

MISSOURI SUPREME COURT

STATE ex rel.

MATTHEW R. GRANT,

Case No.

Relator,

vs.

EDMO. 113826

The HONORABLE RICHARD ZERR,

Cause No. 2012SL-DR03959-02

Senior Judge,

The HONORABLE BRUCE HILTON,

Presiding Judge of the Circuit Court

of the County of St. Louis,

21st Judicial Circuit, Division 13,*Respondents.*

**PETITION FOR PRELIMINARY AND PERMANENT WRITS OF
PROHIBITION, OR IN THE ALTERNATIVE, PRELIMINARY AND
PERMANENT WRITS OF MANDAMUS**

COMES NOW, Relator Matthew R. Grant (“Relator”), pursuant to Rules 97 and 94, and petitions this Court to issue Preliminary and Permanent Writs of Prohibition and/or Mandamus, reversing Senior Judge Richard Zerr’s August 29, 2025 Order relating to his August 5, 2025 Joint Motion, that erroneously held that Respondent Hilton did *not* have to be disqualified from this case for cause pursuant to **RSMo. § 508.090 et seq.** as a matter of law.¹

That ruling was an abuse of discretion as it misapplied an improper *subjective* standard to Relator’s Motion for Disqualification for Cause. Missouri law requires an *objective* standard. As such, Respondent Zerr’s Order is an abuse of discretion and otherwise shocking in light of all evidence in the trial court record.

¹ Relator discovered and **corrected** his prior *mistaken* reliance on Rule 51.05 that dates back to when he was represented by two separate attorneys of record. His prior mistaken reliance can be the only reason for the appellate courts of this state failing to remove Respondent Hilton prior to this point in time. Fortunately, that error is now corrected and any blockaded path is now clear.

More importantly, Relator requests that this Court issue a ruling on Relator's ***Motion to Recuse*** that was included in the Joint Motion filed by Relator *but not ruled upon* or addressed *in any way* by either Judge Zerr or the Missouri Court of Appeals in ED113826 or any prior writ.² **Ex. A** (Exhibit Pages 1 through 33) through **Ex. DD** (Exhibit Pages 741 through 745) and **Ex. NN** (Exhibit Pages through). A remand is *unnecessary* as the evidence is overwhelming and supports Respondent Hilton's immediate removal either for objective cause or due to an objective appearance of impropriety.

BACKGROUND:

No judge other than Respondent Hilton has *ever* issued a ruling in response to Relator's ongoing and overlooked Motion for Recusal pursuant to Code of Judicial Conduct 2-2.11(a). Relator has been asserting his appearance of impropriety argument in court filings since February 27, 2025, and to date he has obtained ***no ruling at all***.

The ongoing refusal to address that Motion based upon Conduct Rule 2-2.11(a) is glaring, as Missouri law requires a finding of an appearance of impropriety in this matter and the removal of Respondent Hilton. Again, *every judge* except for Respondent Hilton, the very judge at issue in the Motion, has refused to rule on whether Relator's Motion for Recusal should be granted.

That abuse of discretion and the failure to recognize the *objective* evidence of bias and prejudice continues to cause *irreparable harm to the minor children* in this case that requires the *extraordinary remedy* of a writ from this Court. *See State ex rel. Grooms v. Privette*, 667 S.W.3d 92, 95 (Mo. 2023). As discussed in Relator's Suggestions in Support, this matter satisfies all 3 alternative bases for the issuance of a writ. *Id.*

² Relator expressly noted Senior Judge Zerr's power and asked for a ruling on this alternative motion. **Ex. AA** (Exhibit Pages 554 through 698, at 559:5-16).

Moreover, the doctrine of parens patriae urges this Court to act now. *State ex rel. R.P. v. Rosen*, 966 S.W.2d 292, 296 (Mo. App. 1998) (“if what is stated in the Petition is true, irreparable harm is likely to result and the State will have failed to protect a child, which it has a duty to do in its role as parens patriae.”)

