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IN THE

**SUPREME COURT OF THE UNITED STATES**

**EMERGENCY APPLICATION FOR A STAY**

RICHARD SADDLER,  
Petitioner,

v.

CHRISTINE HONG,  
Respondent.

Emergency Application Directed to  
The Honorable Brett Kavanaugh,  
Associate Justice of the Supreme Court of the United States  
and Circuit Justice for the Eighth Circuit

RECEIVED

JAN 12 2026

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

# **EMERGENCY APPLICATION FOR A STAY**

To the Honorable Justice of the Supreme Court of the United States:

## **I. INTRODUCTION AND EMERGENCY POSTURE**

Applicant respectfully seeks emergency relief from this Court to stay enforcement of state-court orders entered in violation of mandatory Missouri Supreme Court Rule 68.5. Applicant was compelled to proceed to a dispositive financial hearing without counsel, without access to mandatory financial disclosures, and without the ability to prepare or respond to pending motions. Immediate relief is required to prevent ongoing and irreparable harm.

## **II. JURISDICTION AND PROCEDURAL POSTURE**

This Court has jurisdiction to consider this emergency application pursuant to 28 U.S.C. § 2101(f) and Rules 22 and 23 of the Rules of this Court. Applicant seeks temporary relief necessary to preserve the status quo and protect federal constitutional rights while state-court remedies are exhausted or shown to be unavailable.

Applicant is proceeding pro se and submits this application in paper form by commercial carrier due to inability to file electronically.

## **III. FACTUAL BACKGROUND**

This matter arises from family court proceedings in St. Louis County, Missouri, in which Applicant was compelled to proceed to a dispositive hearing without counsel and without access to his attorney's file, following the court's approval of counsel's withdrawal on the eve of hearing. Applicant sought a stay of proceedings prior to and during the hearing, which was denied, and the court proceeded to rule adversely against him.

Applicant has consistently asserted that Respondent has procured and continues to seek financial relief while refusing to comply with Missouri Supreme Court Rule 68.5, which mandates the exchange of financial disclosures before financial motions may be heard. Applicant further asserts that enforcement of the resulting orders is ongoing and that the deprivation of counsel and denial of a stay resulted in violations of due process.

## **IV. RULE 23.3 COMPLIANCE AND UNAVAILABILITY OF STATE-COURT RELIEF**

This application complies with Rule 23.3 of the Rules of this Court.

Applicant has sought the same stay relief in the appropriate state courts and such relief is unavailable.

### **A. Circuit Court**

Prior to the January 16 hearing, Applicant tendered a written Motion to Stay Proceedings to the Circuit Court of St. Louis County, requesting that enforcement and further hearings be stayed due to unresolved discovery violations and the withdrawal of counsel. The trial court declined to grant a stay and proceeded with the hearing. A filed Motion to Stay Proceedings was later submitted to the circuit court and is included in the Appendix.

### **B. Supreme Court of Missouri**

Applicant subsequently sought emergency stay relief from the Supreme Court of Missouri in Case No. **SC-101408**, by filing an Emergency and Expedited Motion for Reconsideration and for Stay of Enforcement.

By letter dated December 29, 2025, the Clerk of the Supreme Court of Missouri returned Applicant's emergency motion unfiled and expressly stated that **no further action would be taken because the case was closed**. As a result, stay relief is procedurally unavailable in the Supreme Court of Missouri.

### **C. Explanation of Unavailability**

Because the trial court denied a stay and proceeded with enforcement, and because the Supreme Court of Missouri declined to accept or act upon Applicant's emergency stay request, there is no remaining state-court forum in which Applicant can obtain the requested stay. Applicant therefore satisfies Rule 23.3's requirement that the same relief be sought below or that relief be shown to be unavailable.

Copies of all relevant filings and the Missouri Supreme Court Clerk's letter are included in the Appendix to this application.

## **V. REASONS FOR GRANTING A STAY**

Absent a stay, Applicant will continue to suffer irreparable harm through enforcement of orders entered following a hearing conducted without counsel and without access to essential case

materials. Monetary enforcement, coercive orders, and continuing litigation burdens cannot be undone after the fact and threaten Applicant's constitutional rights.

A stay is necessary to preserve the status quo while Applicant pursues available appellate remedies and to prevent further irreparable harm.

