

**IN THE MISSOURI COURT OF APPEALS
EASTERN DISTRICT OF MISSOURI**

STATE ex rel.)	
MATTHEW R. GRANT,)	
)	
<i>Relator,</i>)	EDMO Case No.
)	
vs.)	Cause No. 2012SL-DR03959-02
)	
The HONORABLE BRUCE HILTON,)	
Presiding Judge of the Circuit Court)	
of the County of St. Louis,)	
21 st Judicial Circuit, Division 13,)	
)	
<i>Respondent.</i>)	

**URGENT PETITION FOR PRELIMINARY AND PERMANENT
WRITS OF PROHIBITION, OR IN THE ALTERNATIVE,
PRELIMINARY AND PERMANENT WRITS OF MANDAMUS,
BOTH RELATING TO JUDICIAL CORRUPTION THE 21ST
CIRCUIT COURT OF THE STATE OF MISSOURI, FOR A
WRIT IN PROHIBITION AND/OR MANDAMUS REVERSING THE
CIRCUIT COURT’S ORDER DENYING MOTION TO PARTIALLY
UNSEAL THE COURT RECORD, AND GRANTING THAT
MOTION, AND SEPARATE MOTION TO PARTIALLY UNSEAL
THE RECORD OF THESE PROCEEDINGS**

COMES NOW, Relator Matthew R. Grant (“Relator”), pursuant to Rules 84.24(e) & (i), 94 and 97, and petitions this Court to issue Preliminary and Permanent Writs of Prohibition and/or Mandamus, removing the 21st Circuit Presiding Judge, Bruce F. Hilton’s (“Respondent,” “Presiding Judge Hilton,” or “Judge Hilton”) from this case, and/or for reversal of various orders that were entered without subject matter jurisdiction and in violation of *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979), and *Elnick v. Caracci*, 255 S.W.3d 692 (Mo. App. E.D. 2008).

Simply stated, Relator presents a mountain of *objective* evidence to support a finding by this Court, as a matter of law, that Judge Hilton must be disqualified as the trial judge in this matter.

Further, Relator requests Writs of Prohibition and/or Mandamus vacating Judge Hilton's denial of his Motion to Partially Unseal the REDACTED *trial court* record in this matter, and he seeks an Order granting the unsealing of the REDACTED records at the trial court level as proposed by Relator in the Motion denied by Judge Hilton without jurisdiction to take any action.

By separate Motion, Relator seeks similar relief regarding the court records in these appellate court Writ proceedings. Relator requests that the public be provided access to the filings and REDACTED exhibits only.¹ Relator presents this request so that Missouri's citizens can every aspect of Relator's ongoing battle to protect his children and end the corruption that persists in the 21st Circuit Courthouse.

There is nothing to hide, so there is no need to hide it. The uncomfortable truth is no reason to deny the public their constitutionally guaranteed and presumptive right to public access.

A. PRESIDING JUDGE HILTON'S ONGOING CORRUPTION, BIAS, AND REFUSAL TO FOLLOW THE MANDATORY PRECEDENT OF THE MISSOURI SUPREME COURT IN *MATTER OF BUFORD*, 577 S.W.2D 809 (MO. BANC 1979), AND THIS COURT IN *ELNICK V. CARACCI*, 255 S.W.3D 692 (MO. APP. E.D. 2008) PROVES THAT HE MUST BE REMOVED AS THE TRIAL COURT JUDGE IN THIS MATTER.

Respondent has repeatedly advised Judge Hilton of the commonsense holdings of *Matter of Buford* and *Caracci*. Like Commissioner Greaves before him

¹ As a point of clarification. All Motions, other papers and Exhibits that Relator is filing with this Court on this date should be made available. All documents have been properly REDACTED consistent with the Court's Operating Rules.

in this case, Judge Hilton's continued disregard for their clear mandates is intentional and is yet another attempt to hide the corruption that resides in the 21st Circuit Court of the State of Missouri.

The *Honorable* Bruce F. Hilton simply thumbs his nose at the hierarchy within the courts of the State of Missouri and he thinks he can do as he pleases. He is, after all, the Presiding Judge of, in his own mind, the supposedly untouchable County of St. Louis, Missouri.² Subject matter jurisdiction means nothing to Judge Hilton, he thinks he can take it, grab it and hold it indefinitely, no matter what Missouri law actually mandates.

As discussed below, the litany of improper Orders entered by Judge Hilton had the effect of, among other things, denying appointed Senior Judge T. Lynn Brown, only now known to have been *actually* appointed by the Missouri Supreme Court back on March 4, 2025, the ability to rule on Relator's pending *New Evidence* Motion for Change of Judge for Cause, Relator's Rule 74.06(b) Motion to Set Aside the Order entered *in absentia* that is the only reason Judge Hilton is still assigned to this case, and ultimately the necessity of removing Judge Hilton as the trial judge in this matter.³


First and foremost, the Missouri Supreme entered an unprecedented Order in this case. The court, en banc, issued an Order that assigned retired Circuit Judge T.

² Respondent Judge Hilton believes he reports to no one. That belief is propped up by the corrupt arm of the Missouri Republican machine that Relator intends to dismantle, one part at a time.

³ It is the actions of Respondent Judge Hilton that led Relator to question the legitimacy of the Missouri Supreme Court's March 4, 2025 *sua sponte* Order that miraculously appeared on the trial court docket 23 days late and only after Relator's prior Petition for Writs in this matter. Fortunately, this need not dig into that issue and issue any rulings on that fact that Relator's confusion and excusable neglect in not believing the Order and relating hearing to be legitimate was the direct result of Judge Hilton's fraud upon his own court, if that is even an accurate concept. In reality, Relator has routinely suffered from fraud on the court by the court. Admittedly, this has never happened in this manner in the history of Missouri jurisprudence that Relator can locate through diligent research.

Lynn Brown to this case specifically. Importantly, the Order was entered *sua sponte*. The mere fact that the Order was entered after Relator has forwarded evidence of corruption to everyone he can think of, is proof that Relator's allegations are not some fanciful delusion.

