

**IN THE MISSOURI COURT OF APPEALS
WESTERN DISTRICT**

State of Missouri ex rel. PEOPLE NOT
POLITICIANS., *et al.*,

Relators,

v.

No. _____

HON. CHRISTOPHER K. LIMBAUGH,
Judge of the Circuit Court
of Cole County, Missouri,

Respondent.

PETITION FOR A WRIT OF PROHIBITION

The underlying matter here involves a claim by a proponent of a referendum that Secretary of State Hoskins improperly rejected their referendum sample sheets as to form. On the day the matter was set for trial (already delayed from an earlier trial date because of illness), Put Missouri First, a political action committee opposed to the referendum that had not been created when the suit was filed, was granted intervention over the Plaintiffs' objections. Intervenor then requested a continuance in order to seek extensive, invasive, and irrelevant discovery. When the continuance was denied, Intervenor filed an application to change judge, postponing the trial in this time-sensitive election case. Given the untimely request to intervene, the clear prejudice to the Plaintiffs from intervention, and the absence of any legitimate interest that would be affected by the case, it was a gross

abuse of discretion for Respondent Limbaugh to permit Put Missouri First to participate as intervenor.¹

Respondent compounded the problem by granting Intervenor's Motion to Compel responses to sweeping interrogatories and requests for production seeking, among other things, all signed referendum petition pages gathered prior to October 14, 2025, copies of signatures totaling almost 100,000, signature counts for specific referendum petition numbers, vendor contracts concerning signature gathering, and any "validity" reports in Relators' possession. *See* Ex. 9. The discovery compelled is not relevant to the narrow legal issues in this referendum case, is grossly disproportionate to the needs of the litigation, and intrudes upon protected First Amendment associational interests. *See* Ex. 17, 22. Intervenor lacks a real, legally cognizable interest that would justify the sweeping discovery it seeks, particularly when all requested signature pages will imminently become public records upon submission to the Secretary of State; and where the lawfulness of the Secretary of State's actions presents purely legal, record-based questions.

To be clear, the signature pages will become part of the public record when submitted to the Secretary of State later this week. No pre-submission discovery should be permitted. The vendor contracts and "validity" reports are wholly irrelevant to the issues in this case and infringe on core associational freedoms protected by the First Amendment. Indeed, Intervenor has offered no legitimate basis to intervene as of right, or permissively,

¹ The Honorable Daniel R. Green was the judge on the case at the time intervention was granted. Plaintiffs filed a Motion to Reconsider Intervention the same day intervention was granted. Respondent Limbaugh denied that motion.

and considering Intervenor's nakedly partisan interests, it was an abuse of discretion to permit the political action committee to intervene. Immediate writ relief is necessary to prevent irreparable harm and to preserve the orderly administration of this Court's discovery rules and constitutional protections.

Relators People Not Politicians and Richard von Glahn respectfully petition this Court for a writ of prohibition directing Respondent to vacate his orders permitting Intervenor Put Missouri First's intervention and granting Intervenor's motion to compel and to prohibit further intervention or enforcement of that discovery order.

I. Statement of Facts

1. On September 29, Relators filed a two-count amended petition challenging the Secretary of State's rejection of referendum petition sample sheets "as to form" before the Governor signed House Bill 1 (Count I), and seeking a declaration that signatures gathered before the Secretary's "as to form" approval are not per se invalid under Article III, Section 52(a) and Chapter 116 (Count II).² Ex. 2 (Plaintiff's Amended Complaint).

2. Between October 28 and 31, Relators and the Secretary of State entered into a joint stipulation of facts and exhibits, filed trial briefs, and were prepared to try the case on November 3. A copy of that Joint Stipulation (without exhibits) is attached as Exhibit 19. In the parties' joint stipulation of October 28, the parties stipulated to an estimate of the number of signatures gathered at the Attorney General's request. The presiding trial

² The initial petition was filed on September 18, 2025. See Ex. 1 (Docket) at ___. Relators filed an amended petition because the original count I (violation of the sunshine law) became moot.

judge at that time was the Hon. Daniel Green, and he notified the parties the day of trial that he was ill and unable to preside at trial. The trial was rescheduled to November 13, 2025. Ex. 1 (docket entry of Nov. 7, 2025).