STATEMENT OF FACTS

1. As proof that Respondent Senior Judge Zerr abused his discretion and also committed plain error, Respond Zerr bypassed Relator’s Motion to Disqualify and held that Missouri law ***only*** allows the Missouri Commission on Retirement, Removal and Discipline to review and rule upon a trial judge’s failure to recuse when required to do so under Code of Conduct Rule 2-2.11(a). **Ex. AA** (Exhibit Pages 554 through 698, at 559).

Senior Judge Zerr stated:

I've kind of seen that you've invoked both of those [Relator also moving under Rule 2-2.11-(a)], but it seems to me that that consideration is one for Judge Hilton to make and that's to be judged by the Commission on Discipline, Retirement, and Removal if they don't think they've recused themselves appropriately. I'm not sure I can recuse him. I can disqualify him, I agree with that. I'm not sure I can force him to recuse himself if he doesn't want to.

Ex. AA (Exhibit Pages 554 through 698, at 559) (emphasis added).

2. Judge Zerr held that the ongoing “mistakes” in this case by Respondent Hilton are insufficient to show his having *subjective* bias or prejudice.

Ex. DD (Exhibit Pages 741 through 745).

3. Judge Zerr incorrectly applied a standard not only of subjectiveness but also of motive. This mistaken legal analysis is proven by Judge Zerr’s statement in his Order:

In fact, when asked by the Petitioner, Judge Hilton responded that he has no bias against Petitioner.

Ex. DD Exhibit Pages 741 through 745) (emphasis added).

4. Respondent Hilton testified during the August 27th hearing before Senior Judge Zerr that his return of *only 4 of 10 days of custody and visitation owed each month* to Relator and his children was nothing more than a “mistake” and that he was just learning of it. Ex. AA (Exhibit Pages 554 through, at 660-662), Ex. KK (Exhibit Pages 1460 through 1461) and Ex. LL (Exhibit Pages 1462 through 1466).

5. Respondent Hilton evaded the very clear fact that he did not return to the custody in effect under the October 2, 2024 Interim Consent Order that added an overnight to the existing visitation schedule:

AUGUST 5, 2024 ORDER:

with the children shall be Wednesdays and Thursdays from 2:00 p.m. to 6:00 p.m. When school starts, Petitioner’s visits shall be on Wednesdays and Thursdays from 3:00 PM-8:00 PM and every other Sunday from Noon to 4:00 PM. The first Sunday visit shall take

Ex. KK (Exhibit Pages 1460 through 1461)

Interim Consent Order

The August 5, 2024 consent order shall be amended by agreement as follows:

1. Father shall have a weekly overnight visit with the minor children beginning on Oct. 3, 2024 after school until school begins the following morning. Father's overnight shall

Ex LL (Exhibit Pages 1462 through 1466).

6. The August 27, 2025 hearing took place in Respondent Hilton’s courtroom. Ex. FF (Exhibit Pages 797 through 801).
7. After learning that he wrongfully deprived the minor children in this of weekly visits with their father from June 16, 2025 until August 27, 2025, Respondent Hilton has taken no action to correct the custody schedule.

- Ex. FF** (Exhibit Pages 797 through 801); *see also* **Ex. EE** (Exhibit Pages 746 through 796).
8. At the August 27th hearing on the Motion for Recusal and Motion for Disqualification, Respondent Hilton distributed hard copies of a Court of Appeals case, *Hendrix v. City of Saint Louis*, 636 S.W.3d 889 (Mo. App. 2021), *having nothing to do with the issues before Judge Zerr*. **Ex. DD** (Exhibit Pages 741 through 745) and **Ex. FF** (Exhibit Pages 797 through 801).
9. When asked about the importance of the case, Respondent Hilton stared at Relator and stated “**YOU LOSE!**”³ **Ex. BB** (Exhibit Pages 699 through 725), **Ex. DD** (Exhibit Pages 741 through 745) and **Ex. FF** (Exhibit Pages 797 through 801).
10. The obvious interpretation of the Respondent Hilton’s comment “**YOU LOSE!**” was nothing more than him conveying to Relator that Respondent Hilton would still rule and punish him and necessarily *his children even if disqualified for cause*. **Ex. BB** (Exhibit Pages 699 through 725), and **Ex. FF** (Exhibit Pages 797 through 801).
11. During the same hearing, Maia Brodie, counsel for underlying respondent Rebecca A. Copeland and Special Representative of this Court’s Office of Chief Disciplinary Counsel (“OCDC”) made an *intentionally false statement* to Respondent Zerr.⁴ **Ex. AA** (Exhibit Pages 554 through 698).
12. Respondent Hilton entered an *ex parte* TRO based upon the claim of an alcoholic relapse by Relator *less than 24 hours after* Relator filed his