## VI. RELIEF REQUESTED

Applicant respectfully requests that this Court:

1. **Issue an emergency stay of enforcement** of the challenged state-court orders entered following the January 16, 2026 hearing;
2. **Stay further proceedings related to enforcement** pending exhaustion of available state remedies and further review;
3. **Grant such other and further relief as this Court deems just and proper** to preserve the status quo and protect Applicant's constitutional rights; and
4. **Issue a writ of mandamus and/or prohibition directing the lower courts to enforce Missouri Supreme Court Rule 68.5(e) and Rule 61.01**, and to prohibit further financial proceedings unless and until mandatory financial disclosures are exchanged, including the consideration and application of sanctions expressly authorized by those rules where noncompliance is willful, ongoing, or prejudicial, which may include striking or barring noncompliant financial pleadings as permitted by state law.

Further, Applicant respectfully requests that, **in the event further proceedings are permitted to continue in the state courts**, this Court direct that **enforcement be stayed** and that **any such proceedings be handled by the successor judge now assigned to the family court division**. Applicant does not allege bias, but submits that reassignment is appropriate to preserve the orderly administration of justice and to prevent enforcement or continuation of proceedings following orders entered during a period of procedural uncertainty and unresolved stay requests.

Respectfully submitted,



**Richard Saddler**  
Applicant, Pro Se  
413 Genoa Drive  
Manchester, MO 63021  
Phone: 310-428-2110

Date: January 6, 2026

## **APPENDIX / EXHIBIT INDEX**

### **Exhibit A**

Letter from the Clerk of the Supreme Court of Missouri dated December 29, 2025, returning Applicant's Emergency Motion for Reconsideration and Stay as unfiled and stating that no further action would be taken because the case was closed.

### **Exhibit B**

Applicant's Emergency and Expedited Motion for Reconsideration and for Stay of Enforcement tendered to the Supreme Court of Missouri in Case No. SC-101408.

### **Exhibit C**

Applicant's Written Motion to Stay Proceedings tendered to the Circuit Court of St. Louis County prior to the January 16 hearing, which was rejected/returned and not filed.

### **Exhibit D**

Applicant's Filed Motion to Stay Proceedings in the Circuit Court of St. Louis County, including certificate of service and notary acknowledgment.

# **CERTIFICATE OF SERVICE**

I hereby certify that on this **7 day of January, 2026**, I caused a true and correct copy of the foregoing **Emergency Application for a Stay and Petition for Extraordinary Relief**, together with the **Appendix (Exhibits A–D)**, to be served by **commercial carrier (FedEx)** upon the following:

**Counsel for Respondent:**

**Jack Hauser, Esq.**

Attorney for Christine Hong  
6 Westbury Drive  
St. Charles, MO 63301  
Phone: 314-740-7644  
Email: hauser@lawyer.com

Service was effected in compliance with **Rule 29 of the Rules of the Supreme Court of the United States**.

I further certify that the original and required copies of this filing were transmitted to the **Clerk of the Supreme Court of the United States** by US Post Office in accordance with the Rules of this Court.

Respectfully submitted,



**Richard Saddler**

Applicant, Pro Se  
413 Genoa Drive  
Manchester, MO 63021  
Phone: 310-428-2110



**CLERK OF THE SUPREME COURT**

**STATE OF MISSOURI**

**POST OFFICE BOX 150**

**JEFFERSON CITY, MISSOURI**

**65102**

**BETSY LEDGERWOOD**  
CLERK

**TELEPHONE**  
**(573) 751-4144**

**December 29, 2025**

**Richard Saddler**  
413 Genoa Dr  
Manchester, MO 63021

Dear Richard Saddler:

This acknowledges your Emergency & Expedited Motion for Reconsideration and for Stay of Enforcement of Financial Orders, which was received on December 29, 2025. Your submission is not in compliance with Court rules and cannot be filed at this time.

Your submission is being returned to you because this case is closed, and no further action shall be taken in this case. You may wish to review Rule 84.25(l) in regards to closed cases.

Very truly yours,

**BETSY LEDGERWOOD**

A handwritten signature in black ink, appearing to read "Betsy Ledgerwood, Clerk".

Enclosures

**IN THE SUPREME COURT OF MISSOURI**

**STATE OF MISSOURI ex rel.  
RICHARD SADDLER,  
Relator,**

v.

**THE HONORABLE MATTHEW HEARNE,  
Respondent.**

**Case No. SC101408**

**EMERGENCY & EXPEDITED MOTION FOR RECONSIDERATION  
AND FOR STAY OF ENFORCEMENT OF FINANCIAL ORDERS**

*(Rule 84.22; Inherent Supervisory Authority)*

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**INTRODUCTION**

Relator Richard Saddler respectfully moves this Court, on an **EMERGENCY** and **EXPEDITED** basis, for reconsideration of the denial of his writ petition and for an immediate stay of enforcement of financial orders entered by the circuit court.

