

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' RENEWED MOTION FOR TEMPORARY INJUNCTION

Plaintiffs move the Court pursuant to K.S.A. § 60-905 for a temporary injunction. As set forth in Plaintiffs' accompanying brief, SB 244 violates Plaintiffs' individual rights under Section 1 and Section 2 of the Kansas Bill of Rights, as well as Article II, Section 16 of the Kansas Constitution. As a result of SB 244 going into effect on Thursday, February 26, 2026, Plaintiffs are experiencing constitutional, dignitary, and actual harms from the law's requirement that they

use driver's licenses revealing their transgender or intersex status and the law's criminal prohibition against their use of restrooms in government buildings on the same terms as other men and women. There is no adequate remedy at law for these injuries, and only a temporary injunction will prevent further irreparable harm. An injunction is in the public interest.

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

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