

**IN THE CIRCUIT COURT OF JACKSON COUNTY  
STATE OF MISSOURI**

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

**DEFENDANTS' MOTION TO DISMISS**

Pursuant to Rules 55.27(a)(1) and (a)(9), Defendants—the State and Secretary of State Denny Hoskins (State Defendants)—respectfully move for this Court to dismiss each claim in Plaintiffs' Petition. In the alternative, pursuant to Rule 51.045(a), State Defendants respectfully moves for this Court to transfer each claim in Plaintiffs' Petition to Cole County.

October 17, 2025

Respectfully submitted,

**CATHERINE L. HANAWAY**  
Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on the October 17, 2025 the foregoing Motion was filed electronically through the Court's electronic filing system and thereby served electronically on counsel for all parties.

/s/ Louis J. Capozzi, III

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