

**IN THE STATE COURT OF KANSAS  
DISTRICT COURT OF SHAWNEE COUNTY**

LEAGUE OF WOMEN VOTERS OF KANSAS,  
LOUD LIGHT, KANSAS APPLESEED  
CENTER FOR LAW AND JUSTICE, INC.,  
TOPEKA INDEPENDENT LIVING RESOURCE  
CENTER,

Plaintiffs,

v.

SCOTT SCHWAB, in his official capacity as  
Kansas Secretary of State, and KRIS KOBACH, in  
his official capacity as Kansas Attorney General,

Defendants.

Original Action No. 2021-CV-000299

**AMENDED PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR ENTRY OF A  
CASE MANAGEMENT ORDER**

Almost two years ago, the Court of Appeals held that Plaintiffs had standing to litigate their challenges to the Signature Verification Requirement. *See League of Women Voters v. Schwab*, 63 Kan.App.2d 187, 204, 525 P.3d 803, 819 (Kan. App. 2023).<sup>1</sup> And by remanding to this Court to give Plaintiffs “their full opportunity to prove up” these claims “as a matter of evidence,” the Supreme Court necessarily concluded Plaintiffs had standing to litigate them. *See League of Women Voters v. Schwab*, 318 Kan. 777, 807, 549 P.3d 363, 384 (2024). The Attorney General admitted this when he appeared before the Supreme Court in this case.<sup>2</sup>

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<sup>1</sup> Specifically, and relevant to Plaintiffs’ remaining claims, that court found: “Plaintiffs have alleged that they encourage advance voting and that they will have to divert resources from their other voter assistance activities to ballot cure programs to prevent voters from being disenfranchised by the new signature matching requirement. These are sufficient allegations to establish their standing . . . .” *Id.*

<sup>2</sup> A transcript of this argument was filed as Exhibit 1 to Plaintiffs’ opposition to Defendants’ renewed motion to dismiss. The relevant exchange is on pages 30-31, where Justice Rosen notes to Attorney General Kris Kobach that “[t]he court of appeals in their decision did a pretty lengthy” standing analysis, which the State didn’t oppose in its petition for review.” Ex. 1 at 30:15-21. The Attorney General acknowledged that the State “didn’t really brief” the issue, but stated: “we assumed the court would assess its own jurisdiction at each phase.” *Id.* at 30:22-31:4.

There is no good reason for this Court to ignore the directives of these higher courts, and— instead of allowing Plaintiffs to prove their claims—dismiss them for lack of jurisdiction. *See generally* Pls’ Opp. to Renewed MTD. Similarly without basis are the State’s attempts to thwart Plaintiffs’ ability to engage in discovery with arguments that are reliant, first, on the State’s renewed motion to dismiss and, second, on unsupported and premature claims of undue burden or relevance. The Court should grant Plaintiffs’ motion for a case management order, so that this matter may proceed as the Supreme Court anticipated it would when it remanded it seven months ago, in May 2024.

Discovery is not premature. The State’s argument is based entirely on its renewed motion to dismiss, which hinges on a U.S. Supreme Court decision that does nothing to disturb the applicable standards for evaluating standing in Kansas courts. *See Food and Drug Admin. v. All. for Hippocratic Medicine*, 602 U.S. 367, 382 (2024) (outlining the requirements “to sue in federal court”). Moreover, the Kansas Supreme Court has repeatedly disavowed binding reliance on the federal standard for assessing standing, including in this very case. *See, e.g., League of Women Voters of Kansas v. Schwab*, 317 Kan. 805, 813, 539 P.3d 1022, 1028 (2023) (“The test for standing in Kansas differs from the federal standard.”).<sup>3</sup> Nor is there any basis to disregard the binding conclusions of the Court of Appeals and the Supreme Court as to Plaintiffs’ standing, including the latter’s unequivocal mandate that Plaintiffs are entitled to a “full opportunity to prove up” their challenges to the Signature Verification Requirement, *League of Women Voters*, 318 Kan. at 807 (2024)—an opportunity that they have been pursuing for more than three years.

