

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

MISSOURI GENERAL ASSEMBLY, ET AL.,

*Plaintiffs,*

v.

RICHARD VON GLAHN, ET AL.,

*Defendants.*

Case No. 4:25-cv-01535-ZMB

**STATE OF MISSOURI'S  
MOTION FOR SANCTIONS AGAINST DEFENDANTS' COUNSEL**

Plaintiffs, the Missouri General Assembly, Denny Hoskins in his official capacity as Missouri Secretary of State, and the State of Missouri, respectfully move this Court to sanction Defendants' counsel—Ms. Amunson and Mr. Hatfield—for breaching their duty of candor to this Court pursuant to its inherent authority. For the reasons explained in the accompanying memorandum in support of this motion, Missouri respectfully requests this Court impose appropriate sanctions on Defendants' counsel, including admonishing Defendants' counsel, vacating the Court's dismissal order, reopening the case, striking Defendants' motion to dismiss, and any other sanction this Court deems warranted in its sound discretion.

Dated: December 12, 2025

Respectfully submitted,

**CATHERINE L. HANAWAY**  
ATTORNEY GENERAL

*s/ Louis J. Capozzi III*

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*Solicitor General*

William James Seidleck, #77794(MO)  
*Principal Deputy Solicitor General*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2025 the foregoing was filed electronically through the Court's electronic filing system to be served electronically on counsel for all parties.

*s/ Louis J. Capozzi III*