

**RELATORS
PEOPLE NOT
POLITICIANS, Et Al.
PETITION FOR
PROHIBITION
EXHIBIT 29**

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

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

MOTION FOR SANCTIONS

Intervenor Put Missouri First requests that the Court enter an Order striking Plaintiffs' pleadings for failing to comply with this Court's Order compelling discovery. In support, Intervenor states:

1. This case is set for a one-day trial on December 8, 2025.
2. On November 13, 2025 Intervenor were granted intervention and served Interrogatories and Requests for Production on Plaintiffs the same date.
3. On November 18, 2025 the parties appeared and this court ordered Plaintiff's Discovery Responses due on November 21, 2025.
4. On November 21, 2025, Plaintiffs filed a Motion for Protective Order.
5. On November 26, 2025, Intervenor's filed a Motion to Compel.
6. On December 4, 2025, this Court denied Plaintiff's Motion for Protective Order and granted Intervenor's Motion to Compel.

7. On December 8, 2025, less than two hours before the scheduled trial in this matter, Plaintiffs purported to “supplement” their discovery responses. See Exhibits A and B, attached hereto.

8. To date, Plaintiffs have not provided a single page in relation to Intervenor ten (1) requests for production. With respect to the “signatures” that form the basis of Plaintiffs’ claims, Plaintiffs day-of-trial “supplemental response” suggests the same will be filed “later this week” and may be obtained by Intervenor at some future date.

9. Plaintiffs have not complied with this Court’s Order of December 4, 2025 by failing to produce the documents and answers pursuant to Intervenor’s discovery and pursuant to the Motion to Compel this court granted.

10. Plaintiffs’ failure to comply with this Court’s Order of December 4, 2025 and failure to timely respond to Intervenor’s discovery requests irretrievably prejudice Intervenor at trial.

11. This Court should strike the pleadings of Plaintiffs for failing to comply with this Court’s Order compelling discovery. Striking of a party’s pleadings is an appropriate remedy when that party fails to comply with an order compelling discovery. Rule 61.01(b); *Lee v. Lee*, 680 S.W.3d 501, 504 (Mo. App. W.D. 2023); *Vetter Construction Company v. Innovated Construction, LLC*, 696 S.W.3d 442, 448-449 (Mo. App. E.D. 2024); and *Zurheide-Hermann, Inc. v. London Square Development Corp.*, 504 S.W.2d 161 (Mo. 1973) (affirming default judgment as a result of striking pleadings for failure to comply with an order compelling discovery).

WHEREFORE, Intervenor requests the Court enter an Order striking Plaintiffs’ pleadings as a sanction for failing to comply with this Court’s order compelling discovery.

Respectfully submitted,

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Attorneys for Intervenors

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via the Court's electronic filing system and by hand on December 8, 2025 on counsel for all parties of record.

/s/ Marc H. Ellinger