



**CIVIL PROCEDURE FORM NO. 8-A(2)**

**IN THE 19TH JUDICIAL CIRCUIT, COLE COUNTY, MISSOURI**

Judge or Division: DANIEL R. GREEN	<b>Circuit Court Case Number:</b> 25AC-CC05427	
Plaintiff/Petitioner:  ANNA FITZ-JAMES	Appellate Number:	<input type="checkbox"/> Filing as an Indigent
	Date of Judgment/Decree/Order: (ATTACH A COPY) OCTOBER 10, 2025	Court Reporter:
Defendant/Respondent: DENNY HOSKINS; CINDY O'LAUGHLIN; JONATHON PATTERSON; ED LEWIS	Date Post Trial Motion Filed: OCTOBER 9, 2025	<input type="checkbox"/> Sound Recording Equipment
	Date Ruled Upon: OCTOBER 10, 2025	The Record on Appeal will consist of: ___ Legal File only or <input checked="" type="checkbox"/> Legal File and Transcript

(Date File Stamp)

**Notice of Appeal to Missouri Court of Appeals - Civil**

District:  Western  Eastern  Southern

Notice is given that ANNA FITZ-JAMES appeals from the judgment/decree/order entered in this action on \_\_\_\_\_ (date).

Appellant's Name (If multiple, list all or attach additional pages) ANNA FITZ-JAMES	Respondent's Name (If multiple, list all or attach additional pages) DENNY HOSKINS
Address 4466 W. PINE BLVD, APT. 24B ST. LOUIS, MO 63108	Address 600 WEST MAIN STREET JEFFERSON CITY, MO 65101
Appellant's Attorney/Bar Number (If multiple, list all or attach additional pages) CHARLES W. HATFIELD, NO. 40363	Respondent's Attorney/Bar Number (If multiple, list all or attach additional pages) LOUIS J. CAPOZZI III, NO. 77756 J. MICHAEL PATTON, NO. 76490 SAMUEL C. FREEDLUND, NO. 73707
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Brief Description of Case (May be completed on a separate page) Anna Fitz-James challenged House Joint Resolution 73— a proposed constitutional amendment repealing the recently approved Right to Reproductive Freedom Initiative. The Petition for Declaratory Judgment and Injunctive Relief included three claims: (1) HJR 73 contains multiple subjects and is unconstitutional; (2) HJR 73's summary statement is unfair and insufficient; and (3) HJR 73's fair ballot language is unfair and insufficient. Because this is a ballot title challenge, this litigation must be completed within 180 days of filing the petition. That date is December 29, 2025.	
Issues Expected To Be Raised On Appeal (May be completed on a separate page. Appellant is not bound by this list.) Appellant expects to raise the following issues on appeal (this is not an exclusive list): 1. The judgment is erroneous because HJR 73 contains multiple subjects and is unconstitutional; 2. The judgment is erroneous because the Secretary's Second Revised Summary Statement is unfair and insufficient; 3. The judgment is erroneous because the Secretary's Second Revised Fair Ballot Language is unfair and insufficient; and	

4. The judgment is erroneous because the circuit court should have rewritten the summary statement and fair ballot language rather than the Secretary.

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**Docket Fee Information**

- The docket fee in the amount of \$70.00 is being tendered with this notice of appeal.
- No docket fee is being tendered because:
  - a docket fee is not required by law pursuant to \_\_\_\_\_ (cite specific statute or other authority).
  - a motion to prosecute the appeal in forma pauperis has been or will be filed.
  - a docket fee in the amount of \$70.00 cannot be tendered at this time but will be submitted at a later date or this appeal will be subject to dismissal pursuant to Rule 84.08(a).

Signature of Attorney or Appellant  
/S/ ALIXANDRA S. COSSETTE

Date

**Certificate of Service on Persons other than Registered Users of the Missouri eFiling System**

I certify that on \_\_\_\_\_ (date), a copy of the foregoing was sent to the following by facsimile, hand-delivery, electronic mail or U.S. mail postage prepaid to their last known addresses.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Appellant or Attorney for Appellant

**Directions to Clerk**

Transmit a copy of the notice of appeal and all attached documents to the clerk of the Court of Appeals and to any person other than registered users of the eFiling system in a manner prescribed by Rule 43.01. Clerk shall then fill in the memorandum below. See Rule 81.08(i). Forward the docket fee to the Department of Revenue as required by statute.

**Memorandum of the Clerk**

I have this day served a copy of this notice by  regular mail  registered mail  certified mail  facsimile transmission to each of the following persons at the address stated below. If served by facsimile, include the time and date of transmission and the telephone number to which the document was transmitted.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I have transmitted a copy of the notice of appeal to the clerk of the Court of Appeals, Western District.

- Docket fee in the amount of \$70.00 was received by this clerk on 10/14/2025 (date) which will be disbursed as required by statute.
- No docket fee was received.

10/14/2025  
Date

Candace Schwartz  
Clerk

Additional Parties and Attorneys

List every party involved in the case not listed on page 1, indicate the position of the party in the circuit court (e.g. plaintiff, defendant, intervenor) and in the Court of Appeals (e.g. appellant or respondent) and the name of the attorney of record, if any, for each party. Attach additional pages to identify all parties and attorneys if necessary.

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