

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

TERRENCE WISE, <i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	Case No. 2516-CV29597
)	
STATE OF MISSOURI, <i>et al.</i> ,)	
Defendants.)	

ELIZABETH HEALEY, <i>et al.</i> ,)	
Plaintiffs,)	
)	
v.)	Case No. 2516-CV31273
)	
STATE OF MISSOURI, <i>et al.</i> ,)	
Defendants.)	

INTERVENOR'S ANSWERS TO PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSIONS

Intervenor Missouri Republican State Committee, by and through counsel, and for its objections and answers to Plaintiffs' First Set of Requests for Admissions to Intervenor, hereby states as follows:

REQUESTS FOR ADMISSION

1. Plaintiff Terrence Wise is a qualified voter and resident of Kansas City, Missouri.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

2. Plaintiff Wise resided in CD 5 under the 2022 Congressional Map and resides in CD 5 under the 2025 Congressional Map.

ANSWER: Intervenor is without knowledge as to the truth or

lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

3. Plaintiff Ashley Ball is a qualified voter and resident of Kansas City, Missouri.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

4. Plaintiff Ball resided in CD 5 under the 2022 Congressional Map and resides in CD 5 under the 2025 Congressional Map.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

5. Plaintiff Aimee Riederer Gromowsky is a qualified Missouri voter and resident of Kansas City, Missouri.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

6. Plaintiff Gromowsky resided in CD 5 under the 2022 Congressional Map and resides in CD 4 under the 2025 Congressional Map.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from

Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

7. Plaintiff Cynthia Wrehe is a qualified voter and resident of Lee's Summit, Missouri.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

8. Plaintiff Wrehe resided in CD 5 under the 2022 Congressional Map and resides in CD 4 under the 2025 Congressional Map.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

9. Plaintiff Cynthia Kay Lakin is a qualified voter and resident of Kansas City, Missouri.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

10. Plaintiff Lakin resided in CD 5 under the 2022 Congressional Map and resides in CD 6 under the 2025 Congressional Map.

ANSWER: Intervenor is without knowledge as to the truth or lack thereof of this assertion and has asked for an affidavit from Plaintiff to support this factual contention. Further, Intervenor

does not have access to individualized voter records from which to obtain sufficient knowledge to admit or deny this Request. To the extent that an answer is required, Intervenor denies.

11. H.B. 1 assigns Voting Tabulation District (VTD) Kansas City 811, in its entirety, to both CD 4 and CD 5.

ANSWER: Deny. Intervenor states that there are two separate VTD 811's in Kansas City, one of which is assigned to CD 5 and the other of which is assigned to CD 4. The KC VTD 811 assigned to CD 5 has a GeoID of 29095000484. The KC VTD 811 assigned to CD 4 has a GeoID of 29095K16811.

12. Two non-contiguous (i.e., geographically disconnected) areas are identified as VTD Kansas City 811.

ANSWER: Deny. Intervenor states that there are two separate VTD 811's in Kansas City, one of which is assigned to CD 5 and the other of which is assigned to CD 4. The KC VTD 811 assigned to CD 5 has a GeoID of 29095000484. The KC VTD 811 assigned to CD 4 has a GeoID of 29095K16811.

13. If the areas identified in H.B. 1 as VTD Kansas City 811 are assigned entirely to CD 5, then CD 5 does not consist of contiguous territory.

ANSWER: Deny. Intervenor states that there are two separate VTD 811's in Kansas City, one of which is assigned to CD 5 and the other of which is assigned to CD 4. The KC VTD 811 assigned to CD 5 has a GeoID of 29095000484. The KC VTD 811 assigned to CD 4 has a GeoID of 29095K16811. Assigning each separate area to the same district would create an island of non-contiguous territory; however, since the two areas were assigned separately in HB 1, this hypothetical has not occurred and the territory of CD 4 and CD 5 are each entirely contiguous.

14. If the areas identified in H.B. 1 as VTD Kansas City 811 are assigned entirely to CD 4, neither CD 4 nor CD 5 is as equal in population to the other congressional districts as possible.

ANSWER: Deny. Intervenor states that there are two separate VTD 811's in Kansas City, one of which is assigned to CD 5 and

the other of which is assigned to CD 4. The KC VTD 811 assigned to CD 5 has a GeoID of 29095000484. The KC VTD 811 assigned to CD 4 has a GeoID of 29095K16811. Assigning each separate area to the same district would create an unequal population in each district; however, since the two areas were assigned separately in HB 1, this hypothetical has not occurred and the populations of CD 4 and CD5 are equal.

15. If the area identified in H.B. 1 as VTD Kansas City 811 is assigned entirely to CD 5, neither CD 4 nor CD 5 is as equal in population to the other congressional districts as possible.

