

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

TERRENCE WISE, et al.,

Plaintiffs,

v.

STATE OF MISSOURI, et al.,

Defendants.

Case No. 2516-CV29597 (LEAD CASE)

Division 15

ELIZABETH HEALEY, et al.,

Plaintiffs,

v.

STATE OF MISSOURI, et al.,

Defendants.

Case No. 2516-CV31273

Division 15

**ANSWER AND AFFIRMATIVE DEFENSES OF STATE DEFENDANTS TO
WISE PLAINTIFFS' PETITION FOR DECLARATORY JUDGMENT AND
INJUNCTIVE RELIEF**

Defendants, the State of Missouri and Missouri Secretary of State Denny Hoskins, in his official capacity, (collectively, "State Defendants") respectfully file their Answer and Affirmative Defenses to the Wise Petition for Declaratory Judgment and Injunctive Relief.

ANSWER

Pursuant to Section 509.260, RSMo, State Defendants deny each and every allegation in Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief

except for those expressly admitted here; this includes any allegation made in any header, footnote, or non-numbered paragraph of the petition. The headings and paragraphs below correlate to the sections and numbered paragraphs of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief. Titles that are reproduced in this answer are included for organizational purposes only, and State Defendants do not admit any matter contained in reproduced titles. State Defendants deny that Plaintiffs have alleged any lawful claim against them.

For further response, State Defendants answer as follows:

INTRODUCTION

1. State Defendants admit that Governor Kehoe issued a proclamation to convene an extraordinary session of the Missouri General Assembly. State Defendants further admit that the proclamation identified congressional redistricting as one of the reason for calling the extraordinary session. State Defendants deny all other allegations in Paragraph 1.

2. State Defendants admit that the General Assembly enacted a new congressional map during the Second Extraordinary Session. State Defendants further admit that the Second Special Session commenced on September 3, 2025 and adjourned on September 12, 2025. State Defendants deny all other allegations in Paragraph 2.

3. State Defendants admit that Governor Kehoe, in his proclamation calling a Second Extraordinary Session, acknowledged that the 2022 congressional

map “may be vulnerable to a legal challenge under the Voting Rights Act and the Fourteenth Amendment.” State Defendants deny all other allegations in Paragraph 3.

4. State Defendants deny the allegations in Paragraph 4.

5. The allegations in Paragraph 5 describe the contents of the Missouri Constitution and a published judicial opinion from the Missouri Supreme Court, both of which speak for themselves. State Defendants deny any allegation inconsistent therewith. Paragraph 5 also contains legal conclusions that require no response. To the extent further response is required, State Defendants deny the allegations in Paragraph 5.

6. The allegations in Paragraph 6 describe the contents of the Missouri Constitution, which speaks for itself. State Defendants deny any allegation inconsistent therewith. Paragraph 6 also contains legal conclusions that require no response. To the extent further response is required, State Defendants deny the allegations in Paragraph 6.

7. The allegations in Paragraph 7 constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 7.

JURISDICTION AND VENUE

8. The allegations in Paragraph 8 constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 8.

9. State Defendants admit that Jackson County Board of Election Commissioners and the Kansas City Board of Election Commissioners are defendants in this legal action; neither, however, is a proper party. The remaining allegations in Paragraph 9 constitute a legal conclusion requiring no response. To the extent further response is required, State Defendants deny the remaining allegations in Paragraph 9.

PARTIES

10. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 10 and therefore deny them.

11. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 11 and therefore deny them.

12. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 12 and therefore deny them.

13. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 13 and therefore deny them.

14. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 14 and therefore deny them.

15. The allegations in Paragraph 15 constitute a legal conclusion to which no response is required. To the extent any response is required, State Defendants deny the allegations in Paragraph 15.

16. The allegations in Paragraph 16 constitute a legal conclusion to which no response is required. To the extent any response is required, State Defendants deny that the state of Missouri is a proper party. State Defendant further deny all other allegations in Paragraph 16.

17. State Defendants admit that Denny Hoskins is the Missouri Secretary of State and that he is sued in official capacity. The remaining allegations in Paragraph 17 describe the contents of statutes, which speak for themselves, or constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny any allegation inconsistent therewith.

18. The allegations in Paragraph 18 describe the contents of statutes, which speak for themselves. State Defendants deny any allegation inconsistent therewith. Paragraph 18 also contains legal conclusions that require no response. To the extent further response is required, State Defendants deny the allegations in Paragraph 18.