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<sup>3</sup> The *Hippocratic Medicine* case also had nothing to say about standing based on injuries to an organization’s members, a separate basis for standing for the membership organizations in this case. *See, e.g., Pls’ Opp. to Renewed MTD* at 7, 11–15.

Although Plaintiffs' entitlement to pursue their remaining claims is abundantly clear, the State baselessly insists that, "[u]ntil the Court issues its ruling on Defendants' standing-grounded motion to dismiss . . . any discovery would be needlessly burdensome on the State and potentially irrelevant and wasteful." Mot. at 2. Yet, just pages later, the State claims it *already knows* how many ballots were rejected due to signature matching during the 2024 primary, *see id.* at 5, indicating it has readily available much of the data that it argues will be "burdensome" to produce. In reality, discovery in this case will be fairly limited, both because the parties have considerably narrowed the issues in this case following the resolution of Plaintiffs' claims challenging K.S.A. 25-2438 (a)(2) and (a)(3), and because the State and county election officials are required by state law and the Secretary's own implementing regulation to create and maintain much of the universe of discoverable information in this case. *See, e.g.*, § 7-36-9(c), (f).

If, in attempting to respond to Plaintiffs' specific discovery requests, the State finds that any request is in fact unduly burdensome or seeks information that is irrelevant under the Kansas rules, the appropriate vehicle to raise such objections is with opposing counsel in the first instance. *See* K.S.A. 60-233(b)(2), 60-234(b)(2), 60-236(a)(5). In doing so, the State must be specific and provide some basis for its objections. *See Kansas Medical Mut. Ins. Co. v. Svaty*, 291 Kan. 597, 244 P.3d 642, 648 (2010) (explaining "a party . . . objecting to discovery on the grounds of undue burden or expense must meet the burden of showing not only undue burden or expense, but that the burden or expense is unreasonable in light of the benefits to be secured from the discovery" and "must provide precise reasons for the objection"); *see also id.* at 632 (declining to conclude discovery is irrelevant where objections contained a "lack of specificity"). Only if the parties cannot resolve those objections, would it then be appropriate to raise them with the Court. *See, e.g.*, K.S.A. 60-226(c)(1) (allowing party from whom discovery is sought to move for a protective

order after good faith efforts to confer to try to resolve dispute and setting forth limited bases upon which court may grant such an order). In other words, it is the State’s generalized claims that responding to discovery in the abstract will be burdensome or require it to produce irrelevant information, that is premature, not Plaintiffs’ request that they be permitted to proceed with discovery.

The Court should similarly reject the State’s attempts to minimize the stakes in this case, first, by suggesting the issues presented are unimportant, and second, by arguing that an insignificant number of voters have been disenfranchised as a result of the Signature Verification Requirement. When the State sought to obtain the Supreme Court’s review of its appeal from the Court of Appeals’ decision in this matter, it stressed the importance of the issues that this case raises, and those courts clearly agreed. *See, e.g.*, Defs.’ 04-05-2023 Pet. for Review at 1 (asserting this case “presents issues of first impression on matters of extremely significant public importance”); *id.* at 14 (recognizing that right to vote by mail is an “important interest[.]”); *see also League of Women Voters*, 63 Kan. App. 2d at 198 (“The constitutional rights at issue are important to all Kansans”). As for the State’s assertion that the number of rejected ballots has not been overwhelming thus far, Plaintiffs are clearly entitled to test that assertion.<sup>4</sup> But even more importantly, the State’s focus on the raw numbers of rejected ballots is at odds with the Kansas Supreme Court’s opinion, which makes clear that is *not* the operative question in this case. To the

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<sup>4</sup> The picture the State paints appears to be incomplete. First, it focuses entirely on mismatched signatures, and does not include ballots rejected due to a missing signature—although those voters are entitled to notice and an opportunity to cure to avoid rejection. It also is not clear that it includes all counties. While the State claims that 105 ballots were rejected due to a signature mismatch in the 2022 General Election, Mot. at 5, the counties that filled out the 2022 Election Administration and Voting Survey reported a higher number of rejected ballots—and that does not include data from several Kansas Counties. *See* EAVS 2022 Data Interactive, United States Election Assistance Commission Election Administration and Voting Survey, [https://www.eac.gov/sites/default/files/2023-10/EAVS\\_2022\\_Data\\_Interactive\\_Raw\\_Data.xlsx](https://www.eac.gov/sites/default/files/2023-10/EAVS_2022_Data_Interactive_Raw_Data.xlsx) (showing that *at least* 129 ballots were rejected during the 2022 general election for missing or mismatched signature and that data is lacking for Bourbon, Cherokee, Jewell, Osage, Pratt, and Stafford counties).