³ This precise quote, which was stated, is somehow missing from the hearing transcript. **Ex. AA** (Exhibit Pages 554 through 698). And yet, once again, it is documented in Relator’s filings in the Circuit Court. *See also* **Ex. BB** (Exhibit Pages 699 through 724, at 706-708) (citing “YOU LOSE” quote).

⁴ Relator requests that this Court take judicial notice of the Special Representatives of its own Office of Chief Disciplinary Counsel.

initial Writ with the Court of Appeals alleging corruption when it is undisputed the court ordered breathalyzer results showed that Relator had ***consumed no alcohol***, not only in the days leading up to the date of the March 27th *ex parte* TRO:

MARCH 2025

24	25	26	27
✓ 8:46 AM	✓ 8:58 AM	✓ 10:49 AM	<u>Ex Parte TRO</u>
✓ 4:44 PM	✓ 4:58 PM	✓ 4:19 PM	<u>Based Upon</u>
✓ 8:46 PM	✓ 8:59 PM	✓ 9:50 PM	<u>Supposed</u>
			<u><i>Relapse</i></u>

Ex. CC (Exhibit Pages 725 through 740).

13. The undisputed evidence shows that Relator had tested negative for alcohol consumption each day for the more ***than 11-month period*** preceding the March 27, 2025 *ex parte* TRO. **Ex. CC** (Exhibit Pages 725 through 740).

14. The evidence in the record shows that Relator has passed 100% of every one of the more than 1,450 facial recognition breathalyzer tests in this case and he tested negative for alcohol on the days leading up to the March 27, 2025 *ex parte* TRO. **Ex. CC** (Exhibit Pages 725 through 740).

15. The March 27, 2025 *ex parte* TRO was obtained based upon the argument that:

5. Petitioner has been to rehab six times and upon information and belief, Respondent believes Petitioner is currently in a rehabilitation or detox program/facility.

Ex. MM (Exhibit Pages 1467 through 1470); *see also* **Ex. BB** (Exhibit Pages 699 through 724, at 703).

16. There was no “upon information and belief” and that statement is false.

17. The current number of 100% passing tests is 1,789. Relator has still never failed a test. He must take 3 per day at set times. All tests that are a few

minutes late but passing are still listed as “missed.” **Ex. FF** (Exhibit Pages 797 through 801).

18. On March 27, 2025, relator Rebecca A. Copeland had the only information regarding Relator’s whereabouts and she had no actual concern that Relator had relapsed and was in rehab/detox:

Sent:	03/25/2025 at 09:08 PM
From:	Rebecca Copeland
To:	Matt Grant (First Viewed: 03/25/2025 at 10:07 PM)
Subject:	Re: Tomorrow and Thurs - OUT of TOWN
I'm sorry to hear that. I hope you're able to get done what you need to. Safe travels.	
Sent:	03/25/2025 at 08:51 PM
From:	Matt Grant
To:	Rebecca Copeland (First Viewed: 03/25/2025 at 08:55 PM)
Subject:	Tomorrow and Thurs - OUT of TOWN
I thought i had this covered but now i just found out i have to leaves town. I will miss tomorrow and Thursday.	
Hopefully you will kind enough to give me makeup days down the road.	
I just found out, so no way to give any more notice.	
Small chance i can get someone to go but looks unlikely. I will advise if things change.	