19. State Defendants admit the allegations in Paragraph 19.

20. State Defendants admit that the Jackson County Board of Election Commissioners ("JCEB") is the local election authority for Jackson County excluding the municipality of Kansas City. The remaining allegations in Paragraph 20 describe the contents of statutes, which speak for themselves, or constitute a legal conclusion

to which no response is required. To the extent further response is required, State Defendants deny any allegation inconsistent therewith.

21. State Defendants admit that Defendant Michael K. Whitehead is a commissioner and the chairman of the JCEB. State Defendants further admit that Defendant Whitehead is sued in his official capacity. The remaining allegations in Paragraph 21 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Whitehead is a proper defendant. State Defendants deny all other allegations in Paragraph 21.

22. State Defendants admit that Defendant Henry R. Carner is a commissioner and the secretary of the JCEB. State Defendants further admit Defendant Carner is sued in his official capacity. The remaining allegations in Paragraph 22 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Carner is a proper defendant. State Defendants deny all other allegations in Paragraph 22.

23. State Defendants admit that Defendant Colleen M. Scott is a commissioner of the JCEB and that she is sued in her official capacity. The remaining allegations in Paragraph 23 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Scott is a proper defendant. State Defendants deny all other allegations in Paragraph 23.

24. State Defendants admit that Defendant Lyle K. Querry is a commissioner of the JCEB and that he is sued in his official capacity. The remaining allegations in Paragraph 24 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Querry is a proper defendant. State Defendants deny all other allegations in Paragraph 24.

25. State Defendants admit that Defendant Tammy Brown is a director of the JCEB and that she is sued in her official capacity. The remaining allegations in Paragraph 25 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Brown is a proper defendant. State Defendants deny all other allegations in Paragraph 25.

26. State Defendants admit that Defendant Sara Zorich is a director of the JCEB and that she is sued in her official capacity. The remaining allegations in Paragraph 26 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Zorich is a proper defendant. State Defendants deny all other allegations in Paragraph 26.

27. State Defendants admit that the Kansas City Board of Election Commissioners (“KCEB”) is the local election authority for the municipality of Kansas City. The remainder of the allegations in Paragraph 27 describe the contents of statutes, which speak for themselves, or constitute a legal conclusion to which no

response is required. To the extent further response is required, State Defendants deny any allegation inconsistent therewith.

28. State Defendants admit that Sarah (Sally) Miller is a commissioner and the chair of the KCEB. State Defendants further admit Defendant Miller is sued in her official capacity. The remaining allegations in Paragraph 28 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Miller is a proper defendant. State Defendants deny all other allegations in Paragraph 28.

29. State Defendants admit that Sharon Turner Buie is a commissioner and the secretary of the KCEB. State Defendants further admit Defendant Buie is sued in her official capacity. The remaining allegations in Paragraph 29 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Buie is a proper defendant. State Defendants deny all other allegations in Paragraph 29.

30. State Defendants admit that Ralph F. Munyann II is a commissioner of the KCEB and that he is sued in his official capacity. The remaining allegations in Paragraph 30 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Munyann is a proper defendant. State Defendants deny all other allegations in Paragraph 30.

31. State Defendants admit that Shawn Kieffer is a director of the KCEB and that he is sued in his official capacity. The remaining allegations in

Paragraph 31 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Kieffer is a proper defendant. State Defendants deny all other allegations in Paragraph 31.

32. State Defendants admit that Lauri Ealom is a director of the KCEB and that she is sued in her official capacity. The remaining allegations in Paragraph 32 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny that Defendant Ealom is a proper defendant. State Defendants deny all other allegations in Paragraph 32.

LEGAL BACKGROUND

33. The allegations in Paragraph 33 describe the contents of the Missouri Constitution, which speaks for itself. State Defendants deny any allegation inconsistent therewith.

34. The allegations in Paragraph 33 describe the contents of the Missouri Constitution, the U.S. Constitution, and federal statutes, all of which speak for themselves. State Defendants deny any allegation inconsistent therewith.

35. The allegations in Paragraph 35 describe the contents of the Missouri Constitution, which speaks for itself. State Defendants deny any allegation inconsistent therewith. Paragraph 35 also contains legal conclusions that require no response. To the extent an additional response is required, State Defendants deny the allegations in Paragraph 35.

