

IN THE CIRCUIT COURT OF JACKSON COUNTY,
MISSOURI AT KANSAS CITY

TERRENCE WISE, et al.,

Plaintiffs,

v.

STATE OF MISSOURI, et al.,

Defendants.

Case No. 2516-
CV29597

Division 15

ELIZABETH HEALEY, et al.,

Plaintiffs,

v.

STATE OF MISSOURI, et al.,

Defendants.

Case No. 2516-
CV31273

Division 15

**SECRETARY OF STATE DENNY HOSKINS'S OBJECTIONS AND
RESPONSES TO HEALEY PLAINTIFFS' FIRST INTERROGATORIES**

Defendant Secretary of State Denny Hoskins, in his official capacity, by and through counsel, hereby serves the following Objections and Responses to Healey Plaintiffs' First Set of Interrogatories, pursuant to Missouri Supreme Court Rule 57.01.

INTERROGATORIES

1. Identify all analyses of the 2022 Plan conducted by, provided to, or reviewed by you or any other member of your staff, including analyses relating to the 2022 Plan's compliance with the Missouri Constitution, or performance relating to compactness, population equality, contiguity, compliance with federal law (including Section 2 of the Voting Rights Act), population density, natural boundaries, historical boundaries, political subdivision boundaries, county or municipality splits, placement of incumbents, or partisanship.

ANSWER: The Secretary has not identified any responsive information.

2. Identify all analyses of the Missouri First Plan or the 2025 Plan conducted by, provided to, or reviewed by you or any other member of your staff, including analyses relating to the Missouri First Plan's or the 2025 Plan's compliance with the Missouri Constitution, or performance relating to compactness, population equality, contiguity, compliance with federal law (including Section 2 of the Voting Rights Act), population density, natural boundaries, historical boundaries, political subdivision boundaries, county or municipality splits, placement of incumbents, or partisanship.

ANSWER: The Secretary conducted an analyses of the territories of local election authorities to identify areas whose congressional district had changed. State 00007–00009.

3. Identify all persons involved in drafting the 2025 Plan or the Missouri First Plan, all instructions or objectives provided or communicated to those individuals, and the source of those instructions or objectives.

ANSWER: The Secretary objects to Interrogatory No. 3 as irrelevant. The legislative history and subjective intent of the persons involved in drafting the 2025 Plan are not relevant to whether the map meets constitutional requirements.

Subject to and without waiving the aforementioned objection, the Secretary has no knowledge of the individuals responsible for drafting the 2025 Plan or the Missouri First Plan beyond what is publicly available. The Secretary was not involved in the process. The 2025 Plan was presented by Representative Dirk Deaton and first publicly disclosed by Governor Mike Kehoe.

4. For each person identified in response to Interrogatory No. 3, describe their role in the redistricting process, including the data, criteria, methods, tools, computer programs, or mapping software used to draw the 2025 Plan, the Missouri First Plan, or any drafts or previous versions of those plans.

ANSWER: The Secretary objects to Interrogatory No. 4 as irrelevant. The legislative history and subjective intent of the persons involved in drafting the 2025 Plan are not relevant to whether the map meets constitutional requirements.

Subject to and without waiving the aforementioned objection, the Secretary has no knowledge of the individuals responsible for drafting the 2025 Plan or the Missouri First Plan, nor such individuals' roles in the process beyond what is available to the public. The 2025 Plan was publicly disclosed by Governor Mike Kehoe and presented by Representative Dirk Deaton.

5. Identify any and all redistricting principles or legal, political, policy or other considerations Defendant believes may justify, either in whole or in part, the manner in which congressional district lines are drawn in and around the Kansas City and Jackson County area under the 2025 Plan, including but not limited to the manner in which the boundary lines are drawn between Districts 4, 5, and 6, and describe whether compliance with any such principles or considerations necessitated drawing a less compact district.

ANSWER: The Secretary objects to Interrogatory No. 5 to the extent it is vague. There are numerous measures of compactness and multiple ways of understanding whether a district is more or less compact. Subject to and without waiving this objection, the Secretary notes that district boundaries are interrelated and that increasing the compactness of districts within a geographically bound area in accordance with recognized factors may affect the compactness of neighboring districts.

The State believes that a combination of factors may justify the manner in which congressional district lines are drawn. These factors may include:

- Natural boundary lines;
- Boundaries of counties, political subdivisions, and municipalities;
- Boundary lines of prior redistricting maps and other statewide redistricting maps;

- Population density;
- Population equality;
- Continuity;
- Compactness; and
- Compliance with federal and statutory requirements.

6. Describe whether District 4 under the 2025 Plan is more or less compact than the version of District 4 that was in effect in 2024.

ANSWER: The Secretary objects to Interrogatory No. 6 as vague. There are multiple measures of compactness and multiple ways of understanding whether a district is more or less compact. In addition Missouri law incorporates recognized factors into the definition of compactness. The Secretary further objects to the extent Interrogatory No. 6 calls for information that is properly the subject of expert testimony.

Subject to and without waiving the aforementioned objections, the Secretary interprets District 4 under the 2025 Plan as more compact than the version of District 4 that was in effect in 2024.

7. Describe whether District 5 under the 2025 Plan is more or less compact than the version of District 5 that was in effect in 2024.

ANSWER: The Secretary objects to Interrogatory No. 7 as vague. There are multiple measures of compactness and multiple ways of understanding whether a district is more or less compact. In addition Missouri law incorporates recognized factors into the definition of compactness. The Secretary further objects to the extent Interrogatory 7 No. calls for information that is properly the subject of expert testimony.

Subject to and without waiving the aforementioned objections, the Secretary interprets District 5 under the 2025 Plan as more compact than the version of District 5 that was in effect in 2024.

8. Describe whether District 6 under the 2025 Plan is more or less compact than the version of District 6 that was in effect in 2024.

ANSWER: The Secretary objects to Interrogatory No. 8 as vague. There are multiple measures of compactness and multiple ways of understanding whether a district is more or less compact. In addition Missouri law incorporates recognized factors into the definition of compactness. The Secretary further objects to the extent Interrogatory

No. 8 calls for information that is properly the subject of expert testimony.

Subject to and without waiving the aforementioned objections, the Secretary interprets District 6 under the 2025 Plan as more compact than the version of District 6 that was in effect in 2024.

Dated: January 14, 2026

Respectfully submitted,

CATHERINE L. HANAWAY
MISSOURI ATTORNEY GENERAL

/s/ Madeline S. Lansdell

Louis J. Capozzi III, #77756

Solicitor General

Kathleen T. Hunker, *adm. pro hac vice*

Principal Deputy Solicitor General

Patrick Sullivan, #42968

Deputy Solicitor General

Madeline S. Lansdell, #78358

Assistant Solicitor General

Matthew J. Tkachuk, #74874

Assistant Attorney General

Office of the Attorney General

Old Post Office Building

815 Olive St, Suite 200

St. Louis, MO 63101

Office: (314) 340-3413

Counsel for State Defendants