

**RELATORS  
PEOPLE NOT  
POLITICIANS, Et Al.  
PETITION FOR  
PROHIBITION  
EXHIBIT 6**

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

PEOPLE NOT POLITICIANS, *et al.*, )  
 )  
 Plaintiffs, )  
 )  
 v. ) Case No. 25AC-CC07128  
 )  
 MISSOURI SECRETARY OF STATE, )  
 )  
 Defendant. )

**INTERVENOR PUT MISSOURI FIRST'S FIRST REQUESTS FOR PRODUCTION TO PLAINTIFFS**

**Definitions**

1. As used in these Requests for Production of Documents, whether capitalized or not:
  - a. "And" means and/or and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope;
  - b. "Communication" means the transmittal of information by any means;
  - d. "Date" means the exact date, month, and year, if ascertainable, or if not, the best approximation of the date (based upon relationship with other events);
  - e. "Document" shall be defined to the broadest extent permitted by the Missouri Rules of Civil Procedure and includes (but is not limited to) any

written note, document, record, meeting or minutes, paper, letter, e-mail, text, correspondence, diary, journal, memorandum, calendar, photograph, tape recording (audio or video), check, bill, printout, receipt, statement, invoice, or any other information whether written, digital, magnetically recorded, electronically stored information, or however recorded or reproduced, including all drafts, copies, or other preliminary material which are different in any way from the executed or final document, regardless of whether designated "confidential," "privileged," or otherwise restricted, wherever located, whether an original or a copy, including, but not limited to electronic mail transmissions or correspondence (deleted and undeleted e-mails), documents stored or transmitted in an electronic form, transcripts and recordings of conversations, telephone calls, voice mail or recordings, agreements, contracts, financial statements, invoices, minutes, work sheets, work papers, summaries, and other written records or recordings of any conferences, meetings, visits, interviews or telephone conversations, financial and statistical data, analyses, surveys, transcripts of testimony, statements, interviews, affidavits, press releases, memoranda, drafts, memo pads, notes, indices, tabulations, graphs, reports, papers, records, intraoffice communication, electronic data processing cards, tapes, print-outs, papers or other recordings, tables, compilations, catalogues, telegrams, letters, photographs, diaries, calendars, drawings, data-reports, printed matter, correspondence, communications received or sent,

books, brochures, advertisements, circulars, mailings and publications; and any copy containing thereon or having attached thereto any alterations, notes, comments, or other material shall be deemed a separate document from the original or any other copy not containing such materials within the foregoing definition. "Document" shall also include all copies that are not identical to the original, such as those bearing marginal comments, alterations or other notations not present on the original document as originally written, typed, or otherwise prepared;

f. "Defendant" means Missouri Secretary of State Denny Hoskins;

a. "Plaintiffs", means People Not Politicians, and Richard Von Glahn the plaintiffs in the first amended petition in the above-captioned Lawsuit, and includes their present or former agents, representatives, attorneys or persons or entities acting on their behalf;

r. "Referendum" or "Referendum Petition" means 2026-R001, 2026-R002, 2026-R003, and/or 2026-R004 filed with the Missouri Secretary of State's office (attached to Plaintiff's First Amended Petition as Exhibit A).

s. "Regarding", "Relating to", or "Pertaining to", when used with respect to a document, agreement, subject, or fact, means embodying, containing, evidencing, reflecting, reciting, recording, supporting, refuting, or referring to, and that constitute, contain, support, modify, contradict, criticize, discuss, mention, describe, record, report, reflect, pertain to, were prepared in

connection with, cast doubt upon, or arise in any way from that document, agreement, subject, or fact;

t. “Relate” means refers or pertains to, reflects, concerns, or is in any way logically or factually connected with, or which may afford any information regarding the matters discussed therein;

u. “Validity Report” means any document indicating whether or not a signature might be determined by a local election authority or by the Secretary of State as valid or invalid (for example, due to the signature being a registered voter, a registered voter at a different address, not registered, wrong signature, other district, or duplicate signature as those terms are set forth in 15 CSR 30-15.020).

### INSTRUCTIONS

1. You are required to answer separately the following requests for production of documents (“Request” or “Requests”) within thirty (30) days of service of these Requests as provided by Missouri Rule of Civil Procedure 58.01.

