

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 BURGART, 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 TO EXCEED PAGE LIMITS

Plaintiffs Daniel Doe and Matthew Moe (collectively, "Plaintiffs"), by and through their undersigned counsel, respectfully move this Court for permission to exceed the page limit set forth in the Douglas County District Court Local Rule No. 15 for their briefing in support of their Motion for a Temporary Restraining Order / Temporary Injunction. In support of this motion, Plaintiffs state as follows:

1. Plaintiffs concurrently file with this Motion their briefing in support of their Motion for a Temporary Restraining Order / Temporary Injunction.

2. The Douglas County District Court's Local Rule 15 provides a 20-page limit for all motion briefs other than those in support of motions for summary judgment, to dismiss, and for judgment on the pleadings.

3. Plaintiffs request up to seventeen (17) additional pages for their brief in support of their Motion, excluding attachments and exhibits, for a total brief length of thirty-seven (37) pages.

4. Additional pages are warranted here. The relevant statute which Plaintiffs are challenging contains several distinct provisions, and Plaintiffs raise multiple claims under the Kansas Constitution alleging violations of personal autonomy, informational privacy, equality under the law, due process, and freedom of speech, as well as a violation of the Kansas Constitution's single subject rule. Plaintiffs require additional pages to adequately articulate their entitlement to temporary relief on these claims.

5. Pursuant to Douglas County District Court Local Rule 15(C)(3), Plaintiffs respectfully request that the Court allow an additional 17 pages for their contemporaneously filed briefing in support of their Motion for a Temporary Restraining Order / Temporary Injunction, for a total of 37 pages, excluding attachments and exhibits, in order to fully apprise the Court of the facts and law which support Plaintiffs' claims.

WHEREFORE Plaintiffs respectfully request the Court enter an order allowing an additional 17 pages for their briefing in support of their Motion for a Temporary Restraining Order / Temporary Injunction for a total of 37 pages, excluding attachments and exhibits.

Respectfully submitted, this 26th day of February, 2026

By: /s/ Doug Dagleish

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**Pro hac vice forthcoming*

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that on February 26, 2026, the above and foregoing were electronically filed with the Clerk of the Court using the Court's Electronic Filing System, which will send notice of electronic filing to all counsel of record.

/s/ Doug Dagleish

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