IN THE
MISSOURI COURT OF APPEALS
WESTERN DISTRICT

JANE DOE I, et al.,	)	
	)	
Respondents	)	
	)	
v.	)	No. WD68066
	)	
THOMAS PHILLIPS, et al.,	)	
	)	
Appellants.	)	

APPELLANT KEATHLEY'S MOTION TO STAY
APPLICATION OF CIRCUIT COURT'S JUDGMENT PENDING APPEAL

Appellant Keathley, through counsel, moves this Court to stay application of the injunctive order issued by the trial court in this case. In support of this request, appellant Keathley states as follows:

Background. In *Doe v. Phillips*, 194 S.W.3d 833 (Mo. banc 2006), the decision in a previous appeal in this case, the Missouri Supreme Court upheld Missouri's Sex Offender Registration Act (SORA; also known as Megan's Law), §§ 589.400 to 589.425, RSMo, in all but one of the numerous constitutional challenges raised. The Court did conclude that application of SORA as to persons, but only to those persons, who were convicted or pled guilty to sex offenses prior to January 1, 1995 (SORA's effective date) would constitute a violation of the Missouri's Constitution's prohibition on retrospective laws. 194 S.W.3d. at 852-53. The Court reasoned that the prohibition on retrospective laws barred application of SORA's registration requirements to sex offenders convicted before January 1, 1995, because