3. On October 30, 2025, at 9:36 PM, Intervenor Put Missouri First filed a Statement of Committee Organization with the Missouri Ethics Commission. It identified itself as a new continuing committee (PAC). A copy of its Statement of Committee Organization is attached as Exhibit 24.

4. On the afternoon of November 12, Put Missouri First filed a verified Motion to Intervene asserting a generalized political and campaign finance interest in opposing the measure and in the timing and outcome of certification. The motion to intervene admits that Put Missouri's First's interests are "operational, political, and mission-specific: preventing the referendum from appearing on the ballot." Ex. 4 at ¶ 29. In case that was not clear, Intervenor went further: its "sole purpose is to prevent the measure from appearing on or being approved through the ballot." Ex. 4 at ¶ 43. Intervenor emphasized it would gain or lose by the judgment because certification would trigger campaign activity and expenditures and claimed the State might not fully align with Intervenor's single-minded opposition to the measure. Intervenor represented in its motion that its intervention would "not delay or impede adjudication of this case." Ex. 4 at ¶ 50.

5. On November 13, Put Missouri First brought its motion to intervene to the attention of the trial court. Having no opportunity to develop briefing in opposition to the

motion given the necessary preparations for trial, Plaintiffs orally opposed the motion to intervene.³ The trial court granted the motion over Plaintiffs' objections.

6. Relators and the Defendant Secretary of State announced on the record that they were ready to proceed with trial. See Ex. 10 Transcript of Nov. 13, 2025 hearing at 5:19-24. Intervenor immediately sought to postpone the trial so that it could conduct discovery. See Ex. 10 Transcript of Nov. 13, 2025 hearing at 5:25-6:12. When Judge Green denied that request, Intervenor immediately made an oral motion for continuance (not permitted by Missouri's rules, which require a verified motion for continuance, *see* Mo. R. Civ. P. 65.03), and presented a motion for change of judge, thereby postponing the trial of the case a second time. *Id.* at 6:13-7:9.

7. Initially, the case was reassigned to the Honorable S. Cotton Walker, who set a trial date for November 21. Defendant then exercised his right to change of judge, further postponing the trial. See Ex. 1 (Docket entries of Nov 14). Thereafter, the case was assigned to Respondent, the Hon. Christopher Limbaugh. See *Id.* Relators filed a motion for trial setting, seeking to maintain the trial date of November 21 as Cole County Local Rules suggest. A copy of the Motion for Trial Setting is attached hereto as Ex. 26

8. On November 13, the same day Intervention had been granted over Plaintiffs' objections, Plaintiffs filed a Motion to Reconsider Intervention. A copy of the Motion to Reconsider Intervention is attached as Exhibit 7. Plaintiffs filed suggestions in

³ In apparent acknowledgement that the Motion was not timely presented, Intervenor also filed a Motion to Shorten time for the hearing on the Motion to Intervene. See Ex. 1 (docket entries of Nov 12). Judge Green did not specifically take up or rule on this motion, but proceeded to consider and rule on the Motion to Intervene. *Id.* (docket entries of Nov 13).

support of their Motion to Reconsider in advance of a hearing on December 4. A copy of the Suggestions in Support of the Motion to Reconsider is attached as Exhibit 18. Neither Intervenor nor the Secretary filed suggestions in opposition. On December 4, Respondent Limbaugh denied Plaintiffs' motion for reconsideration. *See* Ex. 1 (docket entries of December 4).

9. On November 13, Intervenor served interrogatories and requests for production of documents on Plaintiffs. The interrogatories are attached as Exhibit 5. The requests for production of documents are attached as Exhibit 6.

10. On November 18, only 5 days after it had been served, Respondent ordered Plaintiffs to respond to the written discovery by Friday, November 21. *See* Ex. 1 (Docket entries of Nov. 18). Plaintiffs complied with that order and responded to the discovery, providing answers and objections to interrogatories, and responses and objections to the requests for production of documents, but did not produce the documents requested. The answers and objections to interrogatories are attached as Exhibit 8. The responses and objections to requests for production are attached as Exhibit 9.