contrary, that Court held that the Signature Verification Requirement can only be upheld if it is proven that it can be “applied with reasonable uniformity upon objective standards so that **no voter** is subject to arbitrary and disparate treatment.” Op. at 35 (emphasis added). As a result, the ultimate question that this Court will have to answer is not how many ballots have been rejected, but whether the State’s standards are sufficiently objective such that *any* Kansas voter whose ballot is flagged for rejection is not being subject to arbitrary and disparate treatment. Discovery is accordingly critically necessary to examine the law’s viability.

Finally, there is nothing improper about Plaintiffs’ motion. There is no stay of discovery in this case, nor has the State moved for one. The only substantive basis that the State has offered to delay discovery is its claim that Plaintiffs lack standing to pursue a claim that the Kansas Supreme Court has directed this Court to try on the merits. *But see State v. Kleypas*, 305 Kan. 224, 297 (2016) (“Kansas cases have not recognized the power of a district court to unilaterally depart from the mandate, even when a change of law has occurred”). Plaintiffs have acted with every reasonable urgency to prosecute this case—which was now brought over three years ago—having sought to enter a case management order and serve discovery just as data from the November election would have become available for production.

Plaintiffs therefore respectfully request that the Court enter their proposed Case Management Order.<sup>5</sup>

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<sup>5</sup> When Plaintiffs filed their motion, they submitted a proposed order contemplating discovery beginning in January. *See* Index #18. In light of the Court’s scheduling of a hearing on the State’s pending renewed motion to dismiss in February, Plaintiffs now submit a revised proposed Case Management Order, attached hereto as Exhibit A. This proposed schedule would allow for resolution of this case and any subsequent appeals before the next major election cycle, following the February hearing.

Respectfully submitted, this 26 day of December, 2024.

/s/ Jason A. Zavadil

Pedro L. Irigonegaray (#08079)

Nicole Revenaugh (#25482)

Jason Zavadil (#26808)

**IRIGONEGARAY &  
REVENAUGH LLP**

1535 S.W. 29th Street

Topeka, KS 66611

(785) 267-6115

[pedro@itrlaw.com](mailto:pedro@itrlaw.com)

[nicole@itrlaw.com](mailto:nicole@itrlaw.com)

[jason@itrlaw.com](mailto:jason@itrlaw.com)

*Counsel for Plaintiffs*

Elisabeth C. Frost\*

Marisa A. O'Gara\*

**ELIAS LAW GROUP LLP**

250 Massachusetts Ave. NW, Suite 400

Washington, DC 20001

(202) 968-4490

[efrost@elias.law](mailto:efrost@elias.law)

[mogara@elias.law](mailto:mogara@elias.law)

*Counsel for Loud Light, Kansas Appleseed Center for  
Law and Justice, and the Topeka Independent Living  
Resource Center*

David Anstaett\*

**PERKINS COIE LLP**

33 East Main Street, Suite 201

Madison, WI 53703

(608) 663-5408

[danstaett@perkinscoie.com](mailto:danstaett@perkinscoie.com)

*Counsel for League of Women Voters of Kansas*

Teresa A. Woody (#16949)

**KANSAS APPLESEED CENTER  
FOR LAW AND JUSTICE, INC.**

211 E. 8<sup>th</sup> St., Suite D

Lawrence, KS 66044

(785) 251-8160

[twoody@kansasappleseed.org](mailto:twoody@kansasappleseed.org)

*Counsel for Kansas Appleseed Center  
For Law and Justice, Inc.*

*\*Appearing Pro Hac Vice*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 26, 2024, a true and correct copy of the above document was electronically filed with the Clerk of the Court using the Court's electronic filing system, which will send notice of electronic filing to all registered participants.

