

**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 JAKE MAGGARD'S RESPONSES AND OBJECTIONS TO
DEFENDANTS' FIRST INTERROGATORIES**

Pursuant to Rule 57.01, Plaintiff Jake Maggard 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

These interrogatories are a fishing expedition for entirely irrelevant information. 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: Plaintiff has lived at 24 West 70th Street, Kansas City, Missouri 64113, since 2020. Over the past ten years, Plaintiff previously lived at the following addresses:

- 4260 South Norton Avenue, Los Angeles, California 90008 (2019–2020)
- 3415 West 41st Street, Los Angeles, California 90008 (2018–2019)

- 3338 West Martin Luther King Jr. Boulevard, Los Angeles, California 90008 (2015–2018)

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 a self-employed therapist in Kansas City, Missouri, since 2023. Over the past ten years, Plaintiff previously worked at the following places of employment:

- Foster Adopt Connect, Kansas City, Missouri (2022–2025)
- Preferred Family Healthcare, Kansas City, Missouri (2021–2022)
- Los Angeles Unified School District, Los Angeles, California (2019–2020)
- MIQ Digital, Los Angeles, California (2018)
- Viant Inc., Los Angeles, California (2015–2018)

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 was not 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, and 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 was not 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, and 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 was not 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, and 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.").

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

Response: Mr. Maggard has not been contacted about, been offered assistance regarding, 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 was previously involved in litigation against an insurance company stemming from a 2006 accident.

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.

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 was not 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, and 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 its 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 its 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 its 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 its 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: Mr. Maggard 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**

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**Pro hac vice*

ATTESTATION

State of Missouri

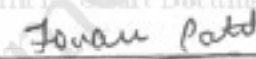
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County/City of Jackson

Before me, the undersigned authority, personally appeared
JACOB MANGARD (JAKE), 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

Subscribed and sworn before me this 14th day of January, 2026.


Notary Public

