

IN THE SEVENTH JUDICIAL DISTRICT  
DOUGLAS COUNTY DISTRICT COURT  
CIVIL DEPARTMENT

DANIEL DOE, MATTHEW MOE, KYLE  
KOE, NICHOLAS NOE, CAMERON  
BROYLES, and DAKOTA WEST,

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  
PROFFITT, Secretary of Department of  
Administration, in his official capacity,

Defendants.

Case No. DG-2026-CV-000112  
Div. No. 4

**PLAINTIFFS KOE AND NOE'S MOTION FOR LEAVE TO PROCEED UNDER  
PSEUDONYMS**

Plaintiffs Kyle Koe and Nicholas Noe, 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 Koe and Noe respectfully request that this Court grant their Motion to proceed pseudonymously in this case.

Dated: April 3rd, 2026

By: */s/ Doug Dalglish*

Doug Dalglish, KS Bar 22328  
**STINSON LLP**  
1201 Walnut Street  
Suite 2900  
Kansas City, MO 64106  
Tel: (816) 961-3122  
[doug.dalglish@stinson.com](mailto:doug.dalglish@stinson.com)

Monica Bennett, KS Bar 30497  
**AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF KANSAS**  
10561 Barkley St., Suite 500  
Overland Park, KS 66212  
Tel: (913) 303-3641  
Fax: (913) 490-4119  
[mbennett@aclukansas.org](mailto:mbennett@aclukansas.org)

**AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION**

Harper Seldin\*  
125 Broad St.  
New York, NY 10004  
[hseldin@aclu.org](mailto:hseldin@aclu.org)

Julie A. Murray\*  
Aditi Fruitwala\*  
Dena Robinson\*  
Eleanor Matheson\*\*  
915 15<sup>th</sup> Street NW  
Washington, DC 20005  
[jmurray@aclu.org](mailto:jmurray@aclu.org)  
[afruitwala@aclu.org](mailto:afruitwala@aclu.org)  
[drobinson@aclu.org](mailto:drobinson@aclu.org)  
[ematheson@aclu.org](mailto:ematheson@aclu.org)

Lillian Moore-Eissenberg\*  
425 California Street, Suite 700  
San Francisco, CA 94104  
[lmoore-eissenberg@aclu.org](mailto:lmoore-eissenberg@aclu.org)

**BALLARD SPAHR LLP**

Jason Leckerman\*  
Elizabeth Lilly\*  
1735 Market Street, 51st Floor  
Philadelphia, PA 19103-7599  
(215) 864-8266  
[leckermanj@ballardspahr.com](mailto:leckermanj@ballardspahr.com)  
[lillye@ballardspahr.com](mailto:lillye@ballardspahr.com)

Heather St. Clair\*  
601 SW 2nd Ave #2100  
Portland, OR 97204  
(503) 778-2100  
[stclairh@ballardspahr.com](mailto:stclairh@ballardspahr.com)

Jocelyn Sitton\*  
1800 Larimer Street, Suite 1600  
Denver, CO 80202  
(303) 299-7353  
[sittonj@ballardspahr.com](mailto:sittonj@ballardspahr.com)

Antonia Gales\*  
1301 2nd Ave #2800  
Seattle, WA 98101  
(206) 223-7000  
[galesa@ballardspahr.com](mailto:galesa@ballardspahr.com)

\**Pro hac vice* motion granted  
\*\**Pro hac vice* motion forthcoming

ATTORNEYS FOR PLAINTIFFS