

Stipulated Exhibit 22

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.

MOTION TO EXPEDITE CONSIDERATION OF WRIT OF PROHIBITION

Pursuant to Rule 84.01, Relators respectfully move this Court for an order expediting consideration of this writ of prohibition. In support of this Motion, Relators state:

1. The core issue in the underlying case is whether the Secretary of State can deem nearly 100,000 signatures gathered in support of a referendum petition invalid—and refuse to send them to local election authorities for further processing—based on the date those signatures were gathered.

2. As explained in the Petition and Suggestions in Support, local election authorities' signature validation efforts are currently underway, but the Secretary has refused to transmit nearly a third of the signatures gathered in support of a referendum to the local election authorities for processing.

3. As also explained in the Petition and Suggestions in Support, this is a time-sensitive election case that will impact the 2026 election. If Respondent does not rule

promptly, there is significant risk of chaos in August, when the Secretary has indicated he plans to make a decision on the sufficiency or insufficiency of the referendum petition.

There is significant risk of this case running into the statutory deadline for altering ballots and creating the problems the Supreme Court warned against in *Coleman v. Ashcroft*, 696 S.W.3d 347 (Mo. banc 2024).

4. This case was tried to Respondent on December 8, 2025. The record is closed and all facts necessary to resolve this case and ensure local election authorities have time to perform their work are before Respondent.

5. Relators asked Respondent at status conferences in January, February, and March to render a final, appealable judgment so that—if necessary—Relators can seek appellate review and obtain meaningful relief.

6. To date, Respondent still has not issued a judgment or ruled on Relators' March 6, 2026 Motion to End Abeyance and Render Judgment.

7. Relators respectfully request the Court to expedite consideration of this writ to protect the rights that have been placed at risk by Respondent's failure to fully and finally adjudicate this case.

For the reasons set forth above, Relators request this Court expedite consideration of Relators' Petition.

Respectfully Submitted,

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