36. The allegations in Paragraph 36 quote a published judicial opinion, which speaks for itself. State Defendants deny any allegation inconsistent therewith. Paragraph 36 also contains legal conclusions that require no response. To the extent an additional response is required, State Defendants deny the allegations in Paragraph 36.

37. State Defendants admit the allegations in Paragraph 37.

38. The allegations in Paragraph 38 describe the contents of a statute, which speaks for itself. State Defendants deny any allegation inconsistent therewith. Paragraph 38 also contains legal conclusions that require no response. To the extent an additional response is required, State Defendants deny the allegations in Paragraph 38.

39. The allegations in Paragraph 39 describe the contents of the Missouri Constitution, which speaks for itself. State Defendants deny any allegation inconsistent therewith.

40. The allegations in Paragraph 40 constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 40.

41. The allegations in Paragraph 41 describe the contents of the Missouri Constitution, which speaks for itself. State Defendants deny any allegation inconsistent therewith.

42. The allegations in Paragraph 42 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 42.

43. The allegations in Paragraph 43 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 43.

44. The allegations in Paragraph 44 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 44.

45. The allegations in Paragraph 45 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 45.

46. The allegations in Paragraph 46 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 46.

47. The allegations in Paragraph 47 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 47.

48. The allegations in Paragraph 48 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 48.

49. The allegations in Paragraph 49 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 49.

50. The allegations in Paragraph 50 describe a published judicial opinion, which speaks for itself, or constitute a legal conclusion requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 50.

FACTUAL ALLEGATIONS

Missouri's 2022 Congressional Map

51. State Defendants admit that the Missouri General Assembly enacted a redistricting plan for congressional districts in 2022. State Defendants deny all other allegations in Paragraph 51.

52. State Defendants admit that the map on page 11 of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief appears on its face to reflect the redistricting plan that was enacted by the General Assembly in 2022. State Defendants further admit that the map enacted by the General Assembly in 2022 was used in the 2022 and 2024 primary and general elections. State Defendants deny all other allegations in Paragraph 52.

53. The allegations in Paragraph 53 constitute a legal conclusion to which no response is required. To the extent further response is required, State Defendants deny the allegations in Paragraph 53.

54. State Defendants admit that the map on page 12 of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief appears on its face to reflect CD5 as configured in the redistricting plan enacted by the General Assembly in 2022. State Defendants deny all other allegations in Paragraph 54.

55. State Defendants deny the allegations in Paragraph 55.

56. State Defendants deny the allegations in Paragraph 56.

57. State Defendants deny the allegations in Paragraph 57.

58. State Defendants deny the allegations in Paragraph 58.

59. State Defendants deny the allegations in Paragraph 59.

60. State Defendants deny the allegations in Paragraph 60.

61. State Defendants deny the allegations in Paragraph 61.

62. State Defendants deny the allegations in Paragraph 62.

63. State Defendants deny the allegations in Paragraph 63.

64. State Defendants deny the allegations in Paragraph 64.

65. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations regarding the map on page 15 of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief and therefore deny them. The remaining allegations in Paragraph 65 contain legal conclusions to which no response is required. To the extent further response is required, State Defendants deny the allegations in Paragraph 65.

66. The allegations in Paragraph 66 contain legal conclusions to which no response is required. To the extent any response is required, State Defendants deny the allegations in Paragraph 66.

67. The allegations in Paragraph 67 contain legal conclusions to which no response is required. To the extent any response is required, State Defendants deny the allegations in Paragraph 67.

68. State Defendants deny the allegations in Paragraph 68.

69. State Defendants deny the allegations in Paragraph 69.

70. State Defendants deny the allegations in Paragraph 70.

71. State Defendants deny the allegations in Paragraph 71.

72. State Defendants deny the allegations in Paragraph 72.

73. State Defendants deny the allegations in Paragraph 73.

74. State Defendants admit that the congressional map enacted by the General Assembly in 2022 was used in the 2022 and 2024 primary and general elections. State Defendants deny all other allegations in Paragraph 74.

75. State Defendants admit the allegation in Paragraph 75.

76. State Defendants admit the allegation in Paragraph 76.

77. State Defendants admit the allegations in Paragraph 77.

78. State Defendants admit the allegations in Paragraph 78.

79. State Defendants admit the allegation in Paragraph 79.

80. State Defendants admit the allegation in Paragraph 80.

81. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 81 and therefore deny them.

82. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 82 and therefore deny them.

