

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

ELIZABETH HEALEY, *et al.*,

Plaintiffs v.

STATE OF MISSOURI, *et al.*,

Defendants.

Case No. 2516-CV31273

Division 8

**NOTICE OF FILING REGARDING MOTION TO TRANSFER  
CASE NO. 2516-CV31273 FOR PURPOSES OF HEARINGS AND TRIAL**

Plaintiffs file this notice to alert the Court of the filing of a motion in *Wise v. Missouri*, No. 2516-CV29597, to transfer this case to Division 15 pursuant to Missouri Supreme Court Rule 66.01(b) and Local Rule 6.8(3), so that it may be joined with *Wise* for the purposes of any hearings or trials, including most immediately for a combined preliminary injunction hearing and trial on the merits on Count I of both case petitions. Plaintiffs state as follows:

1. The *Wise* and *Healey* Plaintiffs have each challenged the congressional map enacted by House Bill 1 (“HB 1”) as unconstitutional. The *Wise* Plaintiffs filed a lawsuit on September 12, 2025. *See* Case No. 2516-CV29597. The *Healey* Plaintiffs filed this lawsuit on September 28, 2025, the day that Governor Kehoe signed HB 1.

2. Plaintiffs in both cases have moved for a preliminary injunction on their claim that HB 1 violates Article III, Section 45 of the Missouri Constitution’s prohibition on mid-decade congressional redistricting (“Count I”), which is a pure legal issue. Plaintiffs have also requested that the trial on the merits of Count I be separated from the other claims and advanced and consolidated with the preliminary injunction hearing in order to obtain a final judgment on Count I. Plaintiffs’ preliminary injunction motions further contend they will suffer irreparable harm if

they are forced to vote in new districts drawn in violation of Missouri law, and that absent an injunction, Defendants—including Jackson County and Kansas City local election authorities—will have to implement the unlawful map ahead of congressional candidate filing deadlines in February 2026. *See* § 115.349(2), RSMo. The urgency of this matter, and its ability to be resolved expeditiously, is further demonstrated by the fact that parties before the Cole County Circuit Court have agreed to set a bench trial for November 12, 2025, to resolve a similar legal claim that separate plaintiffs brought against the Missouri Secretary of State. *See Luther v. Hoskins*, No. 25AC-CC06964.

3. On October 3, 2025, the *Wise* and *Healey* Plaintiffs filed a joint consent motion to transfer this case, No. 2516-CV31273, to Division 15, because the *Wise* case was the first filed case in Jackson County and because both cases arise out of the same transaction and involve common questions of law and fact. *See* Local Rule 6.8(3) (“Whenever there are two or more cases arising out of the same transaction . . . the circuit judge handling the lowest numbered case upon motion shall request the judge or judges having the later filed case or cases to transfer the same to the division of such requesting judge so that said judge shall dispose of all preliminary motions and try, hear and determine all issues presented in the case.”); Rule 66.01(b) (“When civil actions involving a common question of law or fact are pending before the court, it may order a joint hearing or trial of any or all the matters in issue in the civil actions . . . and it may make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay.”).

4. The motion to transfer filed in Case No. 2516-CV29597 is attached herein as Exhibit 1. All Defendants consented to the request for transfer. *See* Exhibit 1 at 2.

Dated: October 16, 2025

/s/ J. Andrew Hirth  
J. Andrew Hirth, #57807  
**TGH LITIGATION LLC**  
28 N. 8th St., Suite 200  
Columbia, MO 65201  
Telephone: (573) 256-2850  
andy@tghlitigation.com

Abha Khanna\*  
**ELIAS LAW GROUP LLP**  
1700 Seventh Avenue, Suite 2100  
Seattle, WA 98101  
(206) 656-0177  
akhanna@elias.law

Harleen Kaur Gambhir\*  
Tina Meng Morrison\*  
Julianna D. Astarita\*

**ELIAS LAW GROUP LLP**  
250 Massachusetts Ave. NW, Suite 400  
Washington, D.C. 20001  
Telephone: 202-968-4490  
hgambhir@elias.law  
tmengmorrison@elias.law  
jastarita@elias.law

*Attorneys for Healey Plaintiffs*

*\*Admission pro hac vice granted in Case No.  
2516-CV31273*