This Court need look no further than the fact that Judge Hilton concealed the Missouri Supreme Court's Order appointing Senior Judge Brown for **23 days**:

<p>FILED</p> <p>MAR 04 2025</p> <p>JOAN M. GILMER CLERK, ST. LOUIS COUNTY March 4, 2025</p>	
<p>IN THE SUPREME COURT OF MISSOURI</p> <p>EN BANC</p>	
<p>Pursuant to the provisions of Section 26.3 of Article V of the Constitution of Missouri, it is ordered that</p> <p>THE FOLLOWING JUDICIAL PERSONNEL:</p> <p>THE HONORABLE T LYNN BROWN (35877)</p> <p>BE ASSIGNED AS A SENIOR JUDGE WITH CONSENT TO THE FOLLOWING COURT OR DISTRICT:</p> <p>21st JUDICIAL CIRCUIT (ST. LOUIS COUNTY)</p>	
<p>IN THE MATTER OF:</p> <p>MATTHEW R GRANT VS. C M G ET AL, CASE NO. 12SL-DR03989-02</p> <p>All to proceed in accord with the local Presiding Judges orders and those of the Supreme Court. This order is to include any judicial activity necessary to complete the assignment, including after-trial proceedings.</p>	
<p><i>Mary R. Russell</i></p> <p>Mary R. Russell, CHIEF JUSTICE</p>	
<p>STATE OF MISSOURI - SCT:</p> <p>I, Betsy Ledgenwood, Clerk of the Supreme Court of Missouri, do hereby certify that the foregoing is a true copy of the order of said court, entered on March 4, 2025 as fully as the same appears of record in my office.</p>	
<p>IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Supreme Court. Done at office in the city of Jefferson, State aforesaid, March 4, 2025.</p>	
	<p><i>Betsy Ledgenwood</i> Court Clerk</p> <p><i>Debra Feltz</i> D.C.</p>
<p>TN#: 63547</p>	<p>Exhibit 000</p>

Stunning. Absolutely stunning. This exhibit is all this Court needs to review to make short work of Relator's Petition for Writs as to Judge Hilton. He must be disqualified immediately.

But Hilton did not stop there.

Once Relator placed two Motions on file to make the issue of Judge Hilton's role as trial judge ripe for ruling, Judge Hilton denied them both.

That is correct. Judge Hilton *himself* ruled that *he* cannot be removed for cause. What a travesty of justice and an ongoing depravation of Due Process.

Similarly, Judge Hilton *himself* denied a Rule 74.06(b) Motion to Vacate that Relator filed and was directed to appointed *Senior Judge Brown* regarding *Senior Judge Brown's* April 2, 2025 Order entered *in absentia*.⁴ That is shocking as well.

What is happening is clear, Judge Hilton seeks to remain assigned as trial judge and control the docket in this matter at all costs as the vast corruption over which he presides has now been exposed outside of the 21st Circuit Court. In sum, Judge Hilton seeks to keep a lid on what he has done, for as long as he can.

Importantly, Relator urges non-recused Judges Hess and Judge Clayton to review the critical fact that Judge Hilton's prior actions led to the *concealment* of a Missouri Supreme Court Order dated March 4, 2025 for *23 days*, and that *concealment* made Relator's prior Writ proceedings before this Court, Case No. ED113446, and the Missouri Supreme Court, SC101040, likely *moot* before they were even filed.

The Missouri Supreme Court's March 4, 2025 Order is crucial to understand. It was entered *sua sponte* and presumably followed Relator's constant reporting of the corruption by the 21st Circuit's Presiding Judge, and within the St. Louis Family Court in this case to anyone and everyone. The Supreme Court Order effectively pulled a Democrat circuit judge out of retirement and assigned him to act as Senior Judge in just this case. It is unheard of. It has never happened, to Relator's knowledge. It was and is a watershed moment.

Relator respectfully suggests that the Missouri Supreme Court's March 4, 2025 Order is, indeed, the 'writing on the wall' for Judge Hilton and his co-

⁴ Relator's Motion to Vacate is part of the voluminous trial record presented with this Petition for Writs, and it explains, as does his Petition for Writs filed with the Missouri Supreme Court why he was absent in-person, *but available remotely*, from the April 2, 2025 hearing in this matter.

conspirators. Finally, the end of the blatant corruption in the 21st Circuit Courthouse has begun.

It because Judge Hilton knew what the March 4, 2025 Order meant, that he decided to conceal it from Relator. That is worth restating: The Presiding Judge of the 21st Circuit Court **failed** to publish a *sua sponte*, en banc, Order from the Missouri Supreme Court to the docket in this case until *after* Relator filed his prior Petition for Writs in this Court.

It is so amazingly disappointing that it is hard to imagine that it is true. It is so *difficult* to imagine that even Relator did not believe it at first as noted in his Writ filings in the Missouri Supreme Court, Case No. SC101040.

On May 21, 2025, Relator finally heard the expected excuse in Judge Hilton's Division 13 courtroom, it was simply a "clerical error." Sure. Surely, that is what happened.

The momentous Order from the Supreme Court that came down and will forever change the 21st Circuit Court of the State of Missouri was accidentally omitted from the Court docket. That is what Judge Hilton expects this Court to believe? No reasonable person believes that false excuse and for that reason alone, Judge Hilton must be removed due to an appearance of impropriety as a matter of law.

However, that is not nearly all these Writ filings present to this Court. Not only did Judge Hilton hide the Missouri Supreme Court's Order, when Relator exposed his and his co-conspirator's corruption to this Court, Judge Hilton, in collusion with the corrupt Guardian *Ad Litem* John Fenley, the corrupt Office of Chief Disciplinary Counsel Special Representative and counsel of record, Maia Brodie, and the respondent Rebecca A. Copeland struck fast and they struck hard to **punish** Relator for exposing what they all had done to this Court when he filed his Petition for Writs on March 26, 2025 in Case No. ED113446.

Judge Hilton knows what the inevitable end to the current charade will be in light of Relator's filings but also in light of the Missouri Supreme Court Order that

he kept hidden. And for that reason, on March 27, 2025, *less than 24 hours* after Relator filed his prior Petition for Writs with this Court, Judge Hilton entered an *ex parte* Temporary Restraining Order *terminating all of Relator's visitation and custody rights with his children*.

That is just one example of the costs that Relator has paid to expose the corruption in the 21st Circuit Courthouse that has persisted for way too long. Relator has endured much more that will become relevant later.

As discussed herein, Judge Hilton had no subject matter jurisdiction in this case on March 27, 2025 or on March 28, 2025 when he entered both TROs in this case. Judge Hilton was obligated to respect the hidden Order from the Missouri Supreme Court and allow appointed Senior Judge Brown to rule on Relator's February 27th and 28th Motions for Change of Judge. Instead, in addition to the invalid TROs and other Orders entered on March 28, 2025, Judge Hilton again ignored *Matter of Buford* and *Caracci* and entered even more invalid Orders on February 28, 2025, that are also each a nullity as a matter of law.

Judge Hilton has no explanation for his actions. He is nothing more than a wounded animal lashing out at the one person, a *pro se* Missouri licensed attorney, that has already succeeded at ending the long-running corrupt scheme which, like a virus, has used the 21st Circuit Courthouse as its host.