/s/ Jason A. Zavadil

Jason A. Zavadil

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Exhibit A

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**IN THE STATE COURT OF KANSAS  
DISTRICT COURT OF SHAWNEE COUNTY**

LEAGUE OF WOMEN VOTERS OF KANSAS,  
LOUD LIGHT, KANSAS APPLESEED  
CENTER FOR LAW AND JUSTICE, INC., and  
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Plaintiffs,

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SCOTT SCHWAB, in his official capacity as  
Kansas Secretary of State, and KRIS KOBACH, in  
his official capacity as Kansas Attorney General,

Defendants.

Original Action No. 2021-CV-000299

**[PROPOSED] CASE MANAGEMENT  
ORDER**

After consultation with the parties, the Court enters the following Case Management Order for *League of Women Voters of Kansas, et al. v. Scott Schwab, et al.*, 2021-CV-0299, currently pending before this Court.

1. The parties will exchange lists of proposed non-expert witnesses (“fact witnesses”). These lists of fact witnesses shall set contact information for each witness, as well as the subject matter, and a brief synopsis of the substance of the facts to which each witness is expected to testify. The parties’ initial lists of proposed fact witnesses shall be served by **Friday, March 7, 2025**. The parties shall supplement this list to add any additional witnesses identified in advance of trial and before the close of discovery and, in any case, by no later than **Monday, June 2, 2025**.

- a. Whether K.S.A. 25-1124(h) and its implementing rules and regulations (the “Signature Verification Requirement”) violates equal protection under Section 2 of the Kansas Constitution Bill of Rights
- b. Whether the Signature Verification Requirement violates due process under Section 18 of the Kansas Constitution Bill of Rights

- c. Whether K.S.A. 25-2438(a)(2)–(3) (the “Conduct of an Election Official” provision) violates free speech and associational rights under Section 11 of the Kansas Constitution Bill of Rights
- d. Whether the Conduct of an Election Official provision is void for vagueness under the Kansas Constitution
- e. Whether the Conduct of an Election Official provision is unconstitutionally overbroad under the Kansas Constitution

2. The parties will confer as to whether they may be able to agree to any stipulations.

They agree to exchange drafts of proposed stipulated facts by no later than **Friday, June 20, 2025**, and finalize the parties’ agreed-to stipulated facts before summary judgment by no later than **Monday, June 30, 2025**. The parties will submit these and any later-agreed to stipulated facts to the Court no later than **one week before trial**.

3. Alternative dispute resolution is not appropriate for this case.

4. The Plaintiffs shall provide their disclosures pertaining to expert witnesses required by K.S.A. 60-226(b)(6), DCR 3.211, and this Court’s standard interrogatories and requests for production no later than **Monday, May 5, 2025**. The Defendants will provide the same information pertaining to expert witnesses by **Monday, June 2, 2025**. For the avoidance of doubt, the parties shall disclose the following information regarding experts:

- a. A copy of the expert’s current and up-to-date CV setting forth the qualifications of the expert and identifying all published and unpublished writings of the expert pertaining to the expert’s opinions in the case. [DCR 3.211(3)]
- b. A written report signed by the expert that contains a complete statement of all opinions to be expressed and the bases and reasons therefore. If the expert’s opinions are based on calculations, and/or mathematic statistic, economic, or other assumptions, the expert’s report shall disclose in the report all calculations and assumptions the expert made or relied upon in forming opinions. The source of each assumption and/or the manner in which each assumption was derived shall be specifically explained. Any calculations shall be completely shown, except when done using a specific computer program, in which case the specific program must be identified and each input made by

the expert into the computer calculation shall be specifically set forth. [DCR 3.211(3), (4)]

- c. Identify and provide copies of all other data, writings or exhibits upon which the expert relies upon to support his or her opinions in the case.<sup>1</sup> [DCR 3.211 (3)]
  - d. The hourly rate the expert is being paid for their work in the case. [DCR 3.211(4)]
  - e. All billing statements or documents evidencing the amount of money billed and the amount of time the expert has spent providing services in the case prior to the disclosure. [DCR 3.211(4)]
  - f. A copy of each deposition given by each expert retained relating to the subject matter of this litigation. [Court's standard Requests for Production]
5. Discovery can commence starting on the day this case management order is signed.

