

**IN THE CIRCUIT COURT OF COLE COUNTY  
STATE OF MISSOURI**

PEOPLE NOT POLITICIANS and  
RICHARD VON GLAHN,

Plaintiffs,

vs.

DENNY HOSKINS, MISSOURI  
SECRETARY OF STATE,

Defendant.

Case No: 25AC-CC08724

**JOINT STIPULATION ON DISCOVERY AND EVIDENCE PRESENTED  
AT TRIAL**

The Parties agree that this Joint Stipulation (1) describes discovery propounded in this matter and responses to such discovery and (2) governs the presentation and submission of evidence at trial.

**DISCOVERY**

1. Plaintiffs People Not Politicians and Richard von Glahn served requests for production and interrogatories on Defendant Denny Hoskins on November 21, 2025.

2. Secretary Hoskins provided timely responses and objections to Plaintiffs' 23 requests for production.

3. Secretary Hoskins' responses and objections to Plaintiffs' requests for production are attached hereto as **Exhibit A.**

4. Secretary Hoskins provided timely responses and objections to Plaintiffs' 18 interrogatories.

5. Secretary Hoskins' responses and objections to Plaintiffs' interrogatories are attached hereto as **Exhibit B.**

### **EVIDENCE**

1. The Secretary of State provided the following documents in discovery:

- i. Certified copy of the ballot title for House Bill 1, attached hereto as **Exhibit C.**
- ii. Congressional District Map of Truly Agreed and Finally Passed HCS HB 2909, attached hereto as **Exhibit D.**
- iii. House Bill 1, attached hereto as **Exhibit E.**
- iv. Map of Congressional Districts in House Bill 1, attached hereto as **Exhibit F**
- v. Official ballot titles for 2018-R002, 2020-R001, and 2022-R002, attached hereto as **Exhibit G.**

2. The Secretary stated, in verified interrogatory responses, that the 2022 Congressional map and plan and House Bill 1 and the map formed by House Bill 1 support the language of the summary statement.

3. The Secretary agrees that, at trial, he will not introduce or rely on any evidence except for Exhibits C-G attached herein and any evidence introduced or referenced by Plaintiffs in their case in chief.

4. The Secretary stipulates and agrees that, at trial, he will not call any witnesses, including any expert witnesses, to provide testimony. However, the

Secretary reserves the right to cross examine any witnesses called by Plaintiffs, including expert witnesses.

5. The Secretary further stipulates and agrees that, if Plaintiffs introduce evidence or call witnesses, including any expert witnesses, the Secretary will not introduce or rely on any rebuttal evidence or testimony, except for Exhibits C-G attached herein. The Secretary will, however, have the chance to cross-examine any witnesses, including expert witnesses, called by Plaintiffs. And the Secretary may utilize any evidence presented by Plaintiffs.

6. The Parties do not concede that any facts or exhibits admitted into the record, including the exhibits attached herein, are relevant or necessary for the Court to resolve this matter.

7. The Parties further stipulate and agree that they reserve objections to relevance of any and all evidence or witness testimony presented in this matter.

Respectfully submitted

**STINSON LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of January, 2026, I electronically filed the foregoing with the Clerk of the Court via the Court's electronic filing system, which sent notification to all counsel of record.

/s/ Alixandra S. Cossette

Attorney for Plaintiffs