

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 LEAVE TO PROCEED UNDER PSEUDONYM

Plaintiffs, by and through their undersigned counsel, respectfully move this Court for an order allowing them to proceed in this action pseudonymously. Plaintiffs submit the following brief in support of this Motion. As set forth below, Plaintiffs have significant privacy interests in remaining anonymous throughout this litigation. These privacy interests relate to their safety and welfare.

A proposed order granting the Motion is attached as Exhibit A.

WHEREFORE, Plaintiffs respectfully request that this Court grant their Motion to proceed pseudonymously in this case.

Dated: February 26, 2026

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**Pro hac vice forthcoming*

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