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IN THE MISSOURI SUPREME COURT

**NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF
COLORED PEOPLE
MISSOURI STATE CONFERENCE,
PATRICIA A. JONES
TRACI L. WILSON-KLEEKAMP**

Relator,

v.

Case No. SC101541

**GOVERNOR MIKE KEHOE, ET AL.,
Respondent**

MOTION TO EXPEDITE APPELLATE PROCEEDINGS

Appellants NAACP Missouri State Conference, Patricia A. Jones, and Traci L. Wilson-Kleekamp move this Court for an Order expediting all proceedings in this appeal, including resolution of the merits. In support, Movants state:

1. This matter involves Appellants' challenge to the constitutionality of the extraordinary session of the Missouri General Assembly convened pursuant to Governor Michael Kehoe's Proclamation of August 29, 2025.
2. On December 15, 2025, this Court held a bench trial on stipulated facts where Plaintiffs, Defendant, and Intervenor presented legal arguments to the Court on the claim in Plaintiffs' Petition.

3. After considering the Parties' briefs, arguments, and stipulations, this Court entered its final judgment on February 13, 2026, denying Plaintiffs' claim.
4. Thereafter on March 2, 2026 Appellants filed a notice of appeal.
5. On March 5, 2026, pursuant to Rule 81.045, Appellants filed a Motion to Shorten Time for the judgment to be made final.
6. On March 11, 2026, the trial court granted the motion and deemed the judgment to be final under Rule 81.045.
7. The Court may expedite briefing. *Am. Civil Liberties Union of Mo. v. Ashcroft*, 577 S.W.3d 881, 886–87 (Mo. Ct. App. 2019).
8. This case involves legislation adopted by the General Assembly on September 12, 2025 governing which districts will be in place for the 2026 congressional election (HB1 2025-2) and placing a Constitutional Amendment on the November 2026 general election ballot (HJR3 2025-2).
9. Ballots must be ordered for printing on or before June 9, 2026. A resolution to this case prior to that deadline would provide certainty to all parties involved in this matter, as well as the general voting public, election officials, and candidates intending to file for Congress.
10. There are currently multiple other suits pending in the lower courts related to HB1 2025-2 and one case pending in federal court¹. These suits do not

¹ *Healey et al., v. State*, No. 2516-CV31273 (Jackson Cnty. 2025); *Wise et al., v. State*, No. 2516-CV29597 (Jackson Cnty. 2025); *People Not Politicians v. Hoskins*, No. 25AC-CC07128 (Cole Cnty. 2025); *People Not Politicians v. Hoskins*, No. 25AC-CC08724 (Cole Cnty. 2025); *Maggard et al., v. State*, No. 25AC-CC09120 (Cole Cnty. 2025). There is also

deal with the same questions at issue in this case, but if successful, this appeal would mean the legislation at issue in those cases is no longer valid.

11. No party will be prejudiced by an expedited schedule and resolution. The issues here are purely legal and the record below was created on stipulated facts and exhibits.

12. Movants respectfully request that the Court adopt a briefing and submission schedule reflecting the need to resolve this matter prior to the ballot printing deadline of June 9, 2026. To that end Movants suggest that Appellants file their brief on April 10, 2026; Respondents file their briefs on May 1, 2026 and Appellants file their reply brief on May 18, 2026.

WHEREFORE, Movants respectfully request this Court enter its order expediting appellate proceedings in this matter, adopting an expedited briefing and submission schedule in the Court's final resolution timeline, and for such other relief as the Court deems proper.

Respectfully submitted,

/s/ Nimrod T. Chapel, Jr.

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a writ proceeding related to Case No. 25AC-CC07128. *See State ex rel. People Not Politicians v. Limbaugh*, No. WD88522 (Mo. App. W.D. 2025); *Missouri General Assembly, et al., v. von Glahn, et al.*, No. 4:25- cv-01535 (E.D. Mo. Dec. 8, 2025).

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CERTIFICATE OF SERVICE

I hereby affirm on this 27th day of March 2026, I filed true and accurate copies of the foregoing, along with all the exhibits filed with this document, went to each party or their counsel of record by Electronic Mail at:

/s/ Nimrod T. Chapel, Jr.

