to this interrogatory as seeking information already or equally available to Defendants and/or within the possession, custody, and control of Defendants or third parties. Plaintiff further objects to this interrogatory to the extent it seeks information that is privileged under the First Amendment because disclosure would chill the exercise of Plaintiff’s associational rights, as well as those of other persons with whom Plaintiff associates for the purpose of organizing around political issues in the State of Missouri. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 462 (1958) (“It is hardly a novel perception that compelled disclosure of affiliation with groups engaged in advocacy may constitute . . . a restraint on freedom of association This Court has recognized the vital relationship between freedom to associate and privacy in one’s associations.”).

Respectfully submitted,

**AMERICAN CIVIL LIBERTIES UNION
OF MISSOURI FOUNDATION**

s/ *Tori Schafer*

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Counsel for Plaintiffs

**Pro hac vice*

ATTESTATION

State of Missouri)

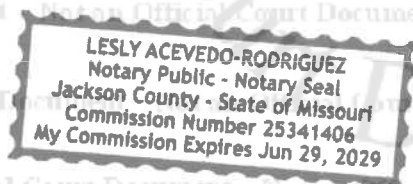
County/City of Jackson,)

ss

Before me, the undersigned authority, personally appeared Gregory Lombardi, who hereby swears on his/her oath or hereby affirms that he/she has read the foregoing interrogatories and his/her answers thereto are true and complete to the best of his/her knowledge, information, and belief.

[Signature]
Signature

Subscribed and sworn before me this 16th day of January, 2026.



[Signature]
Notary Public