This motion is necessary to prevent ongoing and irreparable harm caused by the enforcement of financial orders entered:

- without Rule 68.5(e) compliance,
- without counsel, and
- without access to the Relator's litigation file.

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**PROCEDURAL POSTURE (CLARIFIED)**

1. Relator's writ petition challenged the trial court's announced intent to proceed on financial matters in violation of Rule 68.5(e).
2. **Before the January 16 hearing**, Relator submitted a written Motion to Stay to the circuit court.
3. The trial judge returned the motion and denied it before the hearing began, refusing to file-stamp it.

4. The trial court then:
  - o Acknowledged Petitioner's noncompliance with Rule 68.5;
  - o Continued trial for lack of disclosures;
  - o Permitted Relator's counsel to withdraw; and
  - o Forced Relator to proceed unrepresented and without his attorney's file.
5. The court conducted the financial hearing and entered adverse rulings on Staples-related relief.
6. **Enforcement of those orders is ongoing.**

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## **EMERGENCY NATURE & JURISDICTION**

Although the hearing has occurred, the harm is **continuing, not moot**. This motion seeks to stay enforcement and implementation of orders already entered.

Financial orders entered without mandatory disclosures and without counsel create immediate consequences that **cannot be undone on appeal**.

This Court retains authority under **Rule 84.22** and its **inherent supervisory power** to:

- Prevent enforcement of void or unlawful orders;
- Preserve its jurisdiction; and
- Prevent irreparable harm.

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## **EXPRESS REQUEST FOR STAY OF ENFORCEMENT**

Relator expressly requests a **stay of enforcement, execution, and implementation** of:

- All financial orders entered as a result of the January 16 hearing; and
- Any further financial proceedings in the circuit court.

To the extent the prior writ was construed as not expressly requesting a stay, this motion cures that issue.

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## **REQUEST REGARDING JUDICIAL REASSIGNMENT**

Relator respectfully notes that Judge Hearne is in the process of being reassigned out of the family court division. Without alleging bias or impropriety, Relator requests that any stay entered by this Court remain in effect until the incoming judge assuming Division 20 is assigned this case and has the opportunity to review the matter on a clean record. This request is made solely to preserve stability, prevent further prejudice, and ensure orderly administration of justice during the judicial transition.

## **RELIEF REQUESTED**

**WHEREFORE**, Relator respectfully requests that this Court:

1. Reconsider its prior denial of writ relief;
2. Issue an immediate **stay of enforcement** of all financial orders entered as a result of the challenged hearing;
3. Stay any further financial proceedings pending disposition of the writ and Rule 68.5 compliance; and
4. Grant such other and further relief as justice requires.

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## **VERIFICATION**

I, Richard Saddler, verify under penalty of perjury that the facts stated herein are true and correct to the best of my knowledge and belief.

---

**Richard Saddler**

Respectfully submitted,

**Richard Saddler**  
Relator, Pro Se  
413 Genoa Drive  
Manchester, MO 63021  
Phone: 310-428-2110  
Email: richardsaddler@yahoo.com



IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI  
Family Court Division

STATE OF MISSOURI ex rel.  
RICHARD SADDLER,  
Respondent/Movant,

Case No.: 16SL-DR00099-04

v.

CHRISTINE HONG,  
Petitioner.

Division 20

**NOTICE OF PENDING UNITED STATES SUPREME COURT PROCEEDINGS &  
REQUEST STAY OF ALL PROCEEDINGS UNTIL FURTHER NOTICE**

COMES NOW Respondent Richard Saddler, pro se, and hereby provides notice to this Court that he has filed a Petition for a Writ of Certiorari with the Supreme Court of the United States, together with an Emergency Application for a Stay pursuant to Supreme Court Rule 22, seeking review of constitutional issues arising from the proceedings in this matter. Filed on December 15, 2025.

The filings raise substantial federal questions, including violations of procedural due process stemming from the enforcement of financially dispositive proceedings without mandatory discovery compliance and without a meaningful opportunity to obtain or prepare counsel.

Respondent provides this Notice so that the Court is apprised that review by the Supreme Court of the United States is pending and that a stay of proceedings has been requested. Respondent respectfully reserves all rights to seek further relief as appropriate based upon action taken by the Supreme Court.

**WHEREFORE**, Respondent respectfully requests that this Court take notice of the pending United States Supreme Court proceedings when considering the scheduling or disposition of any further matters in this case. Request to Stay all proceedings.

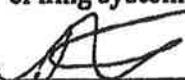


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RICHARD SADDLER  
Respondent, Pro Se  
413 Genoa Drive  
Manchester, MO 63021  
Phone: 310-428-2110  
Email: richardsaddler@yahoo.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served via the Missouri eFiling system on all counsel of record on this 15th day of December 2025.