Relator will not relent or settle as Judge Hilton has demanded. Even now, Judge Hilton has colluded with his co-conspirators on a plan to strike Relator's pleadings on **June 2, 2025 at 1:00 p.m.** as even further retaliation. As explained in Relator's New Evidence Motion for Change of Judge for Cause, the proof of what is actually happening is everywhere and it is obvious. In order to shorten these pleadings, Relator notes that his New Evidence Motion is Exhibit 1 in this matter and it is the single best summary of evidence that Relator has prepared to date that details the corruption and actus bias in this matter. Relator begs this Court to read it thoroughly. It details the retaliation that now targets Relator's wife and was

contrived by respondent Rebecca A. Copeland and her false and defamatory call to the Wentzville and Town & Country Police.

Relator seeks *at least* a **stay** of all trial court proceedings so that Judge Hilton cannot enter even more improper Orders for Relator to bring before this Court in future Petitions for Writs. There is a hearing set on a Motion to Strike Relator's pleadings set for **June 2, 2025 @ 1:00 p.m.** If that hearing goes forward, Relator will right back before this Court on what will then be a 3rd Petition for Writs. The time to act is now.

In addition to the removal of Judge Hilton, Relator properly sought to unseal the REDACTED at the trial court level, so that the public can see the corruption that has taken place.⁵ However, Respondent Judge Hilton's issued a perfunctory denial of Relator's Motion to Partially Unseal the trial court record in this case

Importantly Relator seeks unsealing of only the parties' REDACTED filings and court entries such as orders, Judge Hilton's continued public secrecy of these documents serves his same goal of keeping the corruption over which he presides hidden from not only appellate review, but also, from the view of the public who has a constitutionally guaranteed right of access.

As discussed below, the Missouri Supreme Court and this Court have addressed the manner in which the dockets in these cases should be made accessible to the public.

Finally, and for the same reasons as detailed in Relator's trial court Motion, here, Relator asks that all briefing and REDACTED exhibits be made available to Missouri's citizens.

A. PRESIDING JUDGE HILTON'S ONGOING CORRUPTION, BIAS, AND REFUSAL TO FOLLOW THE MANDATORY PRECEDENT OF THE MISSOURI SUPREME COURT IN *MATTER OF BUFORD*, 577 S.W.2D 809 (MO. BANC 1979), AND THIS COURT IN *ELNICK V. CARACCI*, 255 S.W.3D 692 (MO. APP.

⁵ Relator is a source of the *redacted* pleadings but the public must have access via Missouri's CaseNet.

E.D. 2008) PROVES THAT HE MUST BE REMOVED AS THE TRIAL COURT JUDGE IN THIS MATTER.

Relator notes that this Court has the inherent power to largely dispense with the bulk of the issues raised in this Petition for Writs, based solely upon only a review of the one truly *dispositive issue* in this Petition for Writs proceeding – the undisputed fact that the Missouri Supreme Court’s March 4, 2025, *sua sponte* and en banc Order, that appointed *retired* Circuit Court Judge T. Lynn Brown to serve as Senior Judge specifically for this matter, was not revealed to Relator until 23 days after its receipt by the 21st Circuit Court, and *after* Relator filed his prior Emergency Petition for Writs in this Court, Case No. 113446.

That fact alone resolves whether this Court should find *as a matter of law* that not only should Judge Hilton’s denial of Petitioner’s *New Evidence* Motion to Change of Judge for Cause be vacated and set aside, but that undisputed fact should compel this Court to go one step further and find that the *New Evidence* Motion should be granted as a matter of law. This finding requires no investigation into intent or any explanations of what happened in the chambers of Respondent Presiding Judge Hilton, for **23 long days**, while the Missouri Supreme Court’s Order remained hidden from Relator’s view.

This Court should take note, however, that on May 21, 2025, Presiding Judge Hilton’s clerk unconvincingly and finally claimed that it was a “clerical error” and that was the sole cause of the concealment. Of course, that is what happened. Setting that falsity aside, there is no doubt as a matter of law every reasonable person would see the impropriety in Respondent Judge Hilton continuing to serve as the trial judge in this matter.⁶

⁶ While this is the low-hanging fruit, Relator hopes that this Court will go further and at some point address the overwhelming *bias* with which Judge Hilton has treated Relator as part of his involvement in the corruption in the 21st Circuit Court of the State of Missouri. Now is the time to begin to build a record for Missouri’s Citizens to review and see that an impartial court has found that Judge Hilton’s actions amounted to substantial and *intentional bias*. While no expert in appellate practice, it may be that the

It was and is absolutely shocking that the Order was entered *sua sponte*, so much so, that Relator and another third-party licensed attorney deemed it illegitimate. Regardless, what is even more incomprehensible is that Respondent Presiding Judge Hilton thought that he could *hide* the Missouri Supreme Court's March 4, 2025, Order from Relator, because it largely provided Relator what he sought from this Court in Case Number 113446 ("*Hilton IA*"), and from the Missouri Supreme Court in Case Number SC101040 ("*Hilton IB*").

As this Court should find particularly **appalling**, Respondent Judge Hilton's concealment of the March 4, 2025, Order, led Relator to file Petitions for Writs in this Court, and in the Missouri Supreme Court that were likely *moot* before they were placed on file. It is alarming. It was fraud upon both appellate courts.

Judge Hilton wasted this Court's valuable time while he, once again, violated Relator's Due Process rights, because he was on the verge of being further exposed for the corrupt criminal in a black robe that he is. Indeed, it is perplexing what Judge Hilton planned after he received after the Missouri Supreme Court's Order, but it surely was not a change in course towards fairness and justice. There was no end game but that is often the case with criminals facing the inevitable.

Judge Hilton has lost, the corruption over which he Presides is now exposed, and he continues to **punish** Relator to extract every pound of flesh that he can on his way down to personal and professional ruin. Judge Hilton issues order after order meant to further delay the inevitable in the hope that Relator will make a misstep that may allow Judge Hilton to escape the jaws of justice.

More specifically at issue in this Petition for Writs, through his intentional and wrongful orders, Respondent Judge Hilton is now attempting to place a temporary roadblock between Relator and appointed Senior Judge Brown, who was

permanent writ(s) that should be issued in this matter can address these more substantive issues. Relator hopes that this Court does not pass on this opportunity to address what happened to Relator's children and himself in this case. It has been a travesty and miscarriage of justice likely never before seen in the *civil* context in this state.

assigned to his role by the Missouri Supreme Court, as Judge Hilton knows the outcome of an impartial review of his conduct. Any fair review of Judge Hilton's corrupt actions in this case will result in the obvious finding that he, Commissioner Mary W. Greaves before him, Guardian *Ad Litem* John Fenley, OCDC Special Representative Mia Brodie, and Respondent Rebecca A. Copeland, are all knowing participants in a broad and complex corrupt enterprise that festers in the at least the St. Louis Family Court.⁷

On May 21, 2025, Respondent Judge Hilton, via his clerk Veronica Gipson, claimed that the ***most significant Order*** that the 21st Circuit has seen in more than 25 years, or longer, was supposedly mistakenly uploaded into the Court's internal docketing system but somehow *not* published to the actual court docket due to a "**clerical error.**"⁸ It would be laughable if were not such a serious violation of the Relator's Due Process rights and more evidence of the corruption conducted in the 21st Circuit courthouse.

