financial assistance to a new professional sports stadium. Three voters, all also taxpayers, attempted to intervene to protect their right to vote. Their Motion to Intervene was denied.

<u>ISSUES EXPECTED TO BE RAISED ON APPEAL</u> (Attach one additional page, if necessary. Appellant is not bound by this list. Attach copy of post-trial motion, if one was filed.)

- 1. Whether the Trial Court erred in denying the Proposed Intervenor-Defendants' Motion for Leave to Intervene, either as of right or as permissive intervention, even though they are voters, residents and taxpayers with a direct interest in the litigation.
- 2. Whether the Trial Court erred in holding that the Ordinance in question (Chapter 391 of the Code of the City of St. Louis) was vague and was pre-empted in certain respects by state law, thus invalidating the Ordinance.
- 3. Whether the Trial Court erred in holding that the proposed new stadium would be "adjacent" to an existing convention facility pursuant to Section 67.653.1 of the Missouri Revised Statutes.

A COPY OF THIS FORM AND ATTACHMENTS MUST BE SERVED ON THE RESPONDENT.

Additional Parties Attorney

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