Ex. FF (Exhibit Pages 797 through 801).

19. Relator’s travel caused no concern or alarm to any party in this case. *Id.*

20. On March 26, 2025, Relator filed his Petition for Writ in the Court of Appeals including claims and exposing corruption.

21. The court record is devoid of any evidence or explanation for the basis for an *ex parte* TRO, as opposed to an opportunity for a hearing, as required by Rule 92.02(b). **Ex. EE** (Exhibit Pages 746 through 796).

22. The *ex parte* TRO was entered after this case was pending for more than 1 year. **Ex. EE** (Exhibit Pages 746 through 796).

23. Relator had asked the minor children’s mother, Rebecca A. Copeland, to retain custody of the children on the day the *ex parte* TRO was granted and the day after, and he would not have had the minor children at all until 4 days later. **Ex. FF** (Exhibit Pages 797 through 801).

24. The *ex parte* TRO was objective retaliation for Relator’s writ filing alleged corruption.

Q. Okay. The next day - Tell me if you recall this or not - *there was an ex parte TRO entered that was presented by Ms. Brody. Do you remember that?*

MS. BRODY: Your Honor, I'm gonna object to the characterization. It was not an ex parte order. It was set for hearing. And you received notice.

MR. GRANT: That's the 28th.

MS. BRODY: I applied for a date on the 27th. It was set on the 28th.
It was not an order entered. It was a notice of hearing.

Ex. AA (Exhibit Pages 554 through 698, at 653-654) (emphasis added).

26. The above statements by counsel, a Special Representative of this Court's
 OCDC, were *outright, intentional false statements fact*. And, they were
no accident.

27. The trial record is abundantly clear that both counsel Maia Brodie and Respondent Hilton knew and know that the March 27, 2025 ex parte TRO took place and is real:

[illegible]

BRODIE LAW
 By: *Maia Brodie*
 MAIA BRODIE, #38442
 Attorneys for Respondent
 8909 Ladue Road
 St. Louis, Missouri 63124
 (314) 726-6242
 (314) 726-5155 (Fax)
 mbrodie@brodiewlawstl.com

Ex. BB (Exhibit Pages 699 through 724, at 703).

IN THE CIRCUIT COURT OF SAINT LOUIS COUNTY
 STATE OF MISSOURI

In Re the Matter of:)
)
 MATTHEW R. GRANT,)
 PETITIONER,)
) Cause No.: 12SL-DR03959-02
 vs.) Division: 13
 C.M.G., ET AL,)
)
 RESPONDENT.)

TEMPORARY RESTRAINING ORDER

FILED
 MAR 27 2025
 JOAN M. GILMER
 CLERK ST. LOUIS COUNTY

5. This Order shall expire at 12:00 am (p.m.) on the 24th day of March, 2025.

6. The Motion for Temporary Restraining Order shall be heard on the 28th day of March, 2025, @ 9:30 AM or as soon thereafter as court office hours.

7. Bond shall be set in the amount of \$ 1000 and bond may be paid electronically.

2

SO ORDERED:
MAA Div. D

DATE: 3/27/2025
 TIME: 10:35 AM

Ex. BB (Exhibit Pages 699 through 724, at 703).

28. Counsel Maia Brodie's intentional false statements to Judge Zerr were an attempt to *rescue* Respondent Hilton from having to explain his granting of a baseless ex parte TRO.

29. As Relator correctly and honestly stated, the **March 28th Order** was the TRO entered after notice *the next day*:

In the
CIRCUIT COURT
of St. Louis County, Missouri

Matthew Grant
Plaintiff(s)

vs.

CMG ET-AI
Defendant(s)

Date: 3-28-2025
Case Number: 12SL-DR03959-02
Division: 13

FILED
MAR 28 2025
JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

Order

Cause called on Respondent's Motion for Temporary Restraining Order is granted in part + denied in part.

