

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

TERRENCE WISE, et al.,

Plaintiffs,

v.

Case No. 2516-CV29597

STATE OF MISSOURI, et al.,

Division 15

Defendants.

ELIZABETH HEALEY, et al.,

Plaintiffs,

v.

Case No. 2516-CV31273

STATE OF MISSOURI, et al.,

Division 15

Defendants.

**DEFENDANT SECRETARY OF STATE DENNY HOSKINS'S
OBJECTIONS AND RESPONSES TO PLAINTIFFS TERRENCE WISE
ET AL.'S FIRST SET OF REQUESTS FOR ADMISSIONS**

Defendant Secretary of State Denny Hoskins, in his official capacity, by and through counsel, hereby serves the following Objections and Responses to Wise Plaintiffs' First Set of Requests for Admission, pursuant to Missouri Supreme Court Rule 59.01.¹

¹ The Wise Plaintiffs served discovery jointly upon the Secretary and the State of Missouri. Because the Secretary of State and State of Missouri are separate parties to this lawsuit, each Defendant responded to the requests individually.

REQUESTS FOR ADMISSION

Admit the truth of the following matters:

REQUEST NO. 1: Plaintiff Terrence Wise is a qualified voter and resident of Kansas City, Missouri.

ANSWER: The Secretary confirms that there is a Terrence Wise in Kansas City who is listed as a qualified voter and resident. However, the Secretary cannot confirm whether Plaintiff Terrance Wise is that person and therefore cannot admit or deny Request No. 1.

REQUEST NO. 2: Plaintiff Wise resided in CD 5 under the 2022 Congressional Map and resides in CD 5 under the 2025 Congressional Map.

ANSWER: The Secretary confirms that there is a Terrence Wise that resided in District 5 under the 2022 Plan, but cannot confirm whether Plaintiff Terrence Wise is that person. In addition, the Secretary cannot confirm the congressional district assignments of individual voters under the 2025 Plan and therefore cannot admit or deny Request No. 2.

REQUEST NO. 3: Plaintiff Ashley Ball is a qualified voter and resident of Kansas City, Missouri.

ANSWER: The Secretary confirms that there are two individuals named Ashley Ball in Kansas City who are listed as qualified voters and residents.

However, the Secretary cannot confirm Plaintiff Ashley Ball is either person and therefore cannot admit or deny Request No. 3.

REQUEST NO. 4: Plaintiff Ball resided in CD 5 under the 2022 Congressional Map and resides in CD 5 under the 2025 Congressional Map.

ANSWER: Because there are two individuals named Ashley Ball in Kansas City, the Secretary cannot confirm whether Ashley Ball resided in District 5 under the 2022 Congressional Map. In addition, the Secretary cannot confirm the congressional district assignments of individual voters under the 2025 Plan and therefore cannot admit or deny Request No. 4.

REQUEST NO. 5: Plaintiff Aimee Riederer Gromowsky is a qualified Missouri voter and resident of Kansas City, Missouri.

ANSWER: The Secretary confirms that there is an Aimee Riederer Gromowsky in Kansas City who is listed as a qualified voter and resident. However, the Secretary cannot confirm whether Plaintiff Aimee Riederer Gromowsky is that person and therefore cannot admit or deny Request No. 5.

REQUEST NO. 6: Plaintiff Gromowsky resided in CD 5 under the 2022 Congressional Map and resides in CD 4 under the 2025 Congressional Map.

ANSWER: The Secretary confirms that there is an Aimee Riederer Gromowsky that resided in District 5 under the 2022 Plan, but cannot confirm whether Plaintiff Aimee Riederer Gromowsky is that person. In addition, the

Secretary cannot confirm the congressional district assignments of individual voters under the 2025 Plan and therefore cannot admit or deny Request No. 6.

REQUEST NO. 7: Plaintiff Cynthia Wrehe is a qualified voter and resident of Lee's Summit, Missouri.

ANSWER: The Secretary confirms that there is a Cynthia Wrehe in Lee's Summit who is listed as a qualified voter and resident. However, the Secretary cannot confirm whether Plaintiff Cynthia Wrehe is that person and therefore cannot admit or deny Request No. 7.

REQUEST NO. 8: Plaintiff Wrehe resided in CD 5 under the 2022 Congressional Map and resides in CD 4 under the 2025 Congressional Map.

ANSWER: The Secretary confirms that there is a Cynthia Wrehe that resided in District 5 under the 2022 Plan, but cannot confirm whether Plaintiff Cynthia Wrehe is that person. In addition, the Secretary cannot confirm the congressional district assignments of individual voters under the 2025 Plan and therefore cannot admit or deny Request No. 8.

REQUEST NO. 9: Plaintiff Cynthia Kay Lakin is a qualified voter and resident of Kansas City, Missouri.

ANSWER: The Secretary confirms that there is a Cynthia Kay Lakin in Kansas City who is listed as a qualified voter and resident. However, the

Secretary cannot confirm whether Plaintiff Cynthia Kay Lakin is that person and therefore cannot admit or deny Request No. 9.

REQUEST NO. 10: Plaintiff Lakin resided in CD 5 under the 2022 Congressional Map and resides in CD 6 under the 2025 Congressional Map.

