

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 11

**Statement of Basis for Jurisdiction**

Article V, section 3 of the Missouri Constitution provides that this Court has exclusive jurisdiction over “the validity ... of a statute or provision of the constitution of this state[.]”

Pursuant to Rule 81.08(a), Plaintiffs submit the following explanation of the Supreme Court’s appellate Jurisdiction in this case.

This case challenges the constitutionality of Missouri’s 2025 congressional redistricting map enacted in House Bill 1 (“H.B. 1” or the “2025 Map”) (codified as §§ 128.345, 128.346, 128.348, 128.471, 128.472, 128.473, 128.474, 128.475, 128.476, 128.477, 128.478, and 128.479). Plaintiffs asserted various claims under Article III, § 45 of the Missouri Constitution, which governs congressional redistricting.

On March 12, 2026, the circuit court entered Order and Judgment against Plaintiffs and in favor of Defendants on Counts II (Violation of the Compactness Requirement Under Art. III, § 45 of the Missouri Constitution), III (Violation of the Equal Population Requirement Under Art. III, § 45 of the Missouri Constitution), and IV (Violation of the Contiguity Requirement Under Art. III, § 45 of the Missouri Constitution) in the Petition. Count I (Violation of the Timing Requirement for Congressional Redistricting Under Art. III, § 45 of the Missouri Constitution) of

Plaintiffs' Petition was stayed pending a decision in *Luther v. Hoskins*, SC101412, which is pending at the Missouri Supreme Court and raises the same claim as Count I in Plaintiff's Petition. No evidence was presented or arguments made to the circuit court related to Count I. On March 16, 2026, Count I of Plaintiffs' Petition was dismissed. All claims in the underlying case have been fully resolved.

This case involves the validity of a statute and falls within the exclusive appellate jurisdiction of the Missouri Supreme Court.

Dated: March 19, 2026

Respectfully submitted,

/s/ Kristin M. Mulvey

Kristin M. Mulvey, MO #76060  
Jonathan D. Schmid, MO #74360  
**ACLU OF MISSOURI FOUNDATION**  
906 Olive Street, Suite 1130  
St. Louis, MO 63101  
Telephone: (314) 652-3114  
kmulvey@aclu-mo.org  
jschmid@aclu-mo.org

Gillian R. Wilcox, MO #61278  
Jason Orr, MO #56607  
**ACLU OF MISSOURI FOUNDATION**  
406 W. 34th Street, Suite 420  
Kansas City, MO 64111  
Telephone: (816) 470-9938  
gwilcox@aclu-mo.org  
jorr@aclu-mo.org

Mark P. Gaber\*  
Aseem Mulji\*  
Simone Leeper\*  
Benjamin Phillips\*  
Isaac DeSanto\*  
**CAMPAIGN LEGAL CENTER**  
1101 14th St NW Suite 400  
Washington, DC 20005  
Telephone: (202) 736-2200  
mgaber@campaignlegalcenter.org  
amulji@campaignlegalcenter.org  
sleeper@campaignlegalcenter.org  
bphillips@campaignlegalcenter.org  
idesanto@campaignlegalcenter.org

Annabelle Harless\*  
**CAMPAIGN LEGAL CENTER**  
55 W. Monroe St., Ste. 1925  
Chicago, IL 60603  
Telephone: (202) 736-2200  
aharless@campaignlegalcenter.org

\*Admitted pro hac vice in the circuit court

Ming Cheung\*  
Dayton Campbell-Harris\*  
Sophia Lin Lakin\*  
**ACLU FOUNDATION**  
125 Broad Street, 18th Floor



Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

**CERTIFICATE OF SERVICE**

Not an Official Court Document Not an Official Court Document Not an Official Court Document

I hereby certify that on March 19, 2026, the foregoing was filed through the Court's electronic filing system to be served electronically on all counsel of record.

Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

/s/ Kristin M. Mulvey

al Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

an Official Court Document Not an Official Court Document Not an Official Court Document

nt Not an Official Court Document Not an Official Court Document Not an Official Court Document

t Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

cial Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

ot an Official Court Document Not an Official Court Document Not an Official Court Document

ent Not an Official Court Document Not an Official Court Document Not an Official Court Document

ut Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

icial Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

ot an Official Court Document Not an Official Court Document Not an Official Court Document

ment Not an Official Court Document Not an Official Court Document Not an Official Court Document

urt Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

fficial Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

Not an Official Court Document Not an Official Court Document Not an Official Court Document