83. State Defendants deny the allegations in Paragraph 83.

84. State Defendants deny the allegations in Paragraph 84.

85. State Defendants deny the allegation in Paragraph 85.

86. State Defendants admit that the 2022 Map passed the Missouri General Assembly. State Defendants lack sufficient information to form a belief as to the truth or falsity about the remaining allegations in Paragraph 86 and therefore deny them.

87. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 87 and therefore deny them.

88. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 88 and therefore deny them.

Missouri's Unprecedented 2025 Mid-Decade Redistricting

89. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 89 and therefore deny them.

90. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 90 and therefore deny them.

91. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 91 and therefore deny them.

92. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 92 and therefore deny them.

93. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 93 and therefore deny them.

94. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 94.

95. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 95.

96. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 96.

97. State Defendants admit that Governor Kehoe issued a Proclamation calling a special session of the general assembly on August 29, 2025. The remainder of the allegations in Paragraph 97 describe the contents of the Proclamation, which speaks for itself. State Defendants deny any allegations inconsistent therewith.

98. The allegations in Paragraph 98 describe the contents of the Proclamation, which speaks for itself. State Defendants deny any allegations inconsistent therewith.

99. State Defendants admit the allegations in Paragraph 99.

100. State Defendants admit the allegations in Paragraph 100.

101. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 101.

102. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 102.

103. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 103.

104. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 104.

105. State Defendants admit the allegations in Paragraph 105.

106. State Defendants admit the allegations in Paragraph 106.

107. State Defendants admit the allegations in Paragraph 107.

108. State Defendants admit that H.B. 1 was reported out “do pass” to the House of Representatives on September 8, 2025. State Defendants deny all other allegation in Paragraph 108.

109. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 109.

110. State Defendants admit that the House passed H.B. 1 on September 9, 2025. State Defendants deny all other allegations in Paragraph 110.

111. State Defendants admit the allegations in Paragraph 111.

112. State Defendants admit that H.B. 1 was reported “do pass” to the Senate and was passed on September 12, 2025. State Defendants deny all other allegations in Paragraph 112.

Missouri’s 2025 Congressional Map(s)

113. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 113.

114. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 114.

115. State Defendants deny the allegations in Paragraph 115.

116. State Defendants deny the allegations in Paragraph 116.

117. The allegations in Paragraph 117 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 117.

118. State Defendants deny the allegations in Paragraph 118.
119. State Defendants deny the allegations in Paragraph 119.
120. State Defendants deny the allegations in Paragraph 120.
121. State Defendants deny the allegations in Paragraph 121.
122. State Defendants deny the allegations in Paragraph 122.
123. The allegations in Paragraph 123 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 123.
124. State Defendants deny the allegations in Paragraph 124.
125. State Defendants deny the allegations in Paragraph 125.
126. State Defendants admit that the map on page 27 of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief appears on its face to reflect the redistricting plan that was enacted by the General Assembly in 2025. State Defendants deny all other allegations in Paragraph 126.
127. State Defendants deny the allegations in Paragraph 127.
128. State Defendants deny the allegations in Paragraph 128.
129. State Defendants deny the allegations in Paragraph 129.
130. State Defendants admit that the map on page 28 of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief appears on its face to depict the new CD5. State Defendants deny all other allegations in Paragraph 130.

131. State Defendants admit that the map on page 29 of Plaintiffs' Petition for Declaratory Judgment and Injunctive Relief appears on its face to depict the new CD4. State Defendants deny all other allegations in Paragraph 131.

132. State Defendants deny the allegations in Paragraph 132.

133. State Defendants deny the allegations in Paragraph 133.

134. State Defendants deny the allegations in Paragraph 134.

135. State Defendants deny the allegations in Paragraph 135.

136. The allegations in Paragraph 136 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 136.

137. The allegations in Paragraph 137 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 137.

138. State Defendants deny the allegations in Paragraph 138.

139. The allegations in Paragraph 139 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 139.

140. State Defendants deny the allegations in Paragraph 140.

141. State Defendants admit the allegations in Paragraph 141.

142. State Defendants deny the allegations in Paragraph 142.

143. State Defendants deny the allegations in Paragraph 143.

144. The allegations in Paragraph 144 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 144.

145. The allegations in Paragraph 145 describe the contents of the Proclamation, which speaks for itself, State Defendants deny any allegations inconsistent therewith. State Defendants deny the other allegations in Paragraph 145.

146. The allegations in Paragraph 146 quote a published judicial opinion, which speaks for itself, or constitute legal conclusions that require no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 146.

147. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 147 and therefore deny them.

148. The allegations in Paragraph 148 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 148.

149. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 149 and therefore deny them.

150. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 150 and therefore deny them.

151. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 151 and therefore deny them.

152. The allegations in Paragraph 152 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 152.

153. The allegations in Paragraph 153 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 153.

154. State Defendants lack sufficient information to form a belief as to the truth or falsity of the allegations in Paragraph 154 and therefore deny them.

155. State Defendants deny the allegation in Paragraph 155.

156. The allegations in Paragraph 156 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 156.

157. State Defendants deny the allegations in Paragraph 157.

158. State Defendants deny the allegations in Paragraph 158.

159. The allegations in Paragraph 159 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 159.

160. State Defendants deny the allegations in Paragraph 160.

161. State Defendants deny the allegations in Paragraph 161.

162. State Defendants deny the allegations in Paragraph 162.
163. State Defendants admit that the 2025 congressional map splits fewer counties than the previous map. State Defendants deny all other allegations in Paragraph 163.
164. State Defendants deny the allegations in Paragraph 164.
165. State Defendants deny the allegations in Paragraph 165.
166. State Defendants deny the allegations in Paragraph 166.
167. State Defendants deny the allegations in Paragraph 167.
168. State Defendants deny the allegations in Paragraph 168.
169. State Defendants deny the allegations in Paragraph 169.
170. State Defendants deny the allegations in Paragraph 170.
171. State Defendants deny the allegations in Paragraph 171.
172. State Defendants deny the allegations in Paragraph 172.
173. State Defendants deny the allegations in Paragraph 173.
174. State Defendants deny the allegations in Paragraph 174.
175. The allegations in Paragraph 175 quote a published judicial opinion, which speaks for itself, or constitute legal conclusions that require no response. To the extent a response is required, State Defendants deny the allegations in Paragraph 175.
176. State Defendants deny the allegations in Paragraph 176.

CAUSES OF ACTION

COUNT I

Violation of the Timing Requirement for Congressional Redistricting Under Article III, Section 45 of the Missouri Constitution

177. State Defendants incorporate all responses to Paragraphs 1–176 by reference, and deny any allegation contained in any footnote, header, or non-numbered paragraph throughout the Petition.

178. The allegations in Paragraph 178 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 178.

179. The allegations in Paragraph 179 describe the contents of the Missouri Constitution and published judicial opinions, both of which speak for themselves. State Defendants deny any allegation inconsistent therewith. Paragraph 179 also contains legal conclusions that require no response. To the extent an additional response is required, State Defendants deny the allegations in Paragraph 179.

180. The allegations in Paragraph 180 describe the contents of the Missouri Constitution and published judicial opinions, both of which speak for themselves. State Defendants deny any allegation inconsistent therewith. Paragraph 180 also contains legal conclusions that require no response. To the extent an additional response is required, State Defendants deny the allegations in Paragraph 180.

181. The allegations in Paragraph 181 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 181.

182. The allegations in Paragraph 182 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 182.

183. The allegations in Paragraph 183 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 183.

184. State Defendants admit that in 2022, the General Assembly enacted a congressional redistricting plan with eight seats. State Defendants deny all other allegations in Paragraph 184.

185. The allegations in Paragraph 185 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 185.

186. The allegations in Paragraph 186 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 186.

187. State Defendants deny the allegations in Paragraph 187.

188. State Defendants deny the allegations in Paragraph 188.

COUNT II

Violation of the Compactness Requirement Under Article III, Section 45 of the Missouri Constitution

189. State Defendants incorporate all responses to Paragraphs 1–188 by reference, and deny any allegation contained in any footnote, header, or non-numbered paragraph throughout the Petition.

190. The allegations in Paragraph 190 describe the contents of the Missouri Constitution and published judicial opinions, both of which speak for themselves. State Defendants deny any allegation inconsistent therewith. Paragraph 190 also contains legal conclusions that require no response. State Defendants deny any allegations that require not response. To the extent further responses is required, State Defendants deny the allegations in Paragraph 190.

191. The allegations in Paragraph 191 quote a published judicial opinion, which speaks for itself, or are legal conclusions that require no response. To the extent further responses is required, State Defendants deny the allegations in Paragraph 191.

192. The allegations in Paragraph 192 quote a published judicial opinion, which speaks for itself, or are legal conclusions that require no response. To the extent further responses is required, State Defendants deny the allegations in Paragraph 192.