This case is subject to the deposition-related limits set forth in DCR 3.201, except that depositions of party-designated experts shall be allowed beyond the four-depositions-per-party limit, and depositions of any non-party election officials shall be subject to a four-hour limit, rather than the two-hour limit ordinarily applicable to non-party depositions. The parties will work together to schedule depositions to be taken up until the close of discovery and need not schedule the depositions of the parties within 90 days of this scheduling order, to guard against having to call a party back for a deposition if more information is learned during the course of discovery that could be relevant to their deposition.

6. All discovery shall close on or before **Thursday, June 26, 2025**.

7. The following procedure shall be used by the parties in the disclosure or discovery of electronically stored information, including the form or forms in which it is to be produced:

**BATES NUMBERING:** All documents are to be sequentially Bates numbered. Multi-page

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<sup>1</sup> Published writing may be identified by citation and need not be physically produced. Copies of the expert's unpublished writings shall be timely furnished upon request.

documents must bear a sequential Bates number on every page. Bates numbers should be placed in the lower right corner of the pages. To the extent practicable, the Bates number must not obliterate, conceal, or interfere with any information from the source document. Confidentiality designations, if any, will be located on the bottom left of each page.

**PRODUCTION FORMAT:** Wherever practicable, documents that contain any color should be imaged and produced in a full-color PDF format with a corresponding load file with related searchable text, metadata, and bibliographic information. Wherever practicable, bitonal documents should be imaged and produced in a PDF format, with a corresponding load file containing related searchable text, metadata, and bibliographic information.

**NATIVE FILES:** If a native file type is not conducive to imaging because of file type (e.g., .xlsx), those files should be produced in their native format, along with a PDF “placeholder” indicating and assigning a Bates number, and the Bates number should be included in the file name to the native file.

**PASSWORD PROTECTED DOCUMENTS:** Wherever possible, passwords and encryption must be removed from electronic documents before production.

**HIDDEN DATA:** If a document contains track changes, redlines, comments, presentation notes, or hidden fields, such information must be viewable in the imaged document. If preserving such information in an imaged document is impossible, it must be produced in its native format.

**UNITIZATION:** Whenever practicable, each imaged PDF must be unitized by file (rather than page).

**PARENT-CHILD RELATIONSHIPS:** Parent-child or family relationships (i.e., the association between an attachment and its parent document) should be preserved to the extent they exist in the way the documents are maintained in the ordinary course of business. Parent emails and any

attachments should be produced as separate, sequential documents. Parent-child relationships must be preserved, all families must be provided in sequential order of the parent document followed by all child documents, and the accompanying load file must indicate and memorialize the “parent” and “child” relationship between such documents.

**METADATA:** Produced documents should be provided with Concordance-compatible image and data load files (i.e., .OPT and .DAT files) using standard Concordance delimiters. Concordance-compatible image and data load files (i.e., .OPT and .DAT files) should be provided in a self-identified “Data” folder. The database load file should contain, at minimum, the following fields: “BEGNO,” “ENDNO,” “BEGATTACH,” “ENDATTACH,” “CUSTODIAN,” and “CONFIDENTIALITY.” The load file should also contain any other fields and metadata stored in the ordinary course of business and otherwise available. To the extent available and otherwise practicable, the metadata and coding fields set forth in Appendix A (attached) that can be extracted from an electronic document shall be produced for that document within the load file. Audio-visual files should be produced in their native format and should be provided with metadata files that should contain, at minimum, the following fields: “BEGNO,” “ENDNO,” “BEGATTACH,” “ENDATTACH,” “CUSTODIAN,” and “CONFIDENTIALITY.”

**DE-DUPLICATION:** The producing Party will de-duplicate responsive ESI using MD5 or SHA-1 hash values at the parent level. “Near duplicate” documents shall be produced rather than removed. The producing Party need only produce a single copy of a particular ESI. However, (1) attachments to emails shall not be eliminated from their parent emails, and (2) hard-copy documents shall not be eliminated as duplicates of responsive ESI. In addition, each Party shall make reasonable efforts to remove duplicate data across custodians for each produced document and to produce searchable metadata in the “All Custodians” and “Duplicate File Path” fields for

each produced document sufficient for the receiving party to identify all custodians and file paths of a particular document that were eliminated from review or production through de-duplication.

