

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS

KANSAS APPELSEED CENTER FOR
LAW AND JUSTICE, INC.; LOUD
LIGHT; and DISABILITY RIGHTS
CENTER OF KANSAS,

Plaintiffs,

v.

Case No. 2:25-cv-02375-JWB-GEB

SCOTT SCHWAB, in his official capacity
as the Kansas Secretary of State; and
JAMIE SHEW, in his official capacity as
the Douglas County Clerk,

Defendants.

**DEFENDANT SCOTT SCHWAB'S MOTION TO DISMISS
FOR FAILURE TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED**

Defendant Scott Schwab, in his official capacity as the Kansas Secretary of State, moves to dismiss Plaintiffs' Complaint (originally denominated a Petition since the case was filed in state court) for failure to state a claim upon which relief can be granted. A memorandum in support of this motion is being simultaneously herewith.

Respectfully Submitted,

By: /s/ Bradley J. Schlozman
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CERTIFICATE OF SERVICE

I certify that on July 18 2025, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the e-mail addresses on the electronic mail notice list.

By: /s/ Bradley J. Schlozman