More importantly, this undisputed fact *alone* creates an appearance of impropriety that forbids Judge Hilton from remaining assigned to this case. Missouri Code of Judicial Conduct's Rule 2-2.11's clear application in this matter is established as a matter of law.

⁷ As previously noted, Judge Hilton's former law partner Lawrence Gillespie and his law firm are members of the corrupt enterprise as well as revealed in his representation of a critical fact witness in this matter and his verbal admission to Relator that he "had no idea what he was involved in." Additionally, Relator's former counsel Mat G. Eilerts and C. Curran Coulter, their law firms, and the *many* others that Relator will later address, have also played their parts in the expansive corruption on full display in this case. The corruption Relator has exposed is vast.

⁸ Relator is hopeful that Judges Hess and Clayton now understand the view from which Relator previously observed this Court and it's ruling thereafter. Judge Hilton is as corrupt as the day is long and when he states there is corruption, Relator takes him at his word. Similarly, Relator is quite thankful that Judge Lay and Judge Gaertner saw the appearance of impropriety and previously recused, and presumably they will remain recused from addressing this matter as well. If necessary, Relator formally requests such recusals for the reasons previously noted in Case No. 113446.

Relator asks this Court to take judicial notice that after everything Relator has done to expose Judge Hilton and the corruption within which he now wallows, Judge Hilton, like a wounded animal, is now set to strike all of Relator's pleadings on June 2, 2025.

Moreover, as ridiculous as it sounds, corrupt Presiding Judge Hilton is set to serve as the trial judge for the trial in this matter currently set for June 23-24, 2025. The scenario caused by the ongoing corruption in this case is literally obscene.

For that reason, Relator asks this Court to issue an Order finding, as a matter of law, that Judge Hilton must be disqualified from continuing his ongoing, corrupt and flat-out evil rule over this case. However, such a ruling based upon impropriety is simply too narrow. Judge Hilton must also be disqualified due to the obvious *bias* to demonstrate to Missouri's citizens that even a *Republican* Presiding Judge can be held accountable for his corrupt actions in this Red State.

More importantly, Relator's *children* need *immediate action* and Relator pleads with this Court to provide it in the limited manner that it can, considering the appellate role in which this Court admittedly sits. Relator realizes that his next trial judge will be charged with the task of dismantling all of the suffering his children continue to endure, to the extent that can even be done. But, Relator presents this Court with an appellate, and partial remedy available now.

Because the April 4, 2025, Preliminary Injunction in this matter that completely took away Relator's visits and custody of his children in this matter is itself reliant upon the foundation and language of an invalid March 28, 2025, Temporary Restraining Order entered by Judge Hilton at a time when he had no subject matter jurisdiction, that Preliminary Injunction must be vacated now as a matter of law.

Unless the Missouri Supreme Court has issued another Order that Respondent Hilton is currently hiding once again, this Court can now, finally address at its surface the corruption, the improper and invalid orders entered by

Respondent Hilton in this case, and the extreme *bias* perpetrated by Judge Hilton and his co-conspirators.

This Court need not listen closely to hear the Fat Lady Singing. Her voice rings in Judge Hilton's ears day and night now, and his behavior proves as much.

The urgency for a more substantive Order from this Court on bias, as opposed to simply impropriety and vacating the improper orders, is that ***Petitioner's children continue to suffer*** and now have ***no visits or overnights*** with their own father.⁹ Not even supervised visits which any reasonable judge would order had there been any real basis for the TRO in the first instance. All of this is detailed in Exhibit 1 and its many Exhibits filed contemporaneously herewith.

As is clear on the record, *one day* after Relator filed his Petition for Writ in *Hilton IA*, finally exposing the 21st Circuit and Family Court corruption, Judge Hilton **immediately retaliated** and entered an *ex parte* Temporary Restraining Order ("TRO") based upon allegations belied by the *actual* evidence known to all involved. Relator provides this additional background to demonstrate to this Court and others the immediate *retaliation* that he unfortunately expected and has

⁹ The appellate path of least resistance is for this Court to simply vacate Judge Hilton's Orders entered in violation of *Buford* and *Caracci*, and stay the trial court case until Senior Judge Brown rules on Relator's May 17, 2025, *New Evidence* Motion for Change of Judge for Cause and/or his May 20, 2025, Rule 74.06(b) Motion to Vacate and Set Aside Senior Judge Brown's April 2, 2025 Order of denial entered *in absentia*. However, Relator urges this Court to review the timeline of when Senior Judge Brown was appointed on March 4, 2025. While Relator has no knowledge of the events that transpired, as of the date on which Relator's Emergency Petition for Writs to this Court was filed, March 26, 2025, no hearing before Senior Judge Brown had even been scheduled. This scenario remains a complete mystery and its existence weighs heavily against forcing Relator's ***children*** to await more scheduling, more hearings, and more rulings before they can at least return to their pre-March 27, 2025 (*ex parte* TRO) custody and visitation schedule with their own father. Indeed, Relator has not even been provided contact information for Senior Judge Brown in any manner. He had no ability to send a non-*ex parte* communication to Senior Judge Brown alerting him of Relator's filings and had no ability to request for a hearing setting. The volcano of Due Process violations in this case continues erupt.

continued to suffer by choosing to step-up and expose the 21st Circuit Court corruption to the appellate courts of this State of Missouri, once and for all. More recently, the corrupt portion of Missouri Republican machine has sought to punish Relator's wife, and attempt to take her son from her as well. Again, all detailed in Exhibit 1.

Relator represents the perfect storm to fight this corruption and lead the effort to locate the head of the monster and *figuratively* cut it off.

Relator is not only a *pro se* party, he is a Missouri licensed attorney with an AM Law 100 law firm litigator background and skillset that uniquely allows him to methodically attack the corruption in the 21st Circuit consistent with not only the Missouri Rules of Civil Procedure, but also, the Rules of Appellate procedure.

Relator's resume speaks for itself and the idea that he has gone through all of this turmoil and punishment to expose corruption that does *not* exist, is simply preposterous.

Relator commenced this mission for justice not only for his children and himself, ***but also for the other children*** in St. Louis County, Missouri that have been, are currently, or will be victims of the well-oiled, criminal machine within which the members of the corrupt conspiracy engage in theft by deception and fraud, to obtain money and power. The corruption that Relator presents to this Court, now with a objective and compelling evidence, has persisted for far too long and it must be stopped.¹⁰

Relator promised this Court even more *objective* evidence as part of his strategy in this case, and he now files mountains of that evidence of corruption in the 21st Circuit and within its Family Court.

