

**IN THE CIRCUIT COURT OF JACKSON COUNTY,  
MISSOURI, AT KANSAS CITY**

COMPREHENSIVE HEALTH OF  
PLANNED PARENTHOOD GREAT  
PLAINS, PLANNED PARENTHOOD  
GREAT RIVERS-MISSOURI

Plaintiffs,

v.

THE STATE OF MISSOURI, et al.

Defendants,

No. \_\_\_\_\_

**PLAINTIFFS' MOTION TO CERTIFY A DEFENDANT CLASS**

Come now Plaintiffs, pursuant to Missouri Supreme Court Rule 52.08, and move this Court to certify a Defendant Class of all Missouri Prosecuting Attorneys and appoint the Jackson County Prosecuting Attorney, Jean Peters Baker, in her official capacity, as representative of the Defendant Class.

As described in the Suggestions in Support, the Challenged Restrictions carry criminal penalties, empower Missouri Prosecuting Attorneys to bring an action for injunctive relief, and are alleged to be unconstitutional by Plaintiffs. Missouri's 115 County Prosecutors are charged with enforcement of the Challenged Restrictions. Certification of a Defendant Class of all Missouri Prosecuting Attorneys is appropriate in this case because the Proposed Class meets the requirements of the Missouri Supreme Court Rule

52.08(b)(1)(A), (b)(2), and (b)(3), and Defendant Baker is an appropriate class representative.

WHEREFORE, Plaintiffs request this Court:

- A. Grant Plaintiffs' Motion and Certify a Defendant Class of all Missouri Prosecuting Attorneys;
- B. Appoint the Jackson County Prosecuting Attorney, Jean Peters Baker, in her official capacity, as representative of the Defendant Class; and
- C. Allow Plaintiffs such other and further relief as this Court deems just and equitable.

Respectfully submitted,

/s/ Gillian Wilcox

GILLIAN R. WILCOX, #61278

JASON ORR, #56607

**ACLU of Missouri Foundation**

406 West 34th Street, Ste. 420

Kansas City, MO 64111

Phone: (816) 470-9938

gwilcox@aclu-mo.org

jorr@aclu-mo.org

KRISTIN M. MULVEY, #76060

JONATHAN D. SCHMID, #74360

TORI M. SCHAFER, #74359

**ACLU of Missouri Foundation**

906 Olive Street, Suite 1130

St. Louis, Missouri 63101

Phone: (314) 652-3114

kmulvey@aclu-mo.org

jschmid@aclu-mo.org

tschafer@aclu-mo.org

ELLA SPOTTSWOOD\*

CAMILA VEGA\*

**Planned Parenthood Federation  
of America**

123 William Street, 9th Floor

New York, NY 10038

Phone: (212) 541-7800

ella.spottswood@ppfa.org

camila.vega@ppfa.org

CHELSEA TEJADA\*

**ACLU Foundation**

125 Broad Street, Floor 18

New York, NY 10004

Phone: (212) 549-2633

ctejada@aclu.org

*Attorneys for All Plaintiffs*

ERIN THOMPSON\*

**Comprehensive Health of Planned  
Parenthood Great Plains**

4401 West 109th Street, Suite 200

Overland Park, KS 66211

Phone: (913) 345-4617

*Attorney for Comprehensive Health of  
Planned Parenthood Great Plains*

RICHARD MUNIZ, #74282

**Planned Parenthood Great Rivers–  
Missouri**

4251 Forest Park Avenue,

St. Louis, MO 63108

Phone: (314) 828-1804

*Attorney for Planned Parenthood Great  
Rivers–Missouri*

\* *pro hac vice* application forthcoming