ANSWER: Deny. Intervenor states that there are two separate VTD 811's in Kansas City, one of which is assigned to CD 5 and the other of which is assigned to CD 4. The KC VTD 811 assigned to CD 5 has a GeoID of 29095000484. The KC VTD 811 assigned to CD 4 has a GeoID of 29095K16811. Assigning each separate area to the same district would create an unequal population in each district; however, since the two areas were assigned separately in HB 1, this hypothetical has not occurred and the populations of CD 4 and CD5 are equal.

16. All districts in the 2022 Congressional Map complied with Section 2 of the Voting Rights Act.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent a response is required, Intervenor denies the same and states that only a court can determine if a congressional district complies with the Voting Rights Act. The plain text of the Voting Rights Act, moreover, exclusively authorizes only the Attorney General of the United States, not private parties, to bring actions to enforce Section 2, and the Attorney General of the United States has not brought any such action. Furthermore, enforcement of Section 2 is vested exclusively in federal courts. No private party has a right to seek adjudication of, and no state court has jurisdiction to adjudicate, the question whether a congressional district complies with the Voting Rights Act as

Plaintiffs seek here.

17. All districts in the 2022 Congressional Map complied with the Equal Protection Clause to the U.S. Constitution.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent a response is required Intervenor denies the same.

18. The reconfiguration of CD 4 and CD 5 in the 2025 Congressional Map was not required by Section 2 of the Voting Rights Act.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent a response is required Intervenor denies the same. and states that only a court can determine if a congressional district complies with the Voting Rights Act. The plain text of the Voting Rights Act, moreover, exclusively authorizes the Attorney General of the United States, not private parties, to bring actions to enforce Section 2, and the Attorney General of the United States has not brought any such action. Furthermore, enforcement of Section 2 is vested exclusively in federal courts. No private party has a right to seek adjudication of, and no state court has jurisdiction to adjudicate, the question whether a congressional district complies with the Voting Rights Act as Plaintiffs seek here.

19. The reconfiguration of CD 4 and CD 5 in the 2025 Congressional Map was not required by the Equal Protection Clause to the U.S. Constitution.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent a response is required Intervenor denies the same.

20. Neither the General Assembly nor the Governor conducted an analysis to determine whether there is a racial minority group sufficiently large and geographically compact to constitute a majority in a reasonable configuration of CD 4 or CD 5.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent a response is required Intervenor denies the same. Intervenor further states that the question whether a racial minority group is sufficiently large and geographically compact to constitute a majority in a reasonable configuration of CD 4 or CD 5 would arise, if at all, only under Section 2 of the Voting Rights Act, and that only a court can determine whether a congressional district complies with the Voting Rights Act. The plain text of the Voting Rights Act, moreover, exclusively authorizes only the Attorney General of the United States, not private parties, to bring actions to enforce Section 2, and the Attorney General of the United States has not brought any such action. Furthermore, enforcement of Section 2 is vested exclusively in federal courts. No private party has a right to seek adjudication of, and no state court has jurisdiction to adjudicate, the question whether a congressional district complies with the Voting Rights Act as Plaintiffs seek here.

21. Neither the General Assembly nor the Governor conducted a racial polarization analysis of CD 4 and CD 5 in 2025.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

OBJECTION, THIS REQUEST USES THE VAGUE AND UNDEFINED TERM “RACIAL POLARIZATION ANALYSIS” AND DOES NOT REQUIRE AN ANSWER.

To the extent a response is required Intervenor denies the same and states that “racial polarization analysis” is vague and

undefined. Intervenor further states that to the extent Request No. 21 refers to a “racially polarized voting analysis,” such an analysis is relevant, if at all, only to claims brought under Section 2 of the Voting Rights Act, and that the United States Supreme Court has not authoritatively defined or clarified the meaning of that term. Intervenor reiterates that only a court can determine whether a congressional district complies with the Voting Rights Act. The plain text of the Voting Rights Act, moreover, exclusively authorizes only the Attorney General of the United States, not private parties, to bring actions to enforce Section 2, and the Attorney General of the United States has not brought any such action. Furthermore, enforcement of Section 2 is vested exclusively in federal courts. No private party has a right to seek adjudication of, and no state court has jurisdiction to adjudicate, the question whether a congressional district complies with the Voting Rights Act as Plaintiffs seek here.

22. CD 4 is not an opportunity district.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent that an answer is required Intervenor admits and states that CD4 is not an “opportunity district” under either the 2022 Congressional Map or the 2025 Congressional Map. Intervenor further states that the question whether any version of CD 4 is an “opportunity district” would arise, if at all, only under Section 2 of the Voting Rights Act, and that only a court can determine whether a congressional district complies with the Voting Rights Act. The plain text of the Voting Rights Act, moreover, exclusively authorizes only the Attorney General of the United States, not private parties, to bring actions to enforce Section 2, and the Attorney General of the United States has not brought any such action. Furthermore, enforcement of Section 2 is vested exclusively in federal courts. No private party has a right to seek adjudication of, and no state court has jurisdiction to adjudicate, the question whether a congressional district complies with the Voting Rights Act as Plaintiffs seek here.