¹⁰ Relator is aware that reliance upon only his words and his credibility would never be enough. As Relator alluded to in *Hilton IA*, he has spent months developing a trial court record that is irrefutable in its conclusion. Now, it is Respondent Judge Hilton by his own unlawful and unbelievable actions that confirms what Relator has been saying all along.

Respondent Judge Hilton, the Presiding Judge of the 21st Circuit, has somehow been chosen by his peers to oversee the entire court, and he has used that power to engage in corruption himself and he has used his power to *attempt*, now unsuccessfully, to keep the long-running corruption within the St. Louis Family Court immune from exposure to outsiders.

As this Court observed in Relator's filings in *Hilton IA*, Judge Hilton's comments regarding fear of only the Missouri Supreme Court were well-founded. Even now, once caught and exposed, the Presiding Judge of the 21st Circuit Court of the State of Missouri, no small jurisdiction, thumbs his nose at this Court and the Missouri Supreme Court by continually, among other things, ignoring the dictates of *Matter of Buford* and *Caracci*.

With this Petition for Writs, Relator again urges this Court, as he has called on others, to address the corruption that permeates the halls of the 21st Circuit Courthouse in Clayton, Missouri. For very good reason, the St. Louis County Courthouse, including at least its Family Court, has become a well-known cesspool of disrepute for which the public has no respect and for which it is deservedly known to lack more than a hint of integrity.¹¹

Once again, Relator presents the appellate courts of the State of Missouri the opportunity to assist him in his quite difficult mission to end corruption in the St. Louis County Courthouse once and for all. Those that have occasion to spend time in the political circles of Missouri are knowledgeable of the true roles played by the individuals that select judicial committee members, and make judicial recommendations to the sitting Governors, and even arrange appointments at the

¹¹ Relator notes that his comments are not limited to the St. Louis County Family Court solely because Judge Hilton sits atop the entire 21st Circuit as its Presiding Judge. Relator often practices before non-Family Court 21st Circuit judges and appointees of both political parties without issue or any sense of bias. Again, the corruption is both extensive but focused at the same time.

federal level, in this great state. Those knowledgeable people know the fight that Relator has picked is with the largest bully in the entire state.

The Missouri non-partisan plan is far from non-partisan. As relevant here, it has been used by the powerful Republicans to place corrupt individuals precisely where they are needed to perpetuate this corruption in the desire for money and power.

It is no coincidence that Respondent Rebecca A. Copeland's lawyer, Maia Brodie, is a Special Representative of the Office of Chief Disciplinary Counsel for Region 10 in St. Louis, Missouri. Another well-planned placement that allows her to serve as an arbiter of what ethical allegations progress. It is well-thought out and actions just like that have been implemented and have been working for the corrupt scheme for decades.

As will be addressed in these Writ filings and proceedings, Relator has already paid dearly for his conscious choice to take on the corrupt arm of the Republican machine that runs Missouri politics, and Missouri judicial appointments, both state and federal, in this Red State.

From a legal perspective, this Petition for Writs is easy to resolve. As noted, Judge Hilton's Orders at issue in this Petition for Writs were entered in blatant violation of *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979), and *Elnick v. Caracci*, 255 S.W.3d 692 (Mo. App. E.D. 2008). Importantly, all Orders entered between February 27, 2025, and April 2, 2025, are similarly null and void. Again, all Orders entered by Judge Hilton after May 17, 2025, and up through this moment are null and void as a matter of law.¹²

¹² For purposes of this Petition only, Relator does not argue that Judge Hilton did *not* have subject matter jurisdiction between April 2, 2025, and May 17, 2025. As discussed herein, only Judge Hilton's April 23, 2025 Trial Preparation Order is thereby at issue and it should be suspended by the stay sought by Relator. The April 4, 2025 Preliminary Injunction is null and void as a matter of law due its contents.

Most importantly here and now, Judge Hilton's May 21, 2025 denial of Relator's May 17, 2025 *New Evidence* Motion for Change of Judge for Cause, and his May 20, 2025, Motion to Vacate and Set Aside Judge Brown's April 2, 2025 Order entered *in absentia* must be reversed as they are null and void.¹³

As per the children in this matter, this reversal **includes** the Preliminary Injunction that keeps them from their father. While it may have been entered with temporary jurisdiction, its entire basis is an incorporated TRO that is null and void itself as a matter of law:

In the CIRCUIT COURT of St. Louis County, Missouri		FILED APR 4 2025 JOAN M. GILMER CIRCUIT CLERK, ST. LOUIS COUNTY	
Plaintiff(s) <u>Matthew Grant</u>		Date	<u>April 4, 2025</u>
vs.		Case Number	<u>12SLDR03959-02</u>
Defendant(s) <u>CMG, Rebecca Caplan</u>		Division	<u>13</u>

Order

Respondent's Motion for Preliminary Injunction to replace the Court's Temporary Restraining Order of 4/28/25 is called, heard and granted in part and denied in part. The parties fail to appear at the hearing. The Court's orders of 3/25/25 remain in full force and effect in the form of a Preliminary Injunction. The Court reiterates its order that neither parent shall communicate with the minor children regarding the pending litigation. The case remains set for trial on June 23, 2025, with 4 hours allocated to Petitioner, 4 hours allocated to Respondent, and 2 hrs allocated to the Court to present their cases to the Court.

SO ORDERED

[Signature] April 13

Judge
ENTERED: 4/4/2025
(Date)

COOPH/MS Rev. 02/14

Address	Box No.
Address	
Phone No.	Fax No.
Attorney	Attorney
Address	Address
Phone No.	Fax No.

Exhibit F-3

¹³ As discussed in more detail below and in his Motion to Vacate the April 2, 2025 Order of denial entered *in absentia* was legally and proximately caused by Judge Hilton's ongoing fraud in this matter including specifically his concealment of the Missouri Supreme Court's March 4, 2025 Order, or, in the alternatively, is the result of excusable neglect relating to Relator's interpretation of the **23-day-old hidden and concealed sua sponte** Order from the Missouri Supreme Court appointing retired Circuit Judge T. Lynn Brown as Senior Judge for this matter that caused him to abruptly leave this country for the safety of a foreign location.

For these reasons, Relator respectfully requests prompt and immediate action from this Court. A simple stay will accomplish much if time is too short before June 2, 2025, at 1:00 p.m. to address the corruption and obvious bias in this case.

B. MISSOURI LAW IS CLEAR THAT THE REDACTED AND NON-CRIFS TRIAL COURT FILINGS AND ALL COURT ORDERS MUST BE UNSEALED AND SUBJECT TO PUBLIC ACCESS.

As a separate but related Order that must be reversed, Judge Hilton entered a perfunctory denial of Relator's May 20, 2025, Emergency Motion To Open All Division 13 Hearings And Trial Days To The Public, Including The Hearing Improperly Set For Tomorrow Morning, May 21, 2025, And For The Unsealing Of A *Discrete Portion* Of This Case – Non-CRIFS Docket Entries ("Motion to Unseal"). That Order need not only be vacated as null and void, the underlying Motion should be granted as a matter of law.