Petitioner's custody periods with the children are temporarily suspended pending Petitioner's drug test results. The drug test order is in a separate order.

Mother is granted sole legal custody for purposes of selecting a therapist for the minor children. Neither parent shall communicate with the therapist about the children's therapy.

Mother shall select a therapist for the children + sign a release for the GTC to speak with the therapist.

Neither parent shall communicate with the minor children about the pending litigation.

Respondent is granted leave to withdraw Respondent's Exhibit A.

SO ORDERED

* Petitioner Failed to Appear

Judge: J. B. Zerr
ENTERED: 3/28/2025
(Date)

Address: _____
Phone No.: _____
Fax No.: _____
Bar No.: _____

Address: _____
Phone No.: _____
Fax No.: _____
Bar No.: _____

CCOPR47-WVS Rev. 02/14

Ex. BB (Exhibit Pages 699 through 724, at 704-05).

30. Counsel for underlying respondent Rebecca A. Copeland, Maia Brodie, the OCDC Special Representative, knew the *ex parte* TRO existed because she herself filed the Motion and obtained it from Respondent

Hilton. **Ex. BB** (Exhibit Pages 699 through 724, at 703).

31. While not critical for this Court to address here, Relator's credibility is untouched and his claim of alteration of the January 21, 2025 hearing transcript is objectively true.

32. Relator filed contemporaneous evidence proving that his version of events and his claim of an altered transcript is true. **Ex. Y** (Exhibit Pages 469 through 540, at 469-71).

33. Even Respondent Hilton knows that the contemporaneous evidence is conclusive as he has suggested previously that possibly the missing transcript contents were made “off the record.” They were not. **Ex. FF** (Exhibit Pages 797 through 801).

34. At the August 27, 2025 hearing in this matter, Respondent Hilton even admitted *it was him that sent Relator home on that day* to reconsider his firm demand to be transferred to the Missouri Supreme Court for a non-21st Circuit Judge:

Q. Did you send me home that day at the end of the hearing to think about whether or not I wanted to consent to your jurisdiction?

A. *I think that's correct.*

Ex. AA (Exhibit Pages 554 through 698, at 647).

35. While the issue need not be reached by this Court in these proceedings, there is no doubt that corruption exists in the St. Louis Family Court.

36. Relator's Amended federal RICO and Civil Rights Act Complaint lays out precisely what has been happening in the 21st Circuit Court for the State of Missouri. **Ex. GG** (Exhibit Pages 802 through 882).

37. As one example, this is an email involving counsel and a Guardian *Ad Litem* in a 2017 St. Louis County Family Court case:

From: [REDACTED]
Sent: Monday, September 18, 2017 3:11 PM
To: [REDACTED]
Subject: [REDACTED]

All:

From my perspective, we have the October 13th TRO date and subsequent trial dates in November. How wedded are you to the trial dates? It is important that [REDACTED] get evaluated since we are buying future litigation. [REDACTED] thoughts? The alternative is [REDACTED] who is also a PhD and does a large volume of child evaluations for St. Louis County Juvenile Court.

Ex. J (Exhibit Pages 50 through 219, at 60) and **Ex. GG** (Exhibit Pages 802 through 882, at 820).

38. In the event that this Court is under the impression that Relator's belief of corruption is a result of the issuance, or omission of, this Court's March 4, 2025 Order appointing Senior Judge Brown from the trial docket,

Relator emphasizes that *he reported Respondent Hilton to the United States Department of Justice for criminal investigation back on February 3, 2025 before he entered a single ruling adverse to him:*



Compare Ex. EE (Exhibit Pages 746 through 796) *with Ex. GG* (Exhibit Pages 802 through 882, at 820).

39. Relator, as an Officer of the Court, has a mountain of evidence of corruption and he seeks to assist in its elimination.

