

**From:** [Hatfield, Charles](#)  
**To:** [Lansdell, Madeline](#)  
**Cc:** [Cossette, Alixandra S.](#); [Barrett, Alexander C.](#); [Hunker, Kathleen](#)  
**Subject:** RE: PNP v. Hoskins No. 25AC-CC08724 - Proposed Order  
**Date:** Friday, January 16, 2026 9:08:43 AM

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My clients do not want to enter into stipulations about the unfairness of the title without a record supporting what is unfair about it.

Given that, and the outstanding count II, we want to proceed to trial. Alix is working on some partial stipulations for your consideration (stipulating to the documents, etc...) that could make it go faster.

Happy to discuss if needed, but they want to go to trial.

**Charles W. Hatfield**

Partner

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**From:** Lansdell, Madeline <[Madeline.Lansdell@ago.mo.gov](mailto:Madeline.Lansdell@ago.mo.gov)>

**Sent:** Monday, January 12, 2026 8:14 PM

**To:** Hatfield, Charles <[chuck.hatfield@stinson.com](mailto:chuck.hatfield@stinson.com)>

**Cc:** Cossette, Alixandra S. <[alix.cossette@stinson.com](mailto:alix.cossette@stinson.com)>; Barrett, Alexander C. <[alexander.barrett@stinson.com](mailto:alexander.barrett@stinson.com)>; Hunker, Kathleen <[Kathleen.Hunker@ago.mo.gov](mailto:Kathleen.Hunker@ago.mo.gov)>

**Subject:** RE: PNP v. Hoskins No. 25AC-CC08724 - Proposed Order

Hi Chuck,

Following up on the proposed order we sent over on Friday. We are happy to continue discussions as necessary.

Thank you,  
Madeline

**Madeline Lansdell** | Assistant Solicitor General  
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**From:** Hatfield, Charles <[chuck.hatfield@stinson.com](mailto:chuck.hatfield@stinson.com)>

**Sent:** Friday, January 9, 2026 10:36 AM

**To:** Lansdell, Madeline <[Madeline.Lansdell@ago.mo.gov](mailto:Madeline.Lansdell@ago.mo.gov)>

**Cc:** Cossette, Alixandra S. <[alix.cossette@stinson.com](mailto:alix.cossette@stinson.com)>; Barrett, Alexander C.

<[alexander.barrett@stinson.com](mailto:alexander.barrett@stinson.com)>; Hunker, Kathleen <[Kathleen.Hunker@ago.mo.gov](mailto:Kathleen.Hunker@ago.mo.gov)>

**Subject:** RE: PNP v. Hoskins No. 25AC-CC08724 - Proposed Order

Thanks much. We will take a look. Given that the trial moved, it might be Monday until we can get back to you.

**Charles W. Hatfield**

Partner

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**From:** Lansdell, Madeline <[Madeline.Lansdell@ago.mo.gov](mailto:Madeline.Lansdell@ago.mo.gov)>

**Sent:** Friday, January 9, 2026 10:26 AM

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**Cc:** Cossette, Alixandra S. <[alix.cossette@stinson.com](mailto:alix.cossette@stinson.com)>; Barrett, Alexander C.

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**Subject:** RE: PNP v. Hoskins No. 25AC-CC08724 - Proposed Order

**External Email – Use Caution**

Chuck,

Attached, please find our edits to the proposed order. I have provided a copy with tracked changes reflecting our edits and a clean copy.

Thank you,  
Madeline

**Madeline Lansdell** | Assistant Solicitor General

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**From:** Hatfield, Charles <[chuck.hatfield@stinson.com](mailto:chuck.hatfield@stinson.com)>

**Sent:** Friday, January 9, 2026 8:54 AM

**To:** Lansdell, Madeline <[Madeline.Lansdell@ago.mo.gov](mailto:Madeline.Lansdell@ago.mo.gov)>; Hunker, Kathleen

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**Cc:** Cossette, Alixandra S. <[alix.cossette@stinson.com](mailto:alix.cossette@stinson.com)>; Barrett, Alexander C.

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**Subject:** PNP v. Hoskins No. 25AC-CC08724 - Proposed Order (002)

Please see attached proposed order. In the interests of speed, this is not redlined against your old order but is submitted to you "clean."

In order for the Court to enter an order that the Secretary rewrite, we are going to have a record to support the entry of such an order.

After reviewing the Secretary's Answer to Plaintiffs' Petition, we do not have that yet. So this order recites that the Secretary Stipulates to the factual predicates needed for entry of the order. It also contains the statutorily-required finding from the Court that the summary statement is insufficient and unfair.

We may have to just discuss this with the Court and see how he wants to handle it.

**Charles W. Hatfield**

Partner

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