23. CD 5 is not an opportunity district.

ANSWER: OBJECTION, THIS REQUEST CALLS FOR A LEGAL CONCLUSION RATHER THAN A FACTUAL ADMISSION OR THE APPLICATION OF LAW TO FACTS AND THEREFORE DOES NOT REQUIRE AN ANSWER.

To the extent that an answer is required Intervenor admits and states that CD 5 is not an “opportunity district” under either the 2022 Congressional Map or the 2025 Congressional Map. Intervenor further states that the question whether any version of CD 4 is an “opportunity district” would arise, if at all, only under Section 2 of the Voting Rights Act, and that only a court can determine whether a congressional district complies with the Voting Rights Act. The plain text of the Voting Rights Act, moreover, exclusively authorizes only the Attorney General of the United States, not private parties, to bring actions to enforce Section 2, and the Attorney General of the United States has not brought any such action. Furthermore, enforcement of Section 2 is vested exclusively in federal courts. No private party has a right to seek adjudication of, and no state court has jurisdiction to adjudicate, the question whether a congressional district complies with the Voting Rights Act as Plaintiffs seek here.

24. It is possible to draw CD 4 to be more compact than in the 2025 Congressional Map.

ANSWER: Admit and Intervenor states that the 2025 congressional district plan established in HB 1 is overall more compact than the prior plan established in 2022. Furthermore, Intervenor states no alternative plan for congressional districts reflecting a more (or less) compact CD 4 or any other district was submitted to the General Assembly in 2025 and that CD 4 is reasonably compact as can be.

25. It is possible to draw CD 5 to be more compact than in the 2025 Congressional Map.

ANSWER: Admit and Intervenor states that the 2025 congressional district plan established in HB 1 is overall more compact than the prior plan established in 2022. Furthermore, Intervenor states no alternative plan for congressional districts reflecting a more (or less) compact CD 5 or any other district was submitted to the General Assembly in 2025 and that CD 4 is

reasonably compact as can be.

26. It is possible to reconfigure CD 4 and CD 5 such that both districts are more compact than in the 2025 Congressional Map.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

27. The configuration of CD 4 and CD 5 was more compact in the 2022 Congressional Map than in the 2025 Congressional Map.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

28. Kansas City made up a majority of the population of at least one congressional district in Missouri since at least 1921, until the enactment of the 2025 Congressional Map.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

29. In the November 5, 2024 general election, Republican presidential candidate Donald J. Trump received 1,751,986 votes in Missouri.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no

more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

30. In the November 5, 2024 general election, Democratic presidential candidate Kamala D. Harris received 1,200,599 votes in Missouri.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

31. REQUEST NO. 31: In the November 3, 2020 general election, Republican presidential candidate Donald J. Trump received 1,718,736 votes in Missouri.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

32. In the November 3, 2020 general election, Republican presidential candidate Joseph R. Biden received 1,253,014 votes in Missouri.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

33. Preserving incumbent Rep. Cleaver's electoral prospects, such as

by avoiding placing him in the same congressional district as another incumbent, was not one of the goals of Missouri's congressional redistricting in 2025.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

34. The 2025 Congressional Map increases the number of Missouri’s congressional districts in which Republican candidates are likely to prevail, from six under the 2022 Congressional Map to seven under the 2025 Congressional Map.

ANSWER: Intervenor objects to this request on the basis that under Rule 59.01 “a party may serve upon any other party no more than 25 written requests for admission, without leave of court or stipulation of the parties[.]” Mo. Sup. Court Rule 59.01(a). As no such leave or stipulation is present, this request exceeds the limit on requests for admissions and requires no response.

Respectfully submitted,

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Attorneys for Intervenor

Missouri Republican State Committee

VERIFICATION

STATE OF MISSOURI)
) ss
 COUNTY OF GREENE)

The undersigned, being first duly sworn upon his oath, states that:

1. I am the Executive Director of the Republican Party, and I am the agent of that entity for the purposes of answering to the foregoing requests for admissions served upon Missouri Republican State Committee.

2. I have read the said requests for admissions, and the answers thereto are true and correct to the best of my knowledge, information, and belief.

Signature: 

Print Name: Miles Ross

Title: Executive Director

Subscribed and sworn to before me, the undersigned, a Notary Public in and for the county and state aforesaid, on this 15th day of January 2026.




 Notary Public

My Commission Expires: 4/20/2027