Most telling, Judge Hilton failed to even read or consider Relator's Motion to Open the Courtroom and unseal a portion of the redacted docket, despite Relator's statement that he provided Judge Hilton mandatory precedent addressing the public's *presumptive* right of access to the non-CRIFS (REDACTED) docket filings and court orders in this case, due to the allegations and *objective proof* of corruption within the 21st Circuit Court of the State of Missouri, perpetrated by, among others, its Presiding Judge and at least one Family Court Commissioner – Mary W. Greaves.

As is discussed in more detail below, the default Court Operating Rule that creates the confidentiality for Paternity actions in this State is an exception to the rebuttable rule that the Constitution of Missouri guarantees citizens of this State the right to access this State's court records.

There are circumstances, such as here, where a party or even an intervenor can challenge that confidentiality Operating Rule in any given case. When that happens, it is the Court, or anyone that seeks to keep confidentiality, that must go

first and bear the heavy burden of proving why the exception to the rule should continue to be jettisoned in this particular case.

The general public, Missouri's citizens, have an absolute right to access limited court records in this case at the trial court level. The Missouri Supreme Court addressed in *Transit Cas. Co. ex rel. Pulitzer Publishing Co. v. Transit Cas. Co. ex rel. Intervening Employees*, 43 S.W.3d 293 (Mo. banc 2001), the very reason for the public's **presumptive** right to access court records and precisely how that should be handled when raised. Here, matter of corruption is what makes that **presumption irrebuttable**. This Court need not address the propriety of the default Court Rules governing other Paternity matters, this one is very unique.

This case involves the Presiding Judge of the 21st Circuit Court of the State of Missouri caught committing what are no less than crimes, corruption and fraud upon Relator and the very institution for which he is sworn to uphold and in which he is obligated to ensure Due Process is provided.

Admittedly, the presumption of public access *may* be rebutted in paternity cases as a whole, but the **presumption** of public access to the records in this **specific** Paternity matter cannot be rebutted in light of Relator's allegations and proof of corruption within the 21st Circuit Court and its Family Court.¹⁴

As *Transit Cas. Co. ex rel. Pulitzer Publishing Co.* mandates, Judge Hilton was obligated to create a record of evidence as to why the public's presumptive right to access did not prevail. It was the Court's burden of proof. The burden was also on the respondent at the trial court level, but no one did anything as this case has become a farce. There is no justice involved in this case. There never was. Not since the moment OCDC Special Representative Maia Brodie entered her

¹⁴ Relator does not concede that the Court's Operating Rules on this issue, *as currently drafted*, can survive the intense constitutional scrutiny that is required by the Constitution of the State of Missouri. However, that issue can await a challenge and a ruling on another day.

appearance in this case and Guardian *Ad Litem* John Fenley was chosen by the parties and/or the court.¹⁵

With regard to the very important issue of the children's and the parties' rights of privacy, there are mechanisms that an impartial judge can put in place, if necessary, to keep aspects of hearings and certain filings protected if not otherwise encompassed by the Protective Order that Relator demanded in this case, and that was entered on July 23, 2024.

The children's privacy in this matter is *paramount*, but that concern does not justify the wholesale concealment from the public exactly what the corruption in the 21st Circuit Courthouse has done in this case. Here, it was Relator that demanded the Protective Order that is in place in this case. It is that Protective Order, coupled with the REDACTIONS that provides *dual* protection for any private information at issue.

C. RELATOR'S URGENT MOTION TO STAY TRIAL COURT PROCEEDINGS SHOULD BE GRANTED IMMEDIATELY.

For the reasons detailed in these Petition for Writs filings, Relator is confident that Respondent Judge Hilton is planning yet another round of *retaliatory* actions towards Relator. Indeed, Relator suggested that this filing would await Judge Hilton's June 2, 2025 hearing rulings in order to buy more time for the preparation of these filings, on top of all the others he has filed recently.

Of course, Relator had no intention to allow Judge Hilton to unload more orders and punitive rulings for Relator to undo.

For these reasons, Relator requests that this Court invalidate all Orders entered by Judge Hilton after the minute and second this Petition for Writs is filed until this Court has issued its ruling(s).

¹⁵ For the sake of brevity, Relator will not substantially address the corruption of Commissioner Mary W. Greaves who recused once caught in *ex parte* judicial communication with OCDC Special Representative Maia Brodie.

Again, when Relator last took a Writ to this Court, Judge Hilton ***took his children from him less than 24 hours later***. Judge Hilton is a soulless and vengeful human being who will undoubtedly seek more retribution as Relator continues to reveal him for what he is to Missouri's unknowing lawyers and citizens.

D. SUPPORT FOR PETITION FOR WRITS

In support of his Petition, Relator states:

1. Relator returns and seeks the assistance from this court to end the corruption that has taken place in this particular case.
2. Presiding Judge Hilton's ongoing actions in this matter coupled with Missouri Rules of Judicial Conduct, establish, ***as a matter of law***, that he cannot remain the trial judge in this matter.
3. The most recent ruling in this case that resolves the issues before this court is Relator's May 17, 2025, Relator filed a *New Evidence* Motion For Change Of Judge And To Disqualify Judge Hilton And The Entire 21st Circuit For Cause And/Or Due To The Appearance Of Impropriety, Due To Pervasive Judicial, Guardian Ad Litem, Lawyer, And Courthouse Personnel Corruption, And For Assignment Of New Trial Judge By Appointed Senior Judge T. Lynn Brown. (Ex. 1 Exhibit Pages 1 through 112) and the exhibits thereto (Exhibit Pages 113 through 801)
4. The moment Relator filed the Motion for Change above, Judge Hilton was stripped of subject matter jurisdiction as a matter of law.
5. Judge Hilton remains without jurisdiction on this very day.
6. Additionally, Judge Hilton was aware that on May 20, 2025, Relator had filed His Motion To Vacate And Set Aside April 2, 2025 Order Entered *In Abstentia* Denying Peitioner's February 28, 2025 Verified Motion For Change Of Judge And To Disqualify Judge Hilton And The Entire 21st Circuit For Cause And/Or Due To The Appearance Of Impropriety, Due To Pervasive Judicial, Guardian *Ad Litem*,

Lawyer, And Courthouse Personnel Corruption, And For Assignment Of New Trial Judge. Ex. 5 (Exhibit Pages 802 through 814) and Exhibits thereto Exs. 6 through 15 (Exhibit Pages 815 through 1027).

