

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

MISSOURI GENERAL ASSEMBLY, ET AL.,

*Plaintiffs,*

v.

Case No.

RICHARD VON GLAHN, ET AL.,

*Defendants.*

**MOTION FOR A PRELIMINARY INJUNCTION**

Plaintiffs, the Missouri General Assembly, Derry Hoskins in his official capacity as Missouri Secretary of State, and the State of Missouri, respectfully move this Court for a preliminary injunction under Federal Rule of Civil Procedure 65, prohibiting Defendants Richard von Glahn and People Not Politicians from submitting a petition for referendum on the General Assembly's recent congressional redistricting to the Missouri Secretary of State. For the reasons explained in the accompanying memorandum in support of this motion, the Court should issue the preliminary injunction against Defendants.

To prevent irreparable harm to Plaintiffs' interests, Plaintiffs respectfully request that this Court set an expedited briefing and hearing schedule and issue a preliminary injunction no later than November 15, 2025.

Dated: October 15, 2025

Respectfully submitted,

**CATHERINE L. HANAWAY**

ATTORNEY GENERAL

*s/ Louis J. Capozzi III*

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**CERTIFICATE OF SERVICE AND COMPLIANCE**

I hereby certify that true and correct copies of this Motion for Preliminary Injunction and accompanying papers shall be served along with the Complaint in accordance with Federal Rule of Civil Procedure 4. I further certify that the foregoing document contains 117 words, exclusive of matters designated for omission.

s/ Louis J. Capozzi III

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