

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY
STATE OF MISSOURI

KISHORE VARLAGADDA, et al.,)
)
Plaintiffs,)
) No. 24SL-CC00751
VS.)
)
SATYA GUDIVADA, et al.,)
)
Defendants.)

PLAINTIFFS' APPLICATION FOR A RESTRAINING ORDER TO ENJOIN
IRREGULAR PROCEEDINGS

COME NOW Plaintiffs and state as follows:

1. Plaintiffs brought this action in part to address ongoing financial irregularities by those operating India Association of St. Louis ("IAS") and to compel IAS to schedule a general body meeting and elect directors, all as required by the IAS Constitution and Bylaws, and as more particularly set forth in Count II of the Amended Petition. IAS refused to schedule a general body meeting and elect directors, despite its clear obligation to do so, and Plaintiffs filed a Motion for Partial Summary Judgment as to Count II.

2. On May 26, 2026, the Court entered Judgment on Count II of Plaintiffs' Amended Petition, ordering, among other things:

- That the Constitution and Bylaws approved December 4, 2022 constitute the operative IAS Constitution and Bylaws (Judgment, ¶2)
- That IAS schedule a general body meeting pursuant to the Bylaws (Judgment, ¶B)
- That IAS elect 9 directors

- That the members present at the general body meeting shall constitute a quorum, and a majority vote of those present shall be sufficient to elect a director (Judgment, ¶E)

- Awarding Plaintiffs their fees and costs

3. Since the entry of the Court's Judgment, IAS scheduled the general body meeting and election for July 25, 2026. IAS then sent nomination forms to the membership seeking nominations, directing that the nominations be received on or before July 1, 2026 by registered mail, despite the fact that the bylaws direct the election committee to determine whether nominations were "postmarked" before the due date, not received.

4. IAS physically received 17 completed nominations.

5. When IAS threatened to disregard all but the nominations of preferred candidates,

Plaintiffs filed an emergency motion.

6. On July 14, 2026, counsel appeared before the Honorable Judge Ott to hear Plaintiffs' emergency motion. After considerable argument, Judge Ott ordered the election to proceed with following 16 nominees:

Sridhar Nhakikudi
Haridas Krthna
Pandu Ranga Rao Koya
Sharat Rao
Sridhar Kothamasu
Jayprakash Patel
R. K. Daggumati
Nanda Kishore Rai
Mahendr Gunnapooti
Raghvan Rajagopalan
Veerabhararao DaSari
Pravin Pachbhai
Vijay Sakshi
Manhar Bhakta
Krishna Bayyareddy

Dr. Naveen Krishna¹

Judge Ott asked counsel to prepare and provide the Court with a proposed Order reflecting that ruling.

7. When Plaintiffs' counsel provided a proposed Order to IAS counsel, IAS counsel advised that IAS intended to strike additional nominees from the list ordered by Judge Ott.

8. IAS has *now* indicated that no election is necessary because it has determined that there are only 9 eligible nominees for the 9 positions. It likely will not come as a surprise to the Court that those 9 individuals are the 9 preferred by IAS. None of Plaintiffs' nominees have made the cut.

9. IAS's most recent pronouncement is exactly what the Court sought to prevent by its July 14 ruling—IAS's arbitrary elimination of any nominee who might be seen to oppose the current regime (presumably to avoid any meaningful examination of the alleged financial irregularities).

10. Plaintiffs and the IAS membership are entitled to a fair and equitable election. Plaintiffs have no adequate remedy at law absent the Court's intervention and will suffer irreparable harm if IAS is allowed to proceed with an "election" under these circumstances and contrary to Judge Ott's prior determination. Such a result will potentially leave Plaintiffs (and the membership) without any ability to investigate potential financial irregularities and/or the ability to direct the future direction and operation of IAS.

WHEREFORE, Plaintiffs request that the Court enter its temporary restraining order enjoining any election of directors until the Court is able to fully and finally adjudicate Director

¹ Plaintiffs do not and did not agree that this is a complete list of eligible nominees, but Plaintiffs were prepared to abide the Court's ruling.

nominations and the proper voting process, awarding Plaintiffs their fees and costs and order such other relief as the Court deems proper

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the aforementioned was served via the Court's electronic filing system on the 22nd day of July, 2026

/s/ Paul J. Puricelli

VERIFICATION

COMES NOW Plaintiff Kishore Yarlagadda, after being duly sworn, who states that he has read the foregoing Application and the factual statements contained therein are true and accurate.

Kishore
Kishore Yarlagadda

Subscribed and sworn to before me this 22nd day of July, 2026.

Christopher Meyer
Notary Public

My commission expires: 3-29-30