40. As referenced above, on August 11, 2025, Relator filed a federal civil RICO and Civil Rights Act putative class action complaint in the Eastern District of Missouri that he has since amended. **Ex. J** (Exhibit Pages 50 through 219) and **Ex. GG** (Exhibit Pages 802 through 882).

41. Approximately *forty-eight hours after* the civil RICO filing, Respondent Hilton *objectively* entered an order requiring Relator to be accompanied by security each moment that he is inside the St. Louis County Court ("Escort Order"). **Ex. B** (Exhibit Pages 34 through 35).

42. The basis of the Escort Order is the fact that Relator complied with Federal Rule of Civil Procedure 4(g) and utilized U.S. first class mail to serve a Request for Waiver of service upon federal Defendant Commissioner Greaves who previously presided over this case before recusing. **Ex. R** (Exhibit Pages 286 through 291).

43. The trial court record includes an image from the U.S. Post Office showing the exact, very normal and standard white envelope used by Relator:



Ex. R (Exhibit Pages 286 through 291).

44. The absurd and false claim is that Relator sent a *suspicious package* in order to *intimidate* the recipient of the U.S. Mail. **Ex. B** (Exhibit Pages 35 through 35).

45. Relator mailed no suspicious package and Commissioner Greaves and Respondent Hilton's collusion on this issue is objectively apparent.

46. The federal civil RICO Defendant, Commissioner Mary W. Greaves, was previously trial judge in this case until she *recused* after Relator proved that she engaged in *ex parte* judicial communications and was biased. **Ex. EE** (Exhibit Pages 746 through 786) and **Ex. FF** (797 through 801).

47. Respondent Hilton readily admits that he did no investigation at all before issuing the prejudicial Escort Order based upon the statements of his federal RICO co-defendant. *Id.*

48. Because Relator followed FED.R.CIV.P. 4(g) and mailed a standard white envelope, containing a request for waiver of service, Relator now cannot walk the public areas of the St. Louis County courthouse for, presumably, the remainder of his life.

49. Respondent Hilton lacked any jurisdiction to enter the August 13, 2025, Escort Order in the first instance as it was entered after Relator's RSMo. § 508.090 Motion to Disqualify for Cause and before a ruling on that motion.⁵

50. On August 18, 2025, the Guardian *Ad Litem* in this case and federal RICO co-defendant, John Fenley, filed a Motion for Sanctions against Relator claiming he should be sanctioned for even filing the federal civil RICO and Civil Rights Act Complaint in the first instance. **Ex. C** (Exhibit Pages 36 through 41).

51. On September 4, 2025, *after* Respondent Hilton was *not* disqualified by Senior Judge Zerr, Relator requests this Court take judicial notice that Guardian *Ad Litem* Fenley supplemented his Motion for Sanctions with the absurd claim that he had suddenly remembered that Relator had supposedly mailed him his own threatening envelope, but his had balm, pencils and tape inside of it. **Ex. HH** (Exhibit Pages 883 through 890).

52. This is the same Guardian *Ad Litem* that previously offered Relator a *quid pro quo* of custody of his children for dropping his allegations of Guardian *Ad Litem* John Fenley's criminal behavior. *See* SC101140, **Ex. 30** (Thumb Drive).

53. The Guardian *Ad Litem*'s Motion for Sanctions fails to even include a photograph of the supposedly threatening envelope. **Ex. HH** (Exhibit Pages 883 through 890).

54. Relator did not mail anything to Guardian *Ad Litem* Fenley other than the waiver of service envelope. **Ex. FF** (Exhibit Pages 797 through 801).

55. Like the Escort Order, the claim of mailing balm, pencils and tape to the Guardian *Ad Litem* is, *objectively*, contrived as retaliation against Relator

⁵ The Court of Appeals refused to address this obvious issue despite being overtly raised by Relator. ED113826. The unaddressed errors in this case are more than alarming.

for the federal RICO and Civil Rights Act filing that took place on August 11, 2025.