ANSWER: The Secretary confirms that there is a Cynthia Lakin that resided in District 5 under the 2022 Plan, but cannot confirm whether Plaintiff Cynthia Lakin is that person. In addition, the Secretary cannot confirm the congressional district assignments of individual voters under the 2025 Plan and therefore cannot admit or deny Request No. 10.

REQUEST NO. 11: H.B. 1 assigns Voting Tabulation District (VTD) Kansas City 811, in its entirety, to both CD 4 and CD 5.

ANSWER: Deny.

REQUEST NO. 12: Two non-contiguous (i.e., geographically disconnected) areas are identified as VTD Kansas City 811.

ANSWER: The Secretary admits that there are two separate and geographically distinct VTDs labeled 811, one of which is in CD 4 and one of which is in CD 5; the Secretary admits that these two separate VTDS are not adjacent to one another and therefore non-contiguous. The Secretary denies the remainder of this request.

REQUEST NO. 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: The Secretary objects to Request No. 13 as argumentative and as an improper and incomplete hypothetical question to a party.

REQUEST NO. 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: The Secretary objects to Request No. 14 as argumentative and as an improper and incomplete hypothetical question to a party.

REQUEST NO. 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: The Secretary objects to Request No. 15 as argumentative and as an improper and incomplete hypothetical question to a party.

REQUEST NO. 16: All districts in the 2022 Congressional Map complied with Section 2 of the Voting Rights Act.

ANSWER: The Secretary cannot truthfully admit or deny Request No. 16 because the Secretary has not conducted a legal analysis of the 2022 Congressional Map's compliance with the Voting Rights Act.

REQUEST NO. 17: All districts in the 2022 Congressional Map complied with the Equal Protection Clause to the U.S. Constitution.

ANSWER: The Secretary cannot truthfully admit or deny Request No. 17 because the Secretary has not conducted a legal analysis to determine if the 2022 Congressional Map complied with the Equal Protection Clause.

REQUEST NO. 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: The Secretary cannot truthfully admit or deny Request No. 18 because the Secretary has not conducted a legal analysis to determine whether CD 4 and CD 5 comply with Section 2 of the Voting Rights Act.

REQUEST NO. 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: The Secretary cannot truthfully admit or deny Request No. 18 because the Secretary has not conducted a legal analysis to determine whether CD 4 and CD 5 comply with the Equal Protection Clause.

REQUEST NO. 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: The Secretary of State cannot truthfully admit or deny Request No. 20 because the Secretary does not have knowledge of whether the Governor or the General Assembly 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.

REQUEST NO. 21: Neither the General Assembly nor the Governor conducted a racial polarization analysis of CD 4 and CD 5 in 2025.

ANSWER: The Secretary cannot truthfully admit or deny Request No. 21 because the Secretary does not have knowledge of whether the General Assembly nor the Governor conducted a racial polarization analysis of CD 4 and CD 5 in 2025.

REQUEST NO. 22: CD 4 is not an opportunity district.

ANSWER: The Secretary cannot truthfully admit or deny Request No. 22 because the Secretary has not conducted an analysis of whether CD 4 is or is not an opportunity district.

REQUEST NO. 23: CD 5 is not an opportunity district.

ANSWER: The Secretary cannot truthfully admit or deny Request No. 22 because the Secretary has not conducted an analysis of whether CD 4 is or is not an opportunity district.

REQUEST NO. 24: It is possible to draw CD 4 to be more compact than in the 2025 Congressional Map.

ANSWER: The Secretary objects to Request No. 24 as seeking information that requires expert opinion. The Secretary has disclosed Dr. Sean Trende as its expert, and his report has been provided to Plaintiffs.

REQUEST NO. 25: It is possible to draw CD 5 to be more compact than in the 2025 Congressional Map.

ANSWER: The Secretary objects to Request No. 25 as seeking information that requires expert opinion. The Secretary has disclosed Dr. Sean Trende as its expert, and his report has been provided to Plaintiffs.

REQUEST NO. 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: The Secretary objects to Request for Admission No. 26 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 27: The configuration of CD 4 and CD 5 was more compact in the 2022 Congressional Map than in the 2025 Congressional Map.

ANSWER: The Secretary objects to Request for Admission No. 27 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 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: The Secretary objects to Request for Admission No. 28 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 29: In the November 5, 2024 general election, Republican presidential candidate Donald J. Trump received 1,751,986 votes in Missouri.

ANSWER: The Secretary objects to Request for Admission No. 29 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 30: In the November 5, 2024 general election, Democratic presidential candidate Kamala D. Harris received 1,200,599 votes in Missouri.

ANSWER: The Secretary objects to Request for Admission No. 30 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

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

ANSWER: The Secretary objects to Request for Admission No. 31 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 32: In the November 3, 2020 general election, Republican presidential candidate Joseph R. Biden received 1,253,014 votes in Missouri.

ANSWER: The Secretary objects to Request for Admission No. 32 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 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: The Secretary objects to Request for Admission No. 33 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

REQUEST NO. 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: The Secretary objects to Request for Admission No. 34 as exceeding the limits for Requests for Admission under Rule 59.01. Under Rule 59.01, each party may propound no more than 25 requests for admission upon each party.

Dated: January 16, 2026

Respectfully submitted,

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