

**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

**RESPONSE OF DEFENDANTS JACKSON COUNTY BOARD OF ELECTION
COMMISSIONERS, MICHAEL K. WHITEHEAD, HENRY R. CARNER, COLLEEN M.
SCOTT, LYLE K. QUERRY, TAMMY BROWN AND SARA ZORICH TO PLAINTIFFS'
PETITION FOR INJUNCTIVE AND DECLARATORY RELIEF**

COMES NOW Defendants Jackson County Board of Election Commissioners, Michael K. Whitehead, Henry R. Carner, Colleen M. Scott, Lyle K. Querry, Tammy Brown and Sara Zorich by and thorough counsel, J. D. Williamson, Jr. and Bradley A. Constance, and for their Response to Plaintiffs' Petition for Injunctive and Declaratory Relief state as follows:

Defendant Jackson County Board of Election Commissioners is the body, pursuant to Sections 115.021 and 115.023 RSMo, charged with conducting all public elections in that portion of Jackson County, Missouri lying outside the city limits of Kansas City, Missouri; Defendants Michael K. Whitehead, Henry R. Carner, Colleen M. Scott and Lyle K. Querry are the duly appointed commissioners of the Jackson County Board of Election Commissioners; Tammy Brown and Sara Zorich are employees of the Jackson County Board of Election Commissioners and currently serve as Directors.

These Defendants have no authority to establish Congressional Districts and take no position with respect to the current effort to redraw the Congressional Districts of the State of Missouri.

These Defendants have not been asked by the State of Missouri to implement H.B.1.

Respectfully submitted,

/s/ J. D. Williamson

J. D. Williamson #18962

1001 S.W. 7 Hwy.

Blue Springs, MO 64014

Telephone 816-898-4808

jdwilliamson@comcast.net

/s/ Bradley A. Constance

Bradley A. Constance #28670

501 West Lexington Avenue

Independence, MO 64050

Telephone 816-833-1800

Facsimile 816-833-1805

bconstance@sccmlaw.com

ATTORNEYS FOR JACKSON BOARD OF
ELECTION COMMISSIONERS, MICHAEL K.
WHITEHEAD, HENRY R. CARNER, COLLEEN
M. SCOTT, LYLE K. QUERRY, TAMMY
BROWN AND SARA ZORICH

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of October, 2025, I electronically filed the foregoing with the clerk of the court using the e-filing system which sent notification of such filing to counsel of record.

/s/Bradley A. Constance

Bradley A. Constance