---

RICHARD SADDLER

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI  
FAMILY COURT DIVISION

FILED

1-21-2025

CHRISTINE HONG,	)	JOAN M. GILMER
Petitioner,	)	CIRCUIT CLERK, ST. LOUIS COUNTY
	)	
v.	)	Case No. 16SL-DR00099-04
	)	
RICHARD SADDLER,	)	
Respondent.	)	Division 20

*Amended* MOTION TO STAY PROCEEDINGS

PENDING RESOLUTION OF RELATOR'S PETITION FOR WRIT OF PROHIBITION  
AND/OR MANDAMUS AND RULE 68.5 COMPLIANCE

COMES NOW Respondent/Movant, Richard Saddler ("Movant"), appearing pro se, and respectfully moves this Court

to STAY all proceedings in the above-captioned action, including all dispositive motions and any hearing on

Petitioner's "Staples"-based requests for dismissal or sanctions, pending resolution of Movant's Emergency and

Expedited Petition for Writ of Prohibition and/or Mandamus currently before the Missouri Supreme Court.

In support of this Motion, Movant states as follows:

1. Movant has filed an Emergency Petition for Writ of Prohibition and/or Mandamus raising substantial and urgent

issues, including: (a) Petitioner's complete failure to comply with Rule 68.5; (b) the trial court's refusal to

continue dispositive financial motions despite acknowledging that Petitioner has produced none of the required

financial disclosures; (c) the forced pro se posture resulting from counsel's withdrawal seven days before the

dispositive hearing; and (d) the Respondent Judge's scheduled departure from the bench in January 2026.

2. Movant's former counsel, William Dailey Jr., withdrew on December 8, 2024. The Court stated that if new counsel

could not be retained within seven days, Movant must "come prepared pro se" to litigate complex, financially

dispositive matters. Given the absence of Rule 68.5 disclosures from Petitioner, and the short notice, Movant could

not reasonably secure substitute counsel.

3. The Court continued the trial due to Petitioner's Rule 68.5 violations but declined to continue Petitioner's

Staples-based motions—despite those motions requiring accurate financial disclosure as a prerequisite.

4. Allowing the Staples motions to proceed while Petitioner remains in violation of Rule 68.5 would be legally improper,

would prejudice Movant, and would violate Missouri law requiring financial disclosure as a condition to financial

determinations.

5. A stay is necessary to prevent irreparable harm, preserve the status quo, and allow the Missouri Supreme Court to

consider the issues raised without the risk of mootness or unlawful financial rulings.

6. Good cause exists for the issuance of a stay, and no party would be prejudiced by holding the matter in abeyance

until disclosure compliance and appellate review issues are resolved.

WHEREFORE, Movant respectfully requests that this Court:

A. STAY all proceedings, including all dispositive motions and any scheduled hearings relating to Petitioner's

Staples-based requests, pending the Missouri Supreme Court's resolution of Movant's Emergency Petition for

Writ of Prohibition and/or Mandamus;

B. ORDER Petitioner to immediately re-submit full and complete Rule 68.5 disclosures, including tax returns,

bank statements, pay stubs, financial statements, and all supporting documentation;

C. DIRECT that the Court, or a neutral appointed by the Court, undertake an investigation comparing Petitioner's

newly submitted Rule 68.5 disclosures to her prior sworn disclosures from (1) the 2018 modification proceeding,

(2) the 2021 modification action, and (3) the present 2024–2025 modification case, for the purpose of identifying

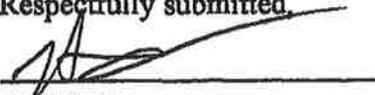
discrepancies, omissions, or potential financial misrepresentations;

D. SET a compliance review hearing or deadline requiring Petitioner to demonstrate full, accurate, and ongoing

compliance with Rule 68.5;

E. And grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

  
RICHARD SADDLER  
Respondent, Pro Se  
413 Genoa Drive  
Manchester, MO 63021  
Phone: 310-428-2110  
Email: richardsaddler@yahoo.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served via the Missouri eFiling system on all counsel of record on this 11th day of December 2025.

  
RICHARD SADDLER

Subscribed and sworn to before me this 12  
day of December, 2025  
in the County of St. Louis, State of Missouri  
  
Deboise Sharon Brown-Ware  
Notary Public

DEBOISE SHARON BROWN-WARE  
NOTARY PUBLIC - NOTARY SEAL  
STATE OF MISSOURI  
MY COMMISSION EXPIRES FEBRUARY 6, 2028  
ST. LOUIS COUNTY  
COMMISSION #24227956