

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 11

**STATEMENT OF BASIS FOR JURISDICTION**

Pursuant to Rule 81.08(a), Plaintiffs submit the following explanation of the Supreme Court’s appellate Jurisdiction in this case.

Article V, section 3 of the Missouri Constitution provides that this Court has exclusive jurisdiction over “the validity ... of a statute or provision of the constitution of this state[.]” This case challenges the validity of Missouri’s 2025 congressional redistricting map enacted in House Bill 1 (“H.B. 1” or the “2025 Map”) (codified as §§ 128.345, 128.346, 128.348, 128.471, 128.472, 128.473, 128.474, 128.475, 128.476, 128.477, 128.478, and 128.479) under Article III, § 45 of the Missouri Constitution, which governs congressional redistricting.

On March 12, 2026, the circuit court entered Order and Judgment against Plaintiffs and in favor of Defendants on Count II (Violation of the Compactness Requirement Under Art. III, § 45 of the Missouri Constitution) in the Petition. Count I (Violation of the Timing Requirement for Congressional Redistricting Under Art. III, § 45 of the Missouri Constitution) of Plaintiffs’ Petition was stayed pending a decision in *Luther v. Hoskins*, SC101412, which is pending at the Missouri Supreme Court and raises the same claim as Count I in Plaintiff’s Petition. No evidence was

presented or arguments made to the circuit court related to Count I. On March 16, 2026, Count I of Plaintiffs' Petition was dismissed. All claims in the underlying case have been fully resolved.

Because this case involves the validity of a statute, it falls within the exclusive appellate jurisdiction of the Missouri Supreme Court.

Dated: March 20, 2026

Respectfully submitted,

/s/ J. Andrew Hirth

J. Andrew Hirth, #57807

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CERTIFICATE OF SERVICE

I hereby certify that on March 20, 2026, the foregoing was filed through the Court's electronic filing system to be served electronically on all counsel of record.

/s/ J. Andrew Hirth