11. On November 26, Intervenor filed a motion to compel responses to its invasive, overbroad, and irrelevant discovery. A copy of this motion is attached here as Exhibit 16.⁴ Plaintiffs opposed this motion to compel. A copy of their suggestions in

⁴ On the day responses were due, Plaintiffs also filed a Motion for Protective Order, raising many of the same issues in its objections. A copy of the Motion for Protective Order is attached as Exhibit ___. Intervenor's suggestions in opposition to the motion for Protective Order are attached as Exhibit ___. Respondent denied that motion. *See* Ex. 1 at ___ (docket entries of December 4).

opposition to the motion to compel is attached here as Exhibit 17. After a hearing, Respondent Limbaugh granted Intervenor's motion to compel. *See* Ex. 1 (docket entries of December 4).

12. Plaintiffs advised the Court and Intervenor on the date of the hearing that it could not comply with the discovery order before trial was set for December 8, 2025. *See* Transcript of December 4 hearing, attached as Exhibit 21 (at 17:1-18). Intervenor is likely to continue to postpone consideration and resolution of this case pursuant to its requests for discovery.

13. On November 24, Defendant Secretary of State moved to dismiss the action, contending that Count I is moot after approving a later, identical sample sheet and Count II is unripe because no signatures have been submitted or rejected. The Secretary contends only an enacted law signed by the Governor can be the subject of a referendum, and signatures cannot be counted if gathered before a petition sample sheet receives approval as to form. A copy of the Secretary's motion is attached as Exhibit 13. A copy of the Secretary's suggestions in support of the motion is attached as Exhibit 14. This expanded upon defenses first raised in the Secretary's Answer. A copy of the Answer is attached as Exhibit 3.

14. On November 26, Intervenor filed a motion to dismiss, raising the same defenses that the Secretary presented in his motion to dismiss. A copy of Intervenor's motion and suggestions in support is attached as Exhibit 15. Both motions have been taken under advisement by the Court. *See* Ex. 1 (docket entry of December 4). The Intervenor attached a proposed answer to its motion to intervene, but it does not appear that the

proposed answer has yet been filed. A copy of the proposed answer is attached as Exhibit 25.

15. Trial remains set for December 8, 2025 before Respondent at 1:30 PM.

16. Plaintiffs, Defendant Secretary of State, and Intervenors have agreed to a joint stipulation of facts that will be admitted into evidence to try this case. A copy of the joint stipulation of facts filed with the Court December 3 (without exhibits) is attached here as Exhibit 20.

II. Relief Sought

Relators seek a preliminary order in prohibition, followed by a permanent writ directing Respondent to (i) vacate the order permitting intervention and/or; (ii) vacate the order compelling responses and production to Intervenor's discovery, and (ii) enter protective relief barring discovery into signed referendum petition pages, identities of signatories and circulators, and internal campaign/vendor materials concerning signature collection and "validity" assessments.

A. Prohibition is proper to reverse grants of intervention

Prohibition is appropriate to address improper orders permitting parties to intervene. *See State ex rel. Country Mut. Ins. Co. v. May*, 620 S.W.3d 96, 101 (Mo. banc 2021) (Wilson J., concurring) (noting prohibition is appropriate because "Missouri rules do not allow for kibitzers in lawsuits.").

B. Prohibition is consistently employed to restrain improper discovery orders

Prohibition is consistently employed to restrain discovery orders that compel disclosure of protected or constitutionally sensitive materials because “[o]nce the...material[s] [are] produced, the damage...is both severe and irreparable. That damage cannot be repaired on appeal.” *State ex rel. Peabody Coal Co. v. Clark*, 863 S.W.2d 604, 608 (Mo. banc 1993); *see also State ex rel. Malashock v. Jamison*, 502 S.W.3d 618, 619 (Mo. banc 2016) (prohibition appropriate where party ‘has been directed to produce privileged information’); *State ex rel. Atchison, Topeka & Santa Fe Ry. Co. v. O’Malley*, 898 S.W.2d 550, 552 (Mo. banc 1995); *State ex rel. Humane Society of Mo. v. Beetem*, 317 S.W.3d 669 (Mo. Ct. App. 2010).” A writ is appropriate to prevent such harm and to confine discovery to matters that are relevant and proportional to the needs of the case under Rule 56.01;

III. Statement of Reasons Why Writ Should Issue

Intervenor seeks to use litigation to accomplish its political goals that are not appropriate or timely in this lawsuit; if Put Missouri First wants to review signatures for a possible signature challenge, it is free to do that if and when proponents of the referendum submit signatures to the Secretary of State. With Respondent granting intervention and expansive, invasive discovery, Intervenor’s improper motives were given judicial cover. That cannot stand. A writ is appropriate here to limit the damage and allow Plaintiffs to expeditiously resolve its claims. Respondent exceeded his

authority and abused his discretion by granting intervention and compelling discovery that is irrelevant and disproportionate to the needs of this litigation.

