

**IN THE CIRCUIT COURT
FOR COLE COUNTY, STATE OF MISSOURI
19TH JUDICIAL CIRCUIT**

THOMAS HOOTSELLE, JR., et al., and)
MISSOURI CORRECTIONS OFFICERS)
ASSOCIATION,)
)
Plaintiffs, Individually and on)
behalf of all others similarly situated,)
)
v.)
)
MISSOURI DEPARTMENT OF)
CORRECTIONS,)
)
Defendant.)

Cause No. 12AC-CC00518

Div. 4

PLAINTIFFS’ MOTION FOR PARTIAL SUMMARY JUDGMENT

COME NOW Class Plaintiffs and Class Representatives, Thomas Hootselle, Daniel Dicus, and Oliver Huff (“Class Plaintiffs”), and Plaintiff, Missouri Corrections Officers Association (“MOCOA”) (collectively “Plaintiffs”), and hereby Move for Partial Summary Judgment pursuant to Rule 74.04 of the Missouri rules of Civil Procedure. The grounds for Partial Summary Judgment for Plaintiffs are set for the in the Statement of Uncontroverted Material Facts and Memorandum in Support of Partial Summary Judgment filed contemporaneously herewith.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was filed and served via the Missouri Court e-filing system and served on counsel of record for Defendant thereby as follows on June 15, 2018 to:

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