193. State Defendants deny the allegations in Paragraph 193.

194. State Defendants deny the allegations in Paragraph 194.

195. State Defendants deny the allegations in Paragraph 195.

196. State Defendants deny the allegations in Paragraph 196.

197. State Defendants deny the allegations in Paragraph 197.

198. State Defendants deny the allegations in Paragraph 198.

199. State Defendants deny the allegations in Paragraph 199.

200. State Defendants deny the allegations in Paragraph 200.

201. The allegations in Paragraph 201 contain legal conclusions requiring no response. To the extent any response is required, State Defendants deny the allegations in Paragraph 201.

202. State Defendants deny the allegations in Paragraph 202.

203. State Defendants deny the allegations in Paragraph 203.

COUNT III

Violation of the Equal Population Requirement Under Article III, Section 45 of the Missouri Constitution

204. State Defendants incorporate all responses to Paragraphs 1–203 by reference, and deny any allegation contained in any footnote, header, or non-numbered paragraph throughout the Petition

205. The allegations in Paragraph 205 describe the contents of the Missouri Constitution and a published judicial opinions, both of which speak for themselves. State Defendants deny any allegation inconsistent therewith. Paragraph 205 also contains legal conclusions that require no response. To the extent further responses is required, State Defendants deny the allegations in Paragraph 205.

206. State Defendants deny the allegations in Paragraph 206.

207. State Defendants deny the allegations in Paragraph 207.

208. State Defendants deny the allegations in Paragraph 208.

209. State Defendants deny the allegations in Paragraph 209.

210. State Defendants deny the allegations in Paragraph 210.

COUNT IV

Violation of the Contiguity Requirement Under Article III, Section 45 of the Missouri Constitution

211. State Defendants incorporate all responses to Paragraphs 1–210 by reference, and deny any allegation contained in any footnote, header, or non-numbered paragraph throughout the Petition.

212. The allegations in Paragraph 205 describe the contents of the Missouri Constitution, which speaks for itself. State Defendants deny any allegations inconsistent therewith.

213. The allegations in Paragraph 213 quote a published judicial opinion, which speaks for itself, or are legal conclusions that require no response. To the extent further responses is required, State Defendants deny the allegations in Paragraph 213.

214. State Defendants deny the allegations in Paragraph 214.

215. State Defendants deny the allegations in Paragraph 215.

RELIEF REQUESTED

A. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

B. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

C. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

D. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

E. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

F. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

G. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

H. No response is required as this prayer for relief contains no allegations of fact or law. To the extent this paragraph may contain legal conclusions, those conclusions require no response. To the extent a response is required, State Defendants deny that Plaintiffs are entitled to the relief requested.

GENERAL DENIAL OF CLAIMS

1. State Defendants deny all allegations made in any header, footnote, or non-numbered paragraph of the petition, and deny that Plaintiffs have alleged any lawful claim against the State and its officers.

AFFIRMATIVE DEFENSES

1. Plaintiffs have failed to state a claim as a matter of law.

2. Plaintiffs have shown no individual harm and thus have no interest, aside from a purely conjectural interest, in the claims and therefore have no standing to bring the action.

3. Plaintiffs cannot overcome the sovereign or official immunity bars, and Defendants have not waived their immunity from suit.

4. Neither local defendant can provide Plaintiffs with effective relief. Their inclusion in the lawsuit is pretensive; hence, this Court lacks jurisdiction because venue in Jackson County is not proper.

5. This Petition raises political questions over which this Court lacks jurisdiction.

6. The Petition raises nonjusticiable questions that this Court has no jurisdiction to address.

7. To the extent federal law claims are asserted, this Court is without jurisdiction to rule upon federal law claims regarding redistricting of congressional districts.

8. State Defendants reserve the right to assert any additional defenses that may become apparent as the litigation progresses.

WHEREFORE, having fully answered, State Defendants move this Court for dismissal of the Petition, that Plaintiffs take nothing thereby, and that State Defendants be awarded the costs and expenses incurred in the action, including attorney fees, and for such other and further relief as is just and proper.

Respectfully submitted,

CATHERINE L. HANAWAY
ATTORNEY GENERAL

/s/ Louis J. Capozzi, III

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CERTIFICATE OF SERVICE

I hereby certify that, on December 22, 2025, the foregoing was filed electronically through the Court's electronic filing system to be served electronically on all counsel of record.

/s/ Louis J. Capozzi

Louis J. Capozzi III