A. A writ should issue to reverse Respondent's improper order permitting intervention.

Intervenor's Verified Motion to Intervene certainly did not adequately support a right to intervention nor would permissive intervention have been appropriate.

Respondent abused his discretion in allowing Intervenor, who admits its interests are solely political, to intervene and wreak havoc on a quickly moving, politically sensitive matter.

First, Intervenor lacks a real, direct, legally protectable interest in this case. "An interest sufficient for Rule 52.12(a)(2) must be "a direct claim upon the subject matter such that intervenor will either gain or lose by direct operation of the judgment, not a consequential, remote or conjectural campaign interest." *Allred v. Carnahan*, 372 S.W.3d 477, 484-84 (Mo. App. 2012). Intervenor's asserted interests (timing of campaign expenditures, political opposition, and messaging) are not legal interests in the outcome of whether the Secretary exceeded his statutory authority regarding the disapproval "as to form" of the referendum petition sample sheet or whether Section 52(a) permits pre-approval signature gathering. That is not to say these are inconsequential issues. They are just not consequential for Intervenor.

"An interest necessary for intervention as a matter of right does not include a mere, consequential, remote or conjectural possibility of being affected as a result of the action, but must be a direct claim upon the subject matter such that the intervenor will

either gain or lose by direct operation of judgment.” *State ex rel Nixon v. American Tobacco Co., Inc.*, 34 S.W.3d 122, 128 (Mo. banc 2000)(cleaned up). Intervenor’s interest is consequential, remote, and conjectural, and the outcome of this litigation will not change *anything* for Intervenor.

Intervenor says that its interest is “preventing the referendum from appearing on the ballot[.]” Ex. 4 (Mot. to Intervene ¶ 29). But the outcome of this case will not place or prevent the referendum from appearing on the ballot — this lawsuit is only about approval as to form of referendum petition sample sheets and the start date for signature collection. No matter how Respondent rules regarding the Secretary’s obligations to approve a sample referendum petition sample sheet as to form (and the validity of signatures collected on an admittedly valid form prior to receipt of the Secretary’s blessing), it is not going to prevent the referendum from appearing on the ballot or guarantee that it appears on the ballot. Rather, the lawsuit is about intermediate steps—the form of the referendum petition and timing of signature collection. *See gen.* Ex. 2. Intervenor will still have to prepare for a campaign, no matter the outcome here. A court’s role “is not to act as a political arbiter between opposing viewpoints in the initiative process.” *Missourians Against Human Cloning v. Carnahan*, 190 S.W.3d 451, 456 (Mo. App. W.D.2006).

Intervenor seems to admit as much. Intervenor’s own motion describes political and operational interests— timing of expenditures, messaging, and opposition strategy. Ex. 4 (Mot. to Intervene ¶ 29). These do not create a real interest in the adjudication of

Plaintiffs' claims. Rather, they demonstrate an interest in short-circuiting the normal campaign process by using the courts to do Intervenor's political work.

Second, Intervenor's interests are adequately represented by Defendant Secretary of State. Intervenor claims that its interests are not adequately represented, but this is squarely foreclosed by Supreme Court precedent: "The provision allowing intervention when an applicant's claim or defense and the main action have a question of law or fact in common is inapplicable to Defendant-Intervenor[s] because [it] merely reasserted the State's defenses." *Committee for Educational Equality v. State*, 294 S.W.3d 477, 487 (Mo. banc 2009).

