

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF KANSAS,

Defendant.

Civil No. 5:26-cv-04066

**JOINT MOTION FOR ENTRY OF
CONSENT JUDGMENT**

1. On June 24, 2026, Plaintiff filed its Complaint against Defendant the State of Kansas. ECF No. 1.

2. The Parties agree that the Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345 and venue is proper under 28 U.S.C. § 1391.

3. In the Complaint, Plaintiff challenged Kan. Stat. Ann. § 76-731a as expressly preempted by federal immigration law at 8 U.S.C. § 1623.

4. Plaintiff requested that this Court enter a judgment declaring that Kan. Stat. Ann. § 76-731a, is preempted by federal law and is therefore invalid.

5. Plaintiff further requested that this Court issue a permanent injunction that prohibits the State of Kansas, as well as its officers, agents, servants, employees, and attorneys, and those in active concert or participation with them, from enforcing Kan. Stat. Ann. § 76-731a.

6. Plaintiff and Defendant agree that the Court has the authority to provide the requested relief under the Supremacy Clause, U.S. Const. Art. VI, cl. 2, as well as 28 U.S.C. §§ 1651, 2201, and 2022, and its inherent equitable powers.

7. Plaintiff and Defendant agree that Kan. Stat. Ann. § 76-731a is preempted by 8 U.S.C. § 1623.

8. Plaintiff and Defendant request that the Court enter a final judgment declaring that Kan. Stat. Ann. § 76-731a is preempted by 8 U.S.C. § 1623 and is therefore invalid.

9. Plaintiff and Defendant request that the Court enter a permanent injunction prohibiting the State of Kansas as well as its officers, agents, servants, employees, and attorneys, and those in active concert or participation with them, from enforcing Kan. Stat. Ann. § 76-731a.

10. Plaintiff and Defendant agree that each will bear their own costs and fees.

11. A proposed order will be filed concurrently for the Court's convenience.

[remainder of page intentionally left blank; signatures to follow]

DATED: June 24, 2026

STANLEY E. WOODWARD, JR.
Associate Attorney General

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

ANNA EDWARDS
Counsel to the Associate Attorney General

SEAN SKEDZIELEWSKI
Counsel to the Assistant Attorney General
Civil Division

RYAN A. KRIEGSHAUSER
United States Attorney
District of Kansas

CHRISTOPHER ALLMAN
Assistant United States Attorney
Chief, Civil Division
District of Kansas

ALEXANDRA MCTAGUE
Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Enforcement & Affirmative Litigation Branch

s/ Jackson M. Story
Jackson M. Story (FL 1032001)
Trial Attorney
U.S. Department of Justice, Civil Division
Enforcement & Affirmative Litigation Branch
P.O. Box 386
Washington, DC 20044-0386
Phone: (202) 451-7304
Fax: (202) 514-8742
Email: jackson.m.story@usdoj.gov

Attorneys for the United States

Respectfully Submitted,

s/ Kris W. Kobach
KRIS W. KOBACH, #17280
Kansas Attorney General

DWIGHT R. CARSWELL, #25111
Deputy Solicitor General

JAMES R. RODRIGUEZ, #29172
Deputy Attorney General

Office of the Kansas Attorney General
120 S.W. 10th Ave., 2nd Floor
Topeka, KS 66612-1597
Tel: (785) 296-2215
Fax: (785) 296-6296
Email: Kris.Kobach@ag.ks.gov
Dwight.Carswell@ag.ks.gov
Jay.Rodriguez@ag.ks.gov

Attorneys for the State of Kansas