7. Relator made the same request in a footnote in his May 17, 2025, *New Evidence* Motion for Change of Judge, but he filed a separate motion to perfect the docket as he promised.
8. Judge Hilton was fully aware that Relator had filed a proper Motion to Vacate pursuant to Rule 74.06(b), and that he would argue to Senior Judge T. Lynn Brown that at least excusable neglect and fraud as the reasons, among others, for his in-person absence at the Motion April 2, 2025, hearing.
9. As this Court may be aware, as Relator noted in his filings with the Missouri Supreme Court, he was in a foreign country out of fear for his personal safety.
10. Relator and a relatively few others truly understand what Relator has done by exposing Presiding Judge Hilton.
11. Relator sought safety abroad because while Presiding Judge Hilton is the top of ladder in the 21st Circuit Courthouse, the scheme of corruption spreads much broader and, more importantly, much higher in this State.
12. In any event, these issues were for Senior Judge Brown to consider and rule upon and Judge Hilton denied him that right, intentionally, because he fears the rulings that would follow.
13. Judge Hilton knew it was likely that Senior Judge Brown would opt for a ruling on the merits so he did what he always does, he ignored the law and he ruled that Senior Judge Brown could not rule on whether his Order entered *in abstentia* should be set aside.

14. Again, this case involves a Presiding Judge and his co-conspirators that already know how this ends. So why not drag it out as much as possible and hope for a miracle.
15. Judge Hilton's May 21, 2025, Order denying Relator's Motion to Vacate directed at Senior Judge Brown was entered without subject matter jurisdiction and it must be set aside as well.
16. Judge Hilton had no subject matter jurisdiction to enter it and even if he did, only the judge that *signs* and *enters* the Order can consider whether she or he believes that a Rule 74.06(b) Motion is well-taken.¹⁶
17. All of this follows the real hammer that Judge Hilton crushed Relator with in this case for going public and to the appellate courts with this case and the corruption within it.
18. Judge Hilton and his co-conspirators entered an *ex parte* TRO the day after Relator's prior Writ filings in this Court.
19. ***Less than 24 hours after*** Relator filed his Petition for Writ with this Court in Case No. ED113446, Judge Hilton took his children completely away.
20. Exhibit 1 to these Writ filings explain all of this in detail.
21. Losing his children completely, for the moment, is the cost to be paid by Relator for exposing the corrupt arm of the Republican machine in this Red State.
22. Again, those orders were null and void because Relator's February 27th and 28th Motions for Change of Judge were still pending.
23. No ruling came down on them until April 2, 2025.
24. It is because of the language of the Preliminary Injunction that Relator need not present a Motion to Dissolve the Preliminary Injunction.

¹⁶ Here, this Court can address this issue as a matter of law based upon the undisputed court record and docket.

25. As explained above, due its content and reliance upon a null, void and invalid foundation (TRO), that Preliminary Injunction must fall as a matter of law.
26. Of course, the same results follow for the other Orders Judge Hilton improperly entered without subject matter jurisdiction in this case.
27. For these reasons, Relator asks this Court to provide him with his first piece of justice in this long-fought battle.
28. While this Court is limited due to its appellate court nature, this Court has immense power in light of the evidence now before this court.
29. Judge Hilton caused a fraud on this very Court, the public's Missouri Court of Appeals.
30. Judge Hilton, the Presiding Judge of the 21st Circuit Court of the State of Missouri hid a *momentous Order from the Missouri Supreme Court* dated March 4, 2025, from Relator and, from this very Court.
31. That evidence alone is enough to start the process of the selection of a new trial judge in this matter.
32. That evidence and the evidence of bias that pours out of every page bearing Relator's words are enough to invalidate the Preliminary Injunction that keeps the children in this case from their father 100% of the time.
33. Justice. Fair. Impartial. Justice.
34. That is what Relator seeks from this Court.

FACTS

Taken chronologically, the relevant events began on February 27th and 28th, 2025. Those are the dates that Relator filed his prior Motion for Change of Judge based upon the very limited evidence available at that time. Ex. III (Exhibit Pages 733 through 750) and Ex. JJJ (Exhibit Pages 751 through 768). Missouri law is clear that Judge Hilton was stripped of subject matter jurisdiction until there was

ultimately a ruling by Senior Judge Brown *in absentia* on April 2, 2025. Ex. F-3 (Exhibit Page 211).

During the intervening days when Judge Hilton lacked jurisdiction, he entered a litany of Orders that are invalid and null and void as a matter of law. Ex. KKK (Exhibit Page 769), Ex. LLL (Exhibit Page 770), and Ex. MMM (Exhibit Page 771).

After those Orders were entered by Judge Hilton without subject matter jurisdiction, the Missouri Supreme Court entered a *sua sponte* Order appointing retired Circuit Judge T. Lynn Brown as the Senior Judge for this matter only. Ex. OOO (Exhibit Page 773).

This Order was concealed by Judge Hilton, or at a minimum, it was strangely not published to the court docket in this case until March 27, 2025, *one day after* Relator's Petition for Writ in Case Number ED11344, and these actions were part of the ongoing actual bias and corruption in this case. Ex. 5 (Exhibit Pages 802 through 814), Ex. 6 (Exhibit Pages 815 through 925), Ex. 7 (Exhibit Pages 926 through 943), Ex. 8 (Exhibit Pages 944 through 961), Ex. 9 (Exhibit Page 962), Ex. 10 (Exhibit Pages 963 through 964), Ex. 12 (Exhibit Page 967), Ex. 13 (Exhibit Pages 968 through 969), Ex. 14 (Exhibit Pages 970 through 1024), Ex. 15 (Exhibit Pages 1025 through 1027).

On that same day, March 27th, Judge Hilton retaliated against Relator for his March 26th Writ filings in this Court, and he immediately took his children away 100% of the time. *Id.*

Similar to his actions on February 28, 2025, on March 28, 2025, Judge Hilton entered more null and void orders as punishment. First, although knowing that Relator was out of town, Judge Hilton ordered him to undergo a hair follicle drug test in St. Charles, Missouri, based upon nothing but pure speculation. Ex. 19 (Exhibit Pages 1135 through 1136). As Relator has already documented at the trial court level, the Motion for TRO was filed in bad-faith. Ex. 20 (Exhibit Pages 1137 through 1150). Second, Judge Hilton granted Respondent Rebecca A. Copeland

sole legal custody to continue the unnecessary therapy that was part of the corrupt co-conspirator's plan of ongoing parental alienation. Ex. F-2 (Exhibit Page 210). Judge Hilton arguable regained jurisdiction on April 2, 2025, when Senior Judge Brown issued a ruling on the February 27th and 28th, 2025 Motion for Change of Judge. Ex. F-3 (Exhibit Page 211). Then, on April 2, 2025, Judge Hilton entered a Preliminary Injunction *in absentia* that was based solely upon the language of the March 28, 2025, TRO that was invalid, null and void as a matter of law. *Compare* Ex. F-3 (Exhibit Page 211) *with* Ex. F-2 (Exhibit Page 210).