56. Relator asks this Court to take judicial notice that on September 2, 2025, the St. Louis Family Court issued an *ex parte* adult Order of Protection against Relator that *required him to remove his federal complaint from all digital mediums*, including Facebook and his website www.StopMissouriCorruption.com. **Ex. II** (Exhibit Pages 891 through 892).

57. The Order of Protection *requires the removal and prohibits republishing of a public Complaint filing pending in federal court from public view*. **Ex. J** (Exhibit Pages 50 through 219) and **Ex. GG** (Exhibit Pages 802 through 882).

58. During trial, Respondent Hilton berated Relator for no reason:⁶

Do you know what the -- any of the triggers have been for my relapse or relapses?

A. So you're asking me for any instance since 2019?

Q. Yes. Do you know the cause?

A. No.

Q. Okay, thank you. Do you know that I've had two total hip replacements since 2019?

THE COURT: How is that relevant? How is that relevant?

MR. GRANT: Trying to -- well, strike that. It's --

THE COURT: Is it relevant because that's how you self-medicated? How is it relevant?

MR. GRANT: Yes, that is exactly what I was trying to get to.

THE COURT: Okay. So this is another excuse for your disease of alcoholism because you decided, as a mental health professional and as a psychiatrist/psychologist, that you could self-medicate; that that was okay?

⁶ As an important oddity, despite Relator filing the trial transcript as an Exhibit pursuant to a CRIFS filing with the trial court on August 26, 2025, it continues to fail to *actually* be available on the docket for viewing and/or download for counsel of record. **Ex. EE** (Exhibit Pages 746 through 796). As such, Relator attaches the trial transcript hereto as an independent Exhibit. **Ex. JJ** (Exhibit Pages 893 through 1459).

MR. GRANT: *No, Your Honor, I'm an alcoholic. I made terrible decisions.*

THE COURT: *Well, let's hear about those then instead of excuses, okay?*

MR. GRANT: *Okay.*

THE COURT: *Because hip replacements, surgery, that's no excuse for your behavior, none. So let's get something more relevant where you own it, Mr. Grant.*

MR. GRANT: I own that I have a disease.

THE COURT: So far, I haven't heard it.

Ex. JJ (Exhibit Pages 893 through 1459, at 1091) (emphasis added).

59. Following Respondent Hilton berating Relator on the stand, Relator being asked to apologize to Respondent Hilton during trial for his truthful allegations of corruption:

Q. *Would you like to apologize to the judge for saying he's part of a criminal conspiracy, and he's crooked?*

Ex. JJ (Exhibit Pages 893 through 1459, at 1394) (emphasis added).

60. Relator was placed in an impossible situation and given a Sophie's Choice. **Ex. JJ** (Exhibit Pages 893 through 1459, at 1394) (emphasis added).

61. Relator was forced to refuse to disavow his truthful claims before the very judge that will decide his future custody and child support rights and obligations, or hold firm and confirm more retaliation. **Ex. JJ** (Exhibit Pages 893 through 1459, at 1394) (emphasis added).

62. Relator held firm as his allegations are true. **Ex. JJ** (Exhibit Pages 893 through 1459, at 1394) (emphasis added).

63. Respondent Hilton routinely *mocking* Relator for relapsing in his battle with alcoholism when Respondent Hilton, himself an alcoholic, never has relapsed:

Judge Hilton, I only have a few questions for you.

Isn't it true you told me that you're an alcoholic?

A. That's correct.

Q. Okay. **And isn't it true that you pointed out that you've never relapsed?**

A. Correct.

Q. And isn't it true on at least two, if not three occasions you pointed out that I relapsed?

A. Correct.

Ex. AA (Exhibit Pages 554 through 698, at 643) (emphasis added).

64. There is *no relevance* to the fact that Relator unfortunately relapsed in his battle with his disease of alcoholism while Respondent Hilton did not.