2. These Requests extend to all documents in your possession, custody, or control, including documents in the possession of your spouse, attorneys, investigators, agents, or other representatives, without regard to the current physical location of such documents or to whether such documents

were created by you or by others, including documents you obtained from another source pursuant to authorizations, subpoena, or otherwise.

3. With respect to any document responsive hereto which was but is no longer in your possession or subject to your control, you shall submit a statement setting forth as to each such document what disposition was made of it.

4. With respect to each document requested, produce the entire document, along with all attachments, appendices and exhibits, and all drafts of such documents.

5. If you object to any part or aspect of any Request, you must state such objection with specificity and provide documents in response to all other parts or aspects of the Request.

6. If you object to furnishing any document(s) responsive to any of these Requests on the basis of attorney-client privilege, attorney work product or otherwise, state the existence of the document, identify the specific grounds on which your objection is based (e.g., attorney work product, attorney-client privilege), and produce a privilege log. If, for grounds other than a claim of privilege, you refuse to furnish any documents responsive to these document requests, state the grounds upon which the refusal is based with sufficient specificity to permit determination of the propriety of such refusal. If any



objected-to document contains non-objectionable material, you must disclose the non-objectionable material.

7. In the event you object to any Request on the basis that it is overbroad, please respond to that Request in such a manner as to tender it not overbroad in your opinion and state the extent to which you have narrowed that Request for purposes of your response.

8. Each Request is to be read to be inclusive rather than exclusive. Accordingly, the words “and” and “or” should be construed in the conjunctive or in the disjunctive as necessary to make the request inclusive rather than exclusive. “Including” means “including but not limited to.” The past tense includes the present tense and the present tense includes the past tense where necessary to make the document request inclusive rather than exclusive. The singular includes the plural, and the plural includes the singular where necessary to make the document request inclusive rather than exclusive. Words in the masculine, feminine or neutral form shall include each of the other genders. The term “any” includes the term “all” and the term “all” includes the term “any” where necessary to make the document request inclusive rather than exclusive.

### **Requests for Production**

1. Produce copies of all signed petition pages for the referendum petitions as referred to as Exhibit A to the Plaintiffs’ First Amended Petition

for Declaratory Judgment and Injunctive Relief filed in the above-captioned matter which were signed before September 28, 2025.

**RESPONSE:**

2. Produce copies of all signed petition pages for the referendum petitions as referred to as Exhibit A to the Plaintiffs' First Amended Petition for Declaratory Judgment and Injunctive Relief filed in the above-captioned matter which were signed after September 28, 2025 but before October 14, 2025.

**RESPONSE:**

3. Produce copies of all of the "approximately 70,200 signatures of support of the referendum petition" as referred to in Paragraph 32 of the Joint Stipulation of Facts filed in the above-captioned matter.

**RESPONSE:**

4. Produce copies of all of the "approximately 32,600 signatures of support of the referendum petition" as referred to in Paragraph 29 of the Joint Stipulation of Facts filed in the above-captioned matter.

**RESPONSE:**

5. Produce copies of all of the "more than 20,000 signatures of Missouri voters supporting the referendum on House Bill 1" as referred to in Paragraph 57 of the Plaintiffs' First Amended Petition for Declaratory Judgment and Injunctive Relief filed in the above-captioned matter.



**RESPONSE:**

6. Produce all copies of signed referendum petitions that have been filed with the Defendant which you claim have been or will be rejected.

**RESPONSE:**

7. Produce a copy of the referendum petition or petitions that are being circulated by Plaintiffs or on Plaintiffs' behalf.

**RESPONSE:**

8. Produce any and all copies of any contracts for collection of signatures for the referendum petition or petitions that are being circulated by Plaintiffs or on Plaintiffs' behalf.

**RESPONSE:**

9. Produce any and all copies of any validity report regarding the signatures collected for the referendum petition or petitions that are being circulated by Plaintiffs or on Plaintiffs' behalf.

**RESPONSE:**

10. Produce all documents referenced or cited in your Answers to Intervenor's First Interrogatories to Plaintiffs.

**RESPONSE:**

Respectfully submitted,

**ELLINGER BELL LLC**

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