The issue here is simply whether the Secretary could reject sample sheets "as to form" at the initial stage of the signature gathering process and whether signatures may be gathered prior to approval of that sample sheet. The Secretary's interest in that issue is identical to Put Missouri First's. Put Missouri First asserts the same defenses as the Secretary of State – failure to state a claim, no standing, ripeness, and justiciability. As in *Committee for Educational Equality*, "Defendant-Intervenor[]" asserted no claim, defense, or interest unique to [itself]." *Id.* Thus, Rule 52.12(b) "provided no mechanism by which [Put Missouri First] could join the State's defense [.]'" *Id.*

Aside from asserting the same defenses, Intervenor does not have different motives than the Secretary of State. The Secretary is engaged in federal litigation attempting to prevent Plaintiffs (in that case, named as defendants) from turning in signatures seeking a referendum in the first place. *See Missouri General Assembly, et al., v. Richard von Glahn, et al.*, Case No. 4:25-cv-01535-ZMB. If Intervenor is taken at its word that its "sole

purpose” is to keep Plaintiffs’ referendum from making it to the ballot, the Secretary of State (based on his actions) has that same interest and is doggedly pursuing it.

B. A writ should issue to overturn Respondent’s order compelling extensive, invasive discovery

Intervenor’s discovery is not grounded in the discovery rules, but instead is a fishing expedition intended for Intervenor to gain a political advantage. Respondent exceeded his authority in issuing a vague order granting Intervenor’s expansive, invasive discovery.

Discovery must be limited to non-privileged matters “relevant to a claim or defense” and “proportional to the needs of the case.” Rule 56.01(b)(1). Orders compelling irrelevant or disproportionate discovery are an abuse of discretion warranting writ relief. *Concerned Citizens for Crystal City v. City of Crystal City*, 334 S.W.3d 519, 524 (Mo. App. 2010).

Given Intervenor’s lack of a proper interest to intervene in the first place, it certainly does not have an adequate interest that would support intrusive factual discovery (which does not meet the basic requirements of Rule 56.01) into a political committee’s core petitioning activity where the underlying claims are purely legal challenges to the Secretary’s authority and timing under Article III, Section 52(a) and Chapter 116.

The Secretary’s defenses—and the issues framed by the parties’ pretrial briefs—concern justiciability and questions of law (mootness, ripeness, the meaning of “law” and approval “as to form”), not the granular identity or volume of unfiled signatures or the mechanics of signature collection. Discovery into signers’ identities, raw petition pages, and internal validity assessments is irrelevant to any live claim and cannot be justified as reasonably calculated to lead to the discovery of admissible evidence on purely legal

questions. *See Friends of the San Luis, Inc. v. Archdiocese of St. Louis*, 312 S.W.3d 476, 483 (Mo. App. E.D. 2010); *Jackson Cnty. Bd. of Election Comm'rs ex rel. Brown v. City of Lee's Summit*, 277 S.W.3d 740, 745 (Mo. App. W.D. 2008)).

Intervenor's theory that these materials are necessary is therefore wrong; they are simply irrelevant to the claims and defenses. *See State ex rel. Humane Society of Missouri v. Beetem*, 317 S.W.3d 669 (Mo. App. 2010) (granting writ of prohibition to prohibit irrelevant discovery in initiative petition case). In fact, Intervenor undermines its own theory of discovery by also asserting a Motion to Dismiss arguing that Plaintiffs' claims are not ripe. *See Ex. 15* (Intervenor's Motion to Dismiss).

Intervenor's requests are also not relevant or proportional under Rule 56.01. The requests seek a wholesale production of tens of thousands of unfiled petition pages containing voters' names and addresses; "counts" for stipulated petition numbers; and internal vendor contracts and "validity" assessments. None of this bears on whether the Secretary could reject a sample sheet as to form because the Governor had not signed a bill, or whether the Constitution and statutes require approval as to form before signatures may be gathered. And Plaintiffs have a right to see their forms approved whether they have yet gathered any signatures—or if they ever do. *See ACLU v. Ashcroft*, 577 S.W.3d 881 (Mo. 2019)(discussing that the Secretary must approve referendum sample sheets and when); *No Bans on Choice v. Ashcroft*, 638 S.W.3d 484 (Mo. banc 2022)(entering declaratory judgment even though the proponents failed to meet the required number of signatures).

