

**IN THE CIRCUIT COURT FOR THE CITY OF ST. LOUIS
STATE OF MISSOURI**

STATE OF MISSOURI,)	
)	
Plaintiff,)	
v.)	No. 1422-CC09027
)	
SHARON QUIGLEY CARPENTER,)	
Recorder of Deeds and Vital Records)	
Registrar, City of St. Louis,)	
)	
Defendant.)	

**MOTION FOR JUDGMENT
ON THE PLEADINGS**

Plaintiff State of Missouri, through counsel, the Missouri Attorney General in his official capacity, moves this Court for judgment on the pleadings, and states in support as follows:

1. Defendant has answered Plaintiff's petition, and Plaintiff has answered Defendant's counterclaim.
2. "Judgment on the pleadings is appropriate where the question before the court is strictly one of law." *Eaton v. Mallinckrodt, Inc.*, 224 S.W.3d 596, 599–600 (Mo. banc 2007).
3. As set forth in the accompanying suggestions in support, incorporated herein by this reference, the State of Missouri is entitled to judgment as a matter of law.

Wherefore, the State of Missouri requests this Court grant judgment on the pleadings and all other relief the Court deems appropriate.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF
STATE OF MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically via Missouri CaseNet e-filing system this 5th day of August, 2014, to:

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