On April 25, 2025, Relator underwent 2 fair follicle tests to prove what everyone knew, he was no illegal drug user. Ex. I (Exhibit Page 245) and Ex. J (Exhibit Pages 246 through 248).

No further testing was needed for alcohol use as Respondent Rebecca A. Copeland and Guardian *Ad Litem* John Fenley received the more than 1,100 passing (100% passing) breathalyzer test results that spanned ***more than 14 months***, that Relator took, including on the days before, on, and after the TROs and the Preliminary Injunction hearings and orders. Ex. K (Exhibit Page 249).

The TROs and the Preliminary Injunction were nothing but *pure retaliation* for Relator's March 26, 2025, Petition for Writs filed with this Court in Case Number ED11344. All of this is laid out in detail in Relator's Supplement to his pending Oral Motion To Vacate And Dissolve April 4, 2025, Preliminary Injunction. Ex. 20 (Exhibit Pages 1137 through 1150).

On May 17, 2025, Relator filed a New Evidence Motion for Change of Judge for Cause that stripped Judge Hilton of subject matter jurisdiction once again. Ex. I (Pages 243 through 244) and Ex. J (Exhibit Page 246 through 248).

While Relator included a Rule 74.06(b) request in May 17, 2025, Motion for Change of Judge for Cause, he filed a stand-alone Motion on May 20, 2025. Ex. 5 (Exhibit Pages 802 through 814), Ex. 6 (Exhibit Pages 815 through 925), Ex. 7 (Exhibit Pages 926 through 943), Ex. 8 (Exhibit Pages 944 through 961), Ex. 9 (Exhibit Page 962), Ex. 10 (Exhibit Pages 963 through 964), Ex. 12 (Exhibit Page

967), Ex. 13 (Exhibit Pages 968 through 969), Ex. 14 (Exhibit Pages 970 through 1024), Ex. 15 (Exhibit Pages 1025 through 1027).

On the same day, May 20th, Relator filed an Emergency Motion to Open the Courtroom and Unseal the Redacted portion of the Court's docket. Ex. 16 (Exhibit Pages 1028 through 1085).

Faced with these three most recent filings from May 17th and May 20th, 2025, and no subject matter jurisdiction in the case, Judge Hilton went forward with the hearing set on May 21, 2025, and he denied each of Relator's Motion, even the Motions directed to Senior Judge Brown and *those not even set for hearing*. Ex. 21 (Exhibit Page 1151).

With the Orders of May 21, 2025, this case is now awaiting an improper hearing before Judge Hilton, who lacks any jurisdiction, and who clearly plans to strike Relator's pleadings as further punishment for exposing his corruption. Ex. 18 (Exhibit Pages 1096 through 1134).

RELIEF SOUGHT

Relator prays this honorable Court take a series of actions. First and foremost, Relator asks that this court rule, as a matter of law, that Respondent Judge Hilton is disqualified and cannot remain the trial court judge in this case as a matter of law.

Second, Relator asks that this Court enter an Order vacating and invalidating the series of Orders that Judge Hilton entered without any subject matter jurisdiction in this case as is clear from a simple reading of *Matter of Buford*, 577 S.W.2d 809 (Mo. banc 1979), and *Elnick v. Caracci*, 255 S.W.3d 692 (Mo. App. E.D. 2008).

For example, because the April 4, 2025, Preliminary Injunction cannot stand without the March 28, 2025, Temporary Restraining Order, it too must fail as a matter of law. That ruling by this Court is needed as it will return Relator's children back to their pre-March 27, 2025, custody and visitation schedule in this case. While much more remains to be done, this is a quick start.

Third, now that Judge Hilton has made Senior Judge Brown's ruling on the

Motion for Change of Judge unnecessary as a matter of law, Relator asks this Court to transfer this matter to the Missouri Supreme Court so that a new trial judge can be appointed.

Alternatively, this Court should vacate and reverse Judge Hilton's denials of Relator's May 17, 2025, *New Evidence* Motion for Change of Judge for Cause and his May 20, 2025, Motion to Vacate and Set Aside Judge Brown's April 2, 2025, Order entered *in absentia*. At an absolute minimum, Senior Judge Brown must be allowed to carry out the duties assigned to him by the Missouri Supreme Court.

Fourth, as is mandated by *Transit Cas. Co. ex rel. Pulitzer Publishing Co. v. Transit Cas. Co. ex rel. Intervening Employees*, 43 S.W.3d 293 (Mo. banc 2001), this matter at the trial court level, and the filings before this Court, should be made available to the public. The public has a right to access and see the allegations and proof of corruption within their 21st Circuit Courthouse. This case not only involves corruption by a currently sitting Commissioner, but, more shockingly, corruption dispensed by the 21st Circuit's sitting Presiding Judge.

Fifth, this Court should *enter an immediate stay* in the underlying case relating to any actions by Judge Hilton and reversing any rulings he makes between the moment of these Writ filings are made and when this Court's ruling comes down. Of course, removal of Judge Hilton is the simplest path as opposed to a stay.

Importantly, Judge Hilton has colluded with his co-conspirators and has set a pre-textual hearing on a Motion to Strike on June 2, 2025 at 1:00 p.m. that will surely result in the complete striking of Relator's pleadings and much more.

WHY A PRELIMINARY WRIT(S) SHOULD BE ISSUED

This Court should issue preliminary writs of prohibition and mandamus because the instant Writ proceedings present both an *urgent* and also *unprecedented* situation of blatant, pervasive judicial corruption.

This matter is of such importance that the Missouri Supreme Court deemed it

appropriate to issue a *sua sponte* Order dated March 4, 2025. These allegations have merit as the record reflects.

A hearing on a Motion to Strike directed at all of Relator's pleadings and defenses, etc. is set for **June 2, 2025 at 1:00 p.m.** That hearing is a set-up and will serve as nothing more than additional punishment to be doled out to Relator for finally exposing the St. Louis County corruption to the appellate courts of the State of Missouri.

Please note that the underlying matter is set to go to trial on June 23rd and 24th, 2025 before Judge Hilton - the very criminal that has committed these injustices and that has violated Relator's Due Process Rights over and over again.

Relator's children have suffered long enough. The harm is *irreparable* but it can be stopped.

This situation cries out for justice. This situation cries out for action from this Court.

WHEREFORE, Relator respectfully requests that this Court grant the relief the request herein and for such further relief as the Court deems just and proper.

Respectfully submitted,

/s/Mathew R. Grant

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Pro Se Relator

NOTARY ACKNOWLEDGEMENT

State of Missouri)

County of St. Louis)

On this 30th day of May, 2025, before me, the undersigned notary, personally appeared Matthew R. Grant, proved to me through identification documents (a Missouri Driver's license), to be the person whose name is signed on the preceding or attached document, and acknowledged to me that he signed it voluntarily for its stated purpose.



Affiant



Notary

