

**CIVIL PROCEDURE FORM NO. 8-A(1)****IN THE 19th JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI**

Judge or Division: Judge Christopher K. Limbaugh	Circuit Court Case Number: 25AC-CC06964		
Plaintiff/Petitioner: Merrie Suzanne Luther, <i>et al.</i>	Appellate Number:	<input type="checkbox"/> Filing as an Indigent	
	Date of Judgment/Decree/Order: (ATTACH A COPY) 12/09/2025	Court Reporter: Candice Perez	
	vs. Date Post Trial Motion Filed: N/A	<input type="checkbox"/> Sound Recording Equipment	
Defendant/Respondent: Denny Hoskins	Date Ruled Upon: N/A	The Record on Appeal will consist of: ____ Legal File only or <input checked="" type="checkbox"/> Legal File and Transcript	
	(Date File Stamp)		

Notice of Appeal to Supreme Court of Missouri

Notice is given that <u>Merrie Suzanne Luther, Kim Randolph Davis, Rebeca Amezuca-Hogan, Kenneth Lawrence Chumbley</u> appeals from the judgment/decree/order entered in this action on <u>December 9, 2025</u> (date).	
Jurisdiction of the Supreme Court is based on the fact that this appeal involves: (Check appropriate box) <input type="checkbox"/> The validity of a treaty or statute of the United States <input checked="" type="checkbox"/> The title to any state office in Missouri <input type="checkbox"/> The punishment imposed is death <input type="checkbox"/> The construction of the revenue laws of Missouri <input checked="" type="checkbox"/> The validity of a statute or provision of the Constitution of Missouri Unless the basis of jurisdiction involves the death penalty, the appellant shall prepare a concise explanation, not to exceed six pages, of the basis for jurisdiction. This must be filed as part of or simultaneously with this notice of appeal. See Rule 81.08(a) and (b).	
Appellant's Name (If multiple, list all or attach additional pages) Merrie Suzanne Luther Kim Randolph Davis Rebeca Amezuca-Hogan Kenneth Lawrence Chumbley	Respondent's Name (If multiple, list all or attach additional pages) Denny Hoskins
Address (Luther) 719 W. High Street, Jefferson City, MO 65101; (Davis) 1844 Southwest Napa Valley Dr., Lee's Summit, MO 64082; (Amezuca-Hogan) 1844 Holly St., Kansas City, MO 64108; (Chumbley) 1841 S. Kings Ave., Springfield, MO 65807	Address 600 W. Main Street, Jefferson City, MO 65101
Appellant's Attorney/Bar Number (If multiple, list all or attach additional pages) Charles W. Hatfield, No. 40363; Alixandra S. Cossette, No. 68114; Alexander C. Barrett, No. 68695; Greta M. Bax, No. 73354; Denise D. Lieberman, No. 47013	Respondent's Attorney/Bar Number (If multiple, list all or attach additional pages) Louis J. Capozzi III, No. 77756; Graham Miller No. 77656, Joseph J. Kiernan No. 77798, Jacqueline Bryant No. 64755

Address (Hatfield, Cossette, Barrett, Bax) 230 W. McCarty Street, Jefferson City, MO 65101 (Lieberman) 6047 Waterman Blvd., St. Louis, MO 63112		Address (Capozzi, Miller, Kiernan) 815 Olive St., Suite 200, St. Louis, MO 63101 (Bryant) 600 W. Main St., Jefferson City, MO 65101	
E-mail Address chuck.hatfield@stinson.com ; alix.cossette@stinson.com ; alexander.barrett@stinson.com ; greta.bax@stinson.com ; denise@movpc.org		E-mail Address Louis.Capozzi@ago.mo.gov ; Graham.Miller@ago.mo.gov ; Joseph.Kiernan@ago.mo.gov ; Jacqueline.Bryant@sos.mo.gov	
Telephone (Hatfield, Cossette, Barrett, Bax) 575-636-6263 (Lieberman) 314-780-1833		Telephone (Capozzi, Miller, Kiernan) 314-340-3413 (Bryant) 573-751-9738	
DOC Register Number (If applicable)			
Does this appeal involve a felony conviction? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Has the defendant been released on an appeal bond? <input type="checkbox"/> Yes (ATTACH BOND) <input checked="" type="checkbox"/> No			
Bond Amount		Surety Name, Address, and Phone Number	
<p align="center">Docket Fee Information</p> <p><input checked="" type="checkbox"/> The docket fee in the amount of \$70.00 is being tendered with this notice of appeal.</p> <p><input type="checkbox"/> No docket fee is being tendered because:</p> <p><input type="checkbox"/> a docket fee is not required by law pursuant to _____ (cite specific statute or other authority).</p> <p><input type="checkbox"/> a motion to prosecute the appeal in forma pauperis has been or will be filed.</p> <p><input type="checkbox"/> a docket fee in the amount of \$70.00 cannot be tendered at this time but will be submitted at a later date or this appeal will be subject to dismissal pursuant to Rule 84.08(a).</p>			
Signature of Attorney or Appellant /s/ Alixandra S. Cossette			Date

I certify that on _____ (date), a copy of the foregoing was sent to the following by facsimile, hand-delivery, electronic mail or U.S. mail postage prepaid to their last known addresses.

