IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

MISSOURI PROTECTION & ADVOCACY SERVICES, VOZKC, Susana Elizarraraz, Manuel Rey Abarca IV, and Barbara Sheinbein;	)	
Plaintiffs,	)	
v.	)	Case No. 2:22-cv-04097-RK
DENNY HOSKINS, in his official capacity as the Missouri Secretary of State; Kansas City Board of Election Commissioners; St. Louis County Board of Elections; and Boone County Clerk;	)	
Defendants.	)	

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JOINT MOTION TO LIFT THE STAY ON ALL PROCEEDINGS

Plaintiffs Missouri Protection & Advocacy Services, VozKC, Susana Elizarraraz, Manuel Rey Abarca IV, and Barbara Sheinbein ("Plaintiffs") and Defendants Denny Hoskins, Kansas City Board of Election Commissioners, St. Louis County Board of Elections, and Boone County Clerk ("Defendants") (collectively, the "Parties"), by and through their respective counsel of record, hereby jointly move the Court to lift the stay on all proceedings in the above-titled case, and state the following in support of the Motion:

1. On June 22, 2022, Plaintiffs filed a Complaint for Declaratory and Injunctive Relief regarding enforcement of voter assistance provisions of the federal Voting Rights Act of 1965, 52 U.S.C. § 10508 (VRA). *See* Doc. 1.

2. On October 24, 2022, in response to this Court's order directing the Parties to brief whether this case should be stayed, *see* Doc. 50, Plaintiffs and Defendants separately submitted motions to stay the proceedings. *See* Docs. 51-52. The Parties anticipated that the Eighth Circuit's opinion in

Arkansas United v. Thurston, a case with issues similar to this case, would provide guidance on the best way to proceed with this litigation, including what would constitute relevant discovery, the appropriate legal standards governing the challenged law, and party standing issues.

3. On October 25, 2022, this Court ordered that the pending action be "stayed until the Eighth Circuit render[ed] its decision in *Arkansas United*[.]" *See* Doc. 53. This matter has been stayed since that time. The Parties have kept the Court advised through status reports filed on May 23, 2024; July 31, 2025, November 3, 2025; and February 3, 2026. *See* Docs. 68, 84, 90, 94. In the July 31, 2025 status report, the Parties further flagged *Turtle Mountain*, and Plaintiffs stated that they were considering amending the complaint. *See* Doc. 84. In the most recent status report, dated February 3, 2026, the Parties requested a continuance of the stay pending the Supreme Court's decisions regarding the petitions for writ of certiorari in *Arkansas United* and *Turtle Mountain*. *See* Doc. 94.

4. The Parties agree that good cause exists to lift the stay because the relevant issues in *Turtle Mountain* and *Arkansas United* have now been resolved. On May 18, 2026, the U.S. Supreme Court vacated the judgment in *Turtle Mountain* and remanded, and on June 22, 2026, denied certiorari in *Arkansas United*. *See Turtle Mountain Band v. Howe*, 2026 WL 1377069 (May 18, 2026); *see also Arkansas United v. Thurston*, 2026 WL 1780164 (June 22, 2026).

5. In light of the U.S. Supreme Court's decision to vacate the judgment in *Turtle Mountain*, and notwithstanding the ongoing stay, Plaintiffs intend to file a motion for leave to amend the complaint. The Parties agree that Defendants may file new responsive pleadings—either an answer or a motion to dismiss—should the Court grant Plaintiffs' motion for leave to amend the complaint.

WHEREFORE, for the foregoing reasons and good cause shown, the Parties agree that there is no reason for further delay and respectfully request that the stay be lifted. The Parties

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further respectfully request that the Court grant Plaintiffs permission to file their motion for leave to amend the complaint on or before November 24, 2026.

Respectfully submitted,

/s/ Kristin M. Mulvey

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CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2026, a copy of the foregoing was filed electronically and served on all counsel of record by operation of the CM/ECF system.

/s/ Kristin M. Mulvey
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