

IN THE SEVENTH JUDICIAL DISTRICT
DOUGLAS COUNTY DISTRICT COURT
CIVIL DEPARTMENT

DANIEL DOE and MATTHEW MOE,

Plaintiffs,

v.

STATE OF KANSAS, *ex rel* KRIS
KOBACH, Attorney General; KANSAS
DEPARTMENT OF REVENUE, KANSAS
DIVISION OF VEHICLES; DEANN
WILLIAMS, Director of Vehicles,
Department of Revenue, in her official
capacity; MARK BURGHART, Secretary of
Kansas Department of Revenue, in his official
capacity; KANSAS DEPARTMENT OF
ADMINISTRATION; and ADAM PROFFIT,
Secretary of Department of Administration, in
his official capacity,

Defendants.

Case No. _____
Div. No. 7

PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER
FOLLOWED BY TEMPORARY INJUNCTION

Plaintiffs move the Court pursuant to K.S.A. § 60-903 for a temporary restraining order and K.S.A. § 60-905 for a temporary injunction. As a result of SB 244 going into effect on Thursday, February 26, 2026, Plaintiffs are in immediate danger of incurring civil and criminal penalties merely by using their driver's licenses and using restrooms in government buildings, both of which are essential to their continued livelihoods and ability to participate in civil society.

Only a temporary restraining order, followed by a temporary injunction, will prevent this irreparable harm.

The reasons and authority in support of this Motion are set forth in the accompanying Brief In Support Of Plaintiffs' Motion.

Plaintiffs intend to provide copies of the Complaint, this Motion, as well as their other contemporaneously filed documents, to Defendants via email to provide actual notice. Plaintiffs will attempt to effect service at the earliest possible time.

Plaintiffs respectfully request a hearing on their Motion for Temporary Restraining Order on Friday, February 27, or as soon as possible thereafter.

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**Pro hac vice forthcoming*

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