

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

| | | |
|-------------------------------|---|--------------------------|
| KYLE LAWSON, et al., |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | 4:14-cv-00622-ODS |
| |) | |
| ROBERT KELLY, et al., |) | |
| |) | |
| Defendant/Intervenors. |) | |

**MOTION FOR JUDGMENT
ON THE PLEADINGS**

Intervenor State of Missouri, by and through the Missouri Attorney General in his official capacity, moves this Court for judgment on the pleadings, and states in support as follows:

1. Defendant Robert Kelly, Director of the Jackson County Recorder of Deeds, and Intervenor, the State of Missouri by and through the Missouri Attorney General in his official capacity, have answered Plaintiffs' complaint.

2. "Judgment on the pleadings is appropriate where no material issue of fact remains to be resolved and the movant is entitled to judgment as a matter of law." *Faibisch v. Univ. of Minn.*, 304 F.3d 797, 803 (8th Cir. 2002).

3. As set forth in the accompanying suggestions in support, incorporated herein by this reference, Defendant/Intervenors are entitled to judgment as a matter of law.

Wherefore, Intervenor State of Missouri, by and through the Missouri Attorney General in his official capacity, requests this Court grant judgment on the pleadings and all other relief the Court deems appropriate.

Respectfully submitted,

/s/ Jeremiah J. Morgan

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**ATTORNEY FOR THE STATE OF
MISSOURI, BY AND THROUGH THE
MISSOURI ATTORNEY GENERAL IN
HIS OFFICIAL CAPACITY**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically via the Court's CM/ECF system, this 5th day of August, 2014, to:

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