

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

RICHARD VON GLAHN,

Plaintiff,

v.

Case No. 26AC-CC00440

DENNY HOSKINS, in his official
capacity,

Defendant.

JOINT STIPULATION OF FACTS AND EXHIBITS

The Parties stipulate to the admission of the following facts and exhibits. By stipulating to these facts and exhibits, the Parties do not concede that such facts and exhibits are relevant or necessary for the Court to resolve this matter. The Parties have agreed not to object to the entry of these facts and exhibits into the record, reserving objections to relevance only. Matters contained in exhibits but not expressly discussed in a stipulation are part of the record and may be cited by the Parties.

1. Plaintiff Richard von Glahn is a Missouri citizen, resident of St. Louis County, a taxpayer, and qualified voter in the State of Missouri.

2. Defendant Denny Hoskins is the Secretary of State for the State of Missouri.

3. Intervenor Republican National Committee is the national committee of the Republican Party as defined by 52 U.S.C. § 30101.

4. Intervenor National Republican Congressional Committee is the national congressional committee of the Republican Party as defined by 52 U.S.C. § 30101(14).

5. Intervenor Missouri Republican State Committee is the duly established state committee for the Missouri Republican Party under Section 115.603, RSMo., and has been selected and serves in the role of representing and acting for the Missouri Republican Party in the interim between party conventions under Section 115.605, RSMo.

6. Attached as **Stipulated Exhibit 1** is a true and correct copy of Referendum Petition 2026-R004.

7. Attached as **Stipulated Exhibit 2** is a true and correct copy of the October 14, 2025 letter approving Referendum Petition 2026-R004 as to form.

8. Attached as **Stipulated Exhibit 3** is a true and correct copy of the signature pages submitted to the local election authorities for Referendum Petition 2026-R004.

9. Attached as **Stipulated Exhibit 4** is a true and correct copy of Report PM-007 dated August 6, 2026 for Referendum Petition 2026-007.

10. Attached as **Stipulated Exhibit 5** is a true and correct copy of the Certificate of Insufficiency for Referendum Petition 2026-R004.

11. Attached as **Stipulated Exhibit 6** is a true and correct copy of the Complaint filed in *Missouri General Assembly, et al., v. von Glahn, et al.*, Case No. 4:25-cv-01535.

12. Attached as **Stipulated Exhibit 7** is a true and correct copy of the Motion for Preliminary Injunction filed in *Missouri General Assembly, et al., v. von Glahn, et al.*, Case No. 4:25-cv-01535.

13. Attached as **Stipulated Exhibit 8** is a true and correct copy of the Memorandum and Order (Dec. 8, 2025) issued in *Missouri General Assembly, et al., v. von Glahn, et al.*, Case No. 4:25-cv-01535.

14. Attached as **Stipulated Exhibit 9** is a true and correct copy of the State of Missouri's Motion to Alter the Judgment and Memorandum in Support filed in *Missouri General Assembly, et al., v. von Glahn, et al.*, Case No. 4:25-cv-01535.

15. Attached as **Stipulated Exhibit 10** is a true and correct copy of the Memorandum and Order (May 11, 2026) issued in *Missouri General Assembly, et al., v. von Glahn, et al.*, Case No. 4:25-cv-01535.

16. Attached as **Stipulated Exhibit 11** is a true and correct copy of Make Your Voice Heard: Missouri's Initiative Petition Process.

17. Attached as **Stipulated Exhibit 12** is a true and correct copy of an October 15, 2025 press release from the Secretary of State.

18. Attached as **Stipulated Exhibit 13** is a true and correct copy of an October 16, 2025 press release from the Secretary of State.

19. Attached as **Stipulated Exhibit 14** is a true and correct copy of an October 28, 2025 St. Louis Public Radio article titled "Missouri Republicans learn that redrawing congressional lines isn't so easy" by Jason Rosenbaum.

20. Attached as **Stipulated Exhibit 15** is a true and correct copy of a May 18, 2026 St. Louis Public Radio article titled “Group asks judge to force Missouri secretary of state to decide redistricting referendum” by Jason Rosenbaum.

21. Attached as **Stipulated Exhibit 16** is a true and correct copy of a January 8, 2026 Kansas City Star article titled “Is Missouri GOP dragging out redistricting cases? ‘Delay works in our favor’” by Kacen Bayless.

