

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

ELIZABETH HEALEY, *et al.*,

*Plaintiffs,*

v.

STATE OF MISSOURI, *et al.*,

*Defendants.*

Case No. 2516-CV31273

Division 8

**HEALEY PLAINTIFFS' RESPONSE TO STATE DEFENDANTS' LIST OF  
REDISTRICTING CASES BROUGHT IN COLE COUNTY**

On November 24, 2025, the Court in *Wise v. Missouri*, No. 2516-CV29597, convened the parties in that case for a hearing on several pending motions. Upon consent of all parties in *Wise* and this case, *Healey v. Missouri*, No. 2516-CV31273, the *Healey* Plaintiffs also participated in the hearing, in which the Court considered: (1) the *Wise* and *Healey* Plaintiffs' consent motion in *Wise v. Missouri*, No. 2516-CV29597, to transfer the *Healey* case to Division 15 so that it may be joined with *Wise* for the purposes of any hearings or trials; (2) State Defendants' pending motion to dismiss the *Healey* Plaintiffs' Complaint; and (3) the Missouri Republican State Committee's Motion to Intervene in *Healey*.

During the proceeding, the State Defendants asserted that all challenges to statewide redistricting plans had previously been filed in Cole County. The Court directed the State Defendants to submit a list of cases in support of that proposition by November 26, 2025, and allowed the *Wise* and *Healey* plaintiffs to file a responsive list of cases by December 1, 2025.

The State Defendants assert that they have listed "all redistricting actions of which the State is aware," but the State Defendants failed to list any case challenging statewide redistricting plans—including congressional redistricting plans—which were filed in federal court. Many of

these cases included claims under both state and federal law. These cases are listed below at Part I, along with challenges to local redistricting plans that were filed in federal court at Part II. A challenge to a local redistricting plan that was filed in state court but was not listed in the State Defendants' filing is included at Part III. These cases, along with the cases listed in the second, third, fourth, and fifth sections of the State Defendants' filing, refute the State Defendants' argument that *all* challenges to statewide redistricting plans have been filed in Cole County and collectively demonstrate that the limitations the State Defendants seek to impose upon Plaintiffs' choice of venue in Jackson County simply do not exist under the Missouri Constitution.

#### **I. Challenges to statewide redistricting maps filed in federal court**

- *Berry v. Kander*, 191 F. Supp. 3d 982 (E.D. Mo. 2016) (challenge to 2011 congressional map as violating provisions of the state and federal constitutions)
- *Nash v. Blunt*, 797 F. Supp. 1488 (W.D. Mo. 1992), *aff'd sub nom. Afr. Am. Voting Rts. Legal Def. Fund, Inc. v. Blunt*, 507 U.S. 1015 (1993) (consolidated challenges to 1991 state house map)
- *Shayer v. Kirkpatrick*, 541 F. Supp. 922 (W.D. Mo.), *aff'd sub nom. Schatzle v. Kirkpatrick*, 456 U.S. 966 (1982) (court-ordered congressional redistricting map guided in part by the "State of Missouri Constitution" and "state law" in response to the Missouri General Assembly's failure to enact an apportionment plan after the 1980 decennial census)
- *Preisler v. Sec'y of State of Missouri*, 341 F. Supp. 1158 (W.D. Mo.), *aff'd sub nom. Danforth v. Preisler*, 407 U.S. 901 (1972) (challenge to 1969 third remedial congressional map)
- *Preisler v. Sec'y of State of Missouri*, 279 F. Supp. 952 (W.D. Mo. 1967), *aff'd sub nom. Kirkpatrick v. Preisler*, 394 U.S. 526 (1969) (challenge to 1967 second remedial congressional map)
- *Preisler v. Sec'y of State of Missouri*, 257 F. Supp. 953 (W.D. Mo. 1966), *aff'd sub nom. Kirkpatrick v. Preisler*, 385 U.S. 450 (1967) (challenge to 1965 remedial congressional map)
- *Preisler v. Sec'y of State of Missouri*, 238 F. Supp. 187 (W.D. Mo. 1965) (consolidated challenges to 1961 congressional map)

- *Jonas v. Hearnese*, 236 F. Supp. 699 (W.D. Mo. 1964) (challenge to state house and senate redistricting maps as violating provisions of the state and federal constitutions)

## II. Challenges to local redistricting maps filed in federal court

- *Bowman v. Chambers*, 586 F. Supp. 3d 926 (E.D. Mo. 2022) (challenge to 2021 apportionment of St. Louis County Council Districts as violating provisions of the state and federal constitutions)
- *Stenger v. Kellett*, No. 4:11CV2230 TIA, 2012 WL 601017 (E.D. Mo. Feb. 23, 2012) (challenge to existing St. Louis County Council Districts as violating provisions of the state and federal constitutions after the redistricting commission failed to timely redistrict after the 2010 decennial census)
- *Corbett v. Sullivan*, 202 F. Supp. 2d 972 (E.D. Mo. 2002) (challenge to existing St. Louis County Council Districts as violating provisions of the state and federal constitutions after the redistricting commission failed to timely redistrict after the 2000 decennial census)
- *Afr. Am. Voting Rts. Legal Def. Fund, Inc. v. Villa*, 54 F.3d 1345 (8th Cir. 1995) (challenge to 1991 apportionment of St. Louis alderman districts)
- *Fletcher v. Golder*, No. 91-2314C(7), 1992 WL 100330 (E.D. Mo. Jan. 21, 1992), *amended*, No. 91-2314C(7), 1992 WL 105910 (E.D. Mo. Feb. 24, 1992), *aff'd*, 959 F.2d 106 (8th Cir. 1992) (challenge to existing St. Louis County Council Districts as violating provisions of the state and federal constitutions after the redistricting commission failed to timely redistrict after the 1990 decennial census)
- *Preisler v. Mayor of City of St. Louis, Mo.*, 303 F. Supp. 1071 (E.D. Mo. 1969) (challenge to apportionment ordinances of St. Louis alderman districts)

## III. Additional challenge to local redistricting plan filed outside of Cole County

- *Chapman v. Hoyt*, 549 S.W.2d 869 (Mo. banc 1977) (challenge to division of county into two judicial districts as violating provisions of the state and federal constitutions brought in Livingston County)

Dated: December 2, 2025

/s/ J. Andrew Hirth

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Certificate of Service

I certify that a copy of the foregoing was filed on case.net on December 2, 2025, and served electronically on all counsel of record.

/s/J. Andrew Hirth  
Attorney