

3. Mr. Schwab has not destroyed any abstracts of voting records; and,
4. Plaintiff lacks standing to assert a violation of K.S.A. 25-2709.

The arguments and authorities in the Memorandum in Support of Motion for Summary Judgment, filed contemporaneously with this motion, are incorporated here.

Oral argument is not requested.

Respectfully Submitted,

/s/ Garrett Roe

GARRETT ROE #26867

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on the 14th day of May, 2021, I caused a copy of the foregoing to be filed on the Court's electronic filing system and further that I caused a copy to be served on opposing counsel via e-mail.

/s/ Garrett Roe_____

Garrett Roe, Kansas No. 26867

Attorney for Defendant