22. Attached as **Stipulated Exhibit 17** is a true and correct copy of the 1922 election results for Proposition 17.

23. Attached as **Stipulated Exhibit 18** are true and correct copies of newspaper articles regarding the 1922 election on Proposition 17.

24. Attached as **Stipulated Exhibit 19** are true and correct copies of newspaper articles regarding the attempted 1952 referendum election on congressional redistricting.

25. Attached as **Stipulated Exhibit 20** is a true and correct copy of House Bill 2909 (2022).

26. Attached as **Stipulated Exhibit 21** is a true and correct copy of the affidavit of Brianna Lennon, executed August 13, 2026.

27. Attached as **Stipulated Exhibit 22** is a true and correct copy of People Not Politicians’ and Richard von Glahn’s Motion to Expedite filed on April 1, 2026, in *State ex rel. People Not Politicians, et al., v. Limbaugh*, No.

WD88821.

28. Attached as **Stipulated Exhibit 23** is a true and correct copy of People Not Politicians' and Richard von Glahn's Suggestions in Support of Petition for a Writ of Prohibition filed on April 1, 2026, in *State ex rel. People Not Politicians, et al., v. Limbaugh*, No. WD88821.

29. Attached as **Stipulated Exhibit 24** is a true and correct copy of Appellants' Motion to Expedite filed on December 31, 2025, in *Luther v. Hoskins*, No. SC101412.

30. Attached as **Stipulated Exhibit 25** is a true and correct copy of Plaintiffs' Suggestions in Opposition to a Continuance filed on December 15, 2025, in *Wise v. State*, No. 2516-CV29597, and in *Healey v. State*, No. 2516-CV31273.

31. Attached as **Stipulated Exhibit 26** is a true and correct copy of Plaintiffs' Suggestions in Support of a Preliminary Injunction filed on January 14, 2026, in *Maggard v. State*, No. 25AC-CC09120.

32. Attached as **Stipulated Exhibit 27** is a true and correct copy of Respondent's Brief filed on February 9, 2026, in *Luther v. Hoskins*, No. SC101412.

33. Attached as **Stipulated Exhibit 28** is a true and correct copy of the affidavit of Tammy Brown, executed August 13, 2026.

34. Attached as **Stipulated Exhibit 29** is a true and correct copy of the Amicus Brief of Brianna Lennon filed on April 10, 2026, in *Maggard v. State*, No. SC101581.

35. Attached as **Stipulated Exhibit 30** is a true and correct copy of the Amicus Brief of Kurt Bahr et al. filed on April 28, 2026, in *Maggard v. State*, No. SC101581.

36. Attached as **Stipulated Exhibit 31** is a true and correct copy of the transcript of the third day of trial, February 19, 2026, in *Wise v. State*, No. 2516-CV29597, and in *Healey v. State*, No. 2516-CV31273.

37. Attached as **Stipulated Exhibit 32** is a true and correct copy of a September 15, 2025 article by Mathew Pilger in the *Missouri Independent* titled “Missouri’s New Congressional Map Could Complicate Midterm Voting Clerks Warn.” Within **Stipulated Exhibit 32** is a true, correct, and complete transcription of an August 27, 2025 letter sent by Sherry Parks on behalf of the Missouri Association of County Clerks and Election Authorities to Jonathan Patterson, Speaker of the Missouri House of Representatives.

38. Attached as **Stipulated Exhibit 33** is a true and correct copy of an August 4, 2026 article by Jen Rice and Yunion Rivas in *Democracy Docket* titled “Missouri blocks anti-gerrymander referendum from November ballot in attempt to silence voters.”

39. Attached as **Stipulated Exhibit 34** is a true and correct copy of a March 27, 2026 article by Jen Rice in *Democracy Docket* titled “GOP derails bid to stop Missouri gerrymander for 2026.”

40. Attached as **Stipulated Exhibit 35** is a true and correct copy of the affidavit of Mike Ambrosini, executed August 13, 2026.

41. Attached as **Stipulated Exhibit 36** is a true and correct copy of the affidavit of Miles Ross, executed August 14, 2026.

42. Attached as **Stipulated Exhibit 37** is a true and correct copy of Merrill Weber executed August 17, 2026.

Respectfully submitted,

CATHERINE L. HANAWAY STINSON LLP

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2026, I electronically filed the foregoing Plaintiff's Suggestions in Opposition to Motion to Intervene with the Clerk of Court using the Court's e-filing system.

/s/ Alixandra S. Cossette
Attorney for Plaintiff