Appellant or Attorney for Appellant

Directions to Clerk

As required by Rule 30.01(c), a copy of the notice of appeal shall be sent by the clerk to the Attorney General when the appeal involves a felony. Transmit a copy of the notice of appeal and all attached documents to the clerk of the Supreme Court of Missouri and to any person other than registered users of the eFiling system in a manner prescribed by Rule 43.01. Clerk shall then fill in the memorandum below. See Rule 81.08(i). Forward the docket fee to the Department of Revenue as required by statute.

Memorandum of the Clerk

I have this day served a copy of this notice by ☐ regular mail ☐ registered mail ☐ certified mail ☐ facsimile transmission to each of the following persons at the address stated below. If served by facsimile, include the time and date of transmission and the telephone number to which the document was transmitted.

I have transmitted a copy of the notice of appeal to the clerk of the Supreme Court.

☐ Docket fee in the amount of \$70.00 was received by this clerk on _____ (date) which will be disbursed as required by statute.

☐ No docket fee was received.

☐ NO docket fee was received.

Date _____

Clerk

Additional Parties and Attorneys

List every party involved in the case not listed on page 1, indicate the position of the party in the circuit court (e.g. plaintiff, defendant, intervenor) and in the Supreme Court of Missouri (e.g. appellant or respondent) and the name of the attorney of record, if any, for each party. Attach additional pages to identify all parties and attorneys if necessary.

Party Name	Attorney Name
Missouri Republican State Committee (Intervenor-Respondent)	Marc H. Ellinger, No. 40828
Address	Address
428 E. Capitol Ave	308 E. High Street, Ste. 300
City, State, Zip Code	City, State, Zip Code
Jefferson City, MO 65101	Jefferson City, MO 65101
	E-mail Address
	mellinger@ellingerlaw.com
	Telephone
	573-750-4100
Party Name	Attorney Name
Missouri Republican State Committee (Intervenor-Respondent)	Stephanie S. Bell, No. 61855
Address	Address
428 E. Capitol Ave	308 E. High Street, Ste. 300
City, State, Zip Code	City, State, Zip Code
Jefferson City, MO 65101	Jefferson City, MO 65101
	E-mail Address
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	Telephone
	573-750- 4100
Party Name	Attorney Name
Address	Address
City, State, Zip Code	City, State, Zip Code
	E-mail Address
	Telephone
Party Name	Attorney Name
Address	Address
City, State, Zip Code	City, State, Zip Code
	E-mail Address
	Telephone

IN THE CIRCUIT COURT OF COLE COUNTY

STATE OF MISSOURI

MERRIE SUZANNE LUTHER, *et al.*,

Plaintiffs,

vs.

MISSOURI SECRETARY OF STATE
DENNY HOSKINS,

Defendant.

Case No: 25AC-CC06964

JURISDICTIONAL STATEMENT IN SUPPORT OF PLAINTIFFS'
NOTICE OF APPEAL TO THE MISSOURI SUPREME COURT

Plaintiff-Appellants Merrie Suzanne Luther, Kim Randolph Davis, Rebeca Amezuca-Hogan, and Kenneth Lawrence Chumbley file this jurisdictional

statement in support of their Notice of Appeal to the Missouri Supreme Court.

Rule 81.08. This is an appeal from a judgment denying Plaintiff-Appellants' claim that House Bill 1 is unconstitutional. *See* Judgment, December 9, 2025 ("Given the fact that Section 45 contains no restrictive language, this court concludes that the legislature had the power to enact House Bill 1.").

Because of this, this Court has jurisdiction to consider the substance of the appeal. The Missouri Supreme Court has exclusive appellate jurisdiction to consider "all cases involving the validity of...a statute or provision of the constitution of this state." Mo. Const. art. V, § 3.

Here, the provisions of law at issue purport to draw new congressional districts for the state of Missouri. Plaintiffs sought a declaratory judgment that these provisions are unconstitutional because they violate the directive of Article

III, Section 45 of the Missouri Constitution that redistricting may only occur when a census has been certified to the governor. No census has been certified to the governor since the 2020 census. The circuit court disagreed and found the new provisions of law contained in House Bill 1 constitutional.