

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

TERRENCE WISE, *et al.*,

Plaintiffs,

v.

Case No. 2516-CV29597

STATE OF MISSOURI, *et al.*,

Defendants.

**STATE DEFENDANTS' LIST OF CASES SHOWING ALL PREVIOUS
STATEWIDE REDISTRICTING CHALLENGES HAVE BEEN BROUGHT IN
COLE COUNTY**

The Court convened a hearing on November 24, 2025, on the State Defendants' motion to dismiss for lack of subject matter jurisdiction or in the alternative for improper venue. In the course of the proceeding, the State noted that all challenges to statewide redistricting plans which the State's research unveiled were filed in Cole County. In response, the Court requested for each of the parties to submit a list of cases which brought a redistricting challenge to a statewide plan.

Per the Court's request, below is the State's list of all redistricting actions of which the State is aware. The State has organized the cases by (1) challenges to a statewide plan brought in Cole County, (2) original actions related to a statewide plan filed in the Missouri Supreme Court, (3) challenges to a local redistricting plan under previous constitutional provisions, (4) challenges to special contests after

redistricting but before the general election with the new map, and (5) challenges to candidate residency requirements after redistricting.

From its research, the State is not aware of any actions challenging the legality of a statewide plan filed outside of Cole County. The only cases filed in other jurisdictions involve either local redistricting or collateral issues arising after redistricting was complete. This history shows that Cole County is the proper venue for the above-captioned action, as well as any challenge to a state-wide map.

1. Challenges to a statewide plan brought in Cole County:

- *Luther v. Hoskins*, 25AC-CC06964 (Cir. Ct. Cole Cnty. filed Sept. 12, 2025) (challenge to congressional redistricting brought in Cole County).
- *Faatz v. Ashcroft*, 685 S.W.3d 388 (Mo. banc 2024) (challenge to state senate redistricting brought in Cole County).
- *Pearson v. Koster*, 367 S.W.3d 36 (Mo. banc 2012) (per curiam) and *Pearson v. Koster*, 359 S.W.3d 35 (Mo. banc 2012) (per curiam) (appeals from consolidated challenge to congressional redistricting where both cases were brought in Cole County).
- *Johnson v. State*, 366 S.W.3d 11 (Mo. banc 2012) (challenge to state house redistricting brought in Cole County).
- *Preisler v. Kirkpatrick*, 528 S.W.2d 422 (Mo. banc 1975) (challenge to existing state senate districts brought in Cole County).
- *Preisler v. Hearn*, 362 S.W.2d 552 (Mo. banc 1962) (challenge to congressional redistricting brought in Cole County).

2. Original actions related to a statewide plan filed in the Missouri Supreme Court:

- *State ex rel. Teichman v. Carnahan*, 357 S.W.3d 601 (Mo. banc 2012) (per curiam) (writ of prohibition and mandamus against Secretary of State challenging to state senate redistricting).
- *State ex rel. Carroll v. Becker*, 45 S.W.2d 533 (Mo. banc 1932) (mandamus action against Secretary of State to receive and file a declaration of candidacy even though Governor had not yet signed redistricting bill).

- *State ex rel. Gordon v. Becker*, 49 S.W.2d 146 (Mo. banc 1932) (original proceeding in mandamus to compel Secretary of State to receive and file a declaration of candidacy for state senate).

- *State ex rel. Lashly v. Becker*, 235 S.W. 1017 (Mo. banc 1921) (original proceeding in mandamus challenging state senate districts).

3. Challenges to a local redistricting plan under previous constitutional provisions:

- *Preisler v. Doherty*, 284 S.W.2d 427 (Mo. banc 1955) (challenge to state senate districts apportioned by St. Louis Board of Election Commissioners brought in St. Louis).
- *State ex rel. McNary v. Mooney*, 247 S.W.2d 726 (Mo. banc 1952) (original proceeding in writ of prohibition challenging state representative districts apportioned by St. Louis Board of Election Commissioners).
- *State ex rel. Davis v. Ramacciotti*, 193 S.W.2d 617 (Mo. banc 1946) (original writ of prohibition challenging state representative districts in St. Louis County).
- *State ex rel. Barrett v. Hitchcock*, 146 S.W. 40 (Mo. banc 1912) (per curiam) (mandamus action seeking to compel St. Louis Circuit Court judges to apportion county into state senate districts).

4. Challenges to special contests after redistricting but before the general election with the new map:

- *State ex rel. Mathewson v. Board of Election Commissioners of St. Louis County*, 841 S.W.2d 633 (Mo. banc 1992) (challenge to use of new state senate district in special election to fill a vacancy that a resignation created brought in St. Louis County).
- *State ex rel. Holland v. Moran*, 865 S.W.2d 827 (Mo. App. W.D. 1993) (challenge involving the use of new state senate districts in party's nomination contest to fill a vacancy that a resignation created).

5. Challenges to candidate residency requirements after redistricting:

- *Gray v. Taylor*, 368 S.W.3d 154 (Mo. banc 2012) (per curiam) (challenge regarding whether a candidate satisfied Article III, Section 4's residency requirements for state representative after state redistricted brought in St. Louis County).

- *Wright-Jones v. Nasheed*, 368 S.W.3d 157 (Mo. banc 2012) (per curiam) (challenge regarding whether a candidate satisfied Article III, Section 6's residency requirements for state representative after state redistricted brought in St. Louis County).

Dated: November 26, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on November 26, 2025, the foregoing was filed on the Missouri CaseNet e-filing system, which will send notice to all counsel of record.

/s/ Graham D. Miller

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