Even if marginal relevance were hypothesized, this discovery is grossly disproportionate given its scope, sensitivity, and the availability of alternative sources and later-stage processes if signatures are ever submitted for verification. *See Concerned Citizens for Crystal City*, 334 S.W.3d at 524. Courts confine discovery to matters “relevant to the subject matter involved in the pending action,” and nothing in Intervenor’s pleadings or in the State’s defenses renders the identities of signers, the number of unfiled signatures, or internal vendor contracts relevant to the adjudication of these legal questions. *See* Rule 56.01(b)(1); *Concerned Citizens for Crystal City*, 334 S.W.3d at 524. Allowing an intervenor to leverage party discovery to obtain sensitive, nonpublic associational information during the circulation phase would distort both Rule 56.01 and the constitutional structure governing referenda.

Whether any particular registered voter has signed the referendum is irrelevant to the issues here. There will be a time and a place for a signature challenge, if Intervenor (or someone else) chooses to mount one. At that point, signatures would have been submitted to the Secretary and made public records. The Intervenor is then free to obtain the *submitted* pages and challenge signatures, if the Secretary certifies Plaintiffs’ referendum petition. Indeed, the statutes permit “any citizen” to challenge the Secretary’s decision regarding certification. *See* § 116.200, RSMo. Intervenor has simply been permitted to participate in the wrong lawsuit.

Respondent also ignored the vital First Amendment considerations at stake in the Intervenor’s discovery requests. Compelling disclosure of signatory and circulator identities and internal campaign operations contravenes the First Amendment’s protection

of political association and petitioning activity, and will irreparably chill participation, particularly here where the Intervenor appears to be requesting signature pages that have not been turned in. It may be that the proponents choose not to turn in some of the signature pages, and that is their right.

Exacting scrutiny applies to compelled disclosure regimes that threaten associational privacy, particularly where sweeping disclosure is demanded absent a particularized need tethered to an actual, live merits issue. *See NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 461–62 (1958); *Americans for Prosperity Found. v. Bonta*, 594 U.S. 595, 607–08 (2021); *Peters v. Johns*, 489 S.W.3d 262, 271 (Mo. banc 2016) (citing *Buckley v. Am. Constitutional Law Found.*, 525 U.S. 182 (1999)). Intervenor’s demands fall squarely within what courts protect from compelled disclosure, and Respondent’s order therefore exceeds the permissive bounds of discovery.

Compelled disclosure of supporter and circulator identities burdens associational rights and triggers exacting scrutiny, requiring a substantial relation to an important interest and narrow tailoring. *Id.* Intervenor’s argument that petition pages are public facing documents is inapposite. Yes, it may be the case that one day, *some* petition pages will be public documents (as discussed above). But, Intervenor, a self-declared political opponent, seeks Plaintiffs’ unfiled, mid-campaign lists of supporters and circulators. Ancillary to this litigation is a public campaign aimed to undermine Plaintiffs’ signature collection and campaign effort. Placing thousands of names of supporters in the hands of a political opponent will serve no legitimate discover purpose and only make it easier for the

campaign to harass campaign supporters and volunteers. *See* Motion for Protective Order, attached as Ex. 22.

Intervenor's briefing reveals its requests are designed to test, preemptively, the factual sufficiency of unfiled and unverified signatures to advance Intervenor's political objective of opposing the referendum, including sweeping demands for all petition pages gathered before October 14 and for "approximately 32,600" and "approximately 70,200" signatures referenced in stipulations (which are no longer at issue). Those theories are collateral to the legal questions before the court and are properly addressed, if ever, within the statutory verification process after submission—not through party discovery at the behest of a political opponent. As the Court of Appeals concluded in issuing a writ to prohibit discovery, "[t]he motives and political strategies of initiative proponents are not relevant to the court's analysis" of the Secretary of State's duties. *State ex rel. Humane Society of Mo.*, 317 S.W.3d at 673.

WHEREFORE, for the reasons set forth above and in the suggestions in support of this Petition contemporaneously filed herewith, Relators request the Court:

1. Issue its preliminary writ of prohibition directing Respondent to show cause why the intervention and discovery order should not be vacated;
2. Upon submission, make the writ permanent and direct Respondent to vacate the order granting permission to intervene and Intervenor's motion to compel;
3. Direct Respondent to enter protective relief under Rule 56.01(c) prohibiting discovery into signed referendum petition pages, identities of signatories and circulators,

and internal campaign/vendor materials concerning signature gathering and any internal “validity” assessments; and

4. Grant such other and further relief as is just and proper.

Respectfully Submitted,

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