

**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 TO ALTER THE JUDGMENT**

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 alter its December 8, 2025 judgment (ECF 39) pursuant to Federal Rule of Civil Procedure 59. For the reasons explained in the accompanying memorandum in support of this motion, Missouri respectfully requests this Court alter its judgment, specifically for this Court to vacate its judgment based on Defendants' counsels' potential ethical lapses, *see* ECF 41-1, and based on state court cases illustrating Missouri faced and is facing a legally cognizable harm. At a minimum, this Court should hold this case in abeyance to see if this harm materializes and vacate the alternative *Pullman* holding based on the State lacking an available state law remedy.

Dated: January 5, 2026

Respectfully submitted,

CATHERINE L. HANAWAY
ATTORNEY GENERAL

/s/ Louis J. Capozzi III

Louis J. Capozzi III, #77756(MO)

Solicitor General

William James Seidleck, #77794(MO)

Principal Deputy Solicitor General

Graham Miller, #77656(MO)

Deputy Solicitor General

OFFICE OF THE ATTORNEY GENERAL

Old Post Office Building

815 Olive Street, Suite 200

St. Louis, MO 63101

Phone: (573) 645-9662

Louis.Capozzi@ago.mo.gov

William.Seidleck@ago.mo.gov

Graham.Miller@ago.mo.gov

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2026 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