65. As Relator has stated, Respondent Hilton has used the fact of relapse as some sort of evidence that he is a “better” alcoholic than is Relator and that has caused prejudice and bias as well. **Ex. FF** (Exhibit Pages 797 through 801).

66. These actions, in part, are why Relator’s federal civil RICO and Civil Rights Act case filing was not only justified but necessary, and why Respondent Hilton should be removed as trial judge in this case.

67. Respondent Hilton did *not* recuse after being named a federal RICO defendant, but instead, entered the Escort Order. **Ex. EE** (Exhibit Pages 746 through 796).

68. This Court should take judicial notice that Commissioner Greaves could have sought an Escort Order from a Duty Judge or any other judge if she had objective evidence indicating intimidation.

69. Relator presented Judge Zerr evidence that, as of August 28, 2025, more than 125,000 individuals had then viewed just one of the videos circulating that addresses the bias, prejudice, appearance of impropriety and corruption in this case and within the 21st Circuit Court for the State of Missouri. **Ex. BB** (Exhibit Pages 699 through 724).

70. Relator asks this Court to take judicial notice that *now* more than 500,000 individuals are documented to currently be watching Relator’s social media posts regarding the developments *in this case*. **Ex. FF** (Exhibit Pages 797 through 801).

71. Indeed, a *quarter-million* individuals have specifically viewed Relator's

Facebook profiles since he filed the federal civil RICO and Civil Rights

Act case on August 11, 2025. **Ex. FF** (Exhibit Pages 797 through 801).

72. This case has and *will continue* to garner deserved *national attention*.

For all of the reasons noted herein, this Court should *finally* intervene and provide ***the minor children*** and their father with a new, *objectively* impartial judge.

Surely, this Court will not reserve ruling on this matter for the final judgment appellate process and ***further prejudice the minor children*** in this matter who have been obvious collateral damage.

Relator reminds this Court that he previously presented this Court evidence that Respondent Hilton threatened that very outcome – prolonging this matter until both minor children reach the age of 18. *See* SC101040. This evidence and improper strategy by Respondent Hilton are not new.

The ***minor children are ages 14 and 16***. Each day they are losing valuable time with their father, even the time that Respondent Hilton mistakenly took away but has not returned. Irreparable harm is inflicted daily. ***The minor children*** and Relator deserve a new trial judge now. Relator respectfully requests that this Court assist his minor children and himself.

RELIEF SOUGHT

Relator seeks the following:

- A Writ in Prohibition and/or Mandamus reversing the August 29, 2025, “Judgment” entered by Senior Judge Zerr, and further ordering the removal of Respondent Hilton for cause, or due to appearance of impropriety, and assigning a new trial judge from outside the 21st Circuit Court for the State of Missouri to handle this matter by special designation;
- Entry of Stay in this case pending this Court's rulings; and
- Such further relief as this Court deems just and proper.

WHY THE WRIT SHOULD ISSUE:

Relator prays this Court address the ongoing *objective* bias, prejudice and appearance of impropriety that plagues this case. Relator has now corrected the procedural error in his prior Petitions and this matter is ripe for ruling.

This case involves *minor children* that cannot await a Final Judgment appellate process as manifest injustice and irreparable harm continues to occur. Under these unique circumstances, this Court should further act to ensure the public's trust in Missouri's judicial system.

The next hearing in this matter in which Respondent Hilton is expected to issue final rulings and then a final judgment is set for **September 29, 2025**.

Respectfully submitted,



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Email: mattgrant.stl@gmail.com

Pro Se Relator

NOTARY ACKNOWLEDGMENT

State of Missouri)

County of St. Louis)

On this 24th day of September, 2025, before me, the undersigned notary, personally appeared Matthew R. Grant, proved to me through identification documents, which was a Missouri Driver's license, to be the person who signed the preceding or attached document in my presence, and that the facts therein are true and correct according to the affiant's best knowledge and belief.


Affiant

Subscribed and sworn to before me, the undersigned Notary Public, on this 23rd day of September 2025.

 (official signature and seal of notary)