**COMPRESSED FILES:** Compressed file types (i.e., .CAB, .GZ, .TAR, .Z, .ZIP) shall be decompressed in a reiterative manner to ensure that a zip within a zip is decompressed into the lowest possible compression resulting in individual files.

**PRODUCTION METHOD:** Documents shall be exchanged electronically through secure file transfer protocols (“sFTP”). The production media shall be labeled with the Volume Number along with the Bates Number range(s) of the materials, and where not practicable to do so, may be provided in an accompanying letter. If a Producing Party encrypts or “locks” the production, the Producing Party shall send, under separate cover, an explanation of how to decrypt the files.

8. Any dispositive motions and supporting memoranda shall be filed on or before **Monday, July 7, 2025**. The deadline to file responses is **Monday, July 28, 2025**. The deadline to file replies is **Monday, August 11, 2025**.

9. A final pretrial conference is scheduled for **Monday, September 8, 2025, at 9 AM**. The parties shall exchange and file pretrial questionnaires as required by DCR 3.201.

10. The bench trial is scheduled for three days and shall commence at **9 AM on Monday, September 15, 2025**.

11. Every pleading, motion, response or reply, shall be filed with the Clerk of the District Court and a copy shall be delivered to chambers pursuant to DCR 3.202(e).

12. The parties shall comply with the terms of the Kansas Code of Civil Procedure and the Third Judicial District Court Rules unless otherwise mutually agreed to in writing and/or excused by the Court.

**IT IS SO ORDERED** this [ ] day of February, 2025.

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Hon. Teresa Watson  
Shawnee County District Court Judge

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IN THE STATE COURT OF KANSAS  
DISTRICT COURT OF SHAWNEE COUNTY

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After consultation with the parties, the Court enters the following Case Management Order for *League of Women Voters of Kansas, et al. v. Scott Schwab, et al.*, 2021-CV-0299, currently pending before this Court:

1. The parties will exchange lists of proposed non-expert witnesses ("fact witnesses"). These lists of fact witnesses shall set contact information for each witness, as well as the subject matter, and a brief synopsis of the substance of the facts to which each witness is expected to testify. The parties' initial lists of proposed fact witnesses shall be served by **Friday, ~~January 14~~ ~~March 7, 2025~~**. The parties shall supplement this list to add any additional witnesses identified in advance of trial and before the close of discovery and, in any case, by no later than

**Friday, Monday, May-June 2, 2025.**

- a. Whether K.S.A. 25-1124(h) and its implementing rules and regulations (the "Signature Verification Requirement") violates equal protection under Section 2 of the Kansas Constitution Bill of Rights

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- b. Whether the Signature Verification Requirement violates due process under Section 18 of the Kansas Constitution Bill of Rights
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3. Alternative dispute resolution is not appropriate for this case.

4. The Plaintiffs shall provide their disclosures pertaining to expert witnesses required by K.S.A. 60-226(b)(6), DCR 3.211, and this Court’s standard interrogatories and requests for production no later than **Friday Monday, April 11, May 5, 2025**. The Defendants will provide the same information pertaining to expert witnesses by **Friday Monday, May 9, June 2, 2025**. For the avoidance of doubt, the parties shall disclose the following information regarding experts:

- a. A copy of the expert’s current and up-to-date CV setting forth the qualifications of the expert and identifying all published and unpublished writings of the expert pertaining to the expert’s opinions in the case. [DCR 3.211(3)]
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be completely shown, except when done using a specific computer program, in which case the specific program must be identified and each input made by the expert into the computer calculation shall be specifically set forth. [DCR 3.211(3), (4)]

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way the documents are maintained in the ordinary course of business. Parent emails and any attachments should be produced as separate, sequential documents. Parent-child relationships must be preserved, all families must be provided in sequential order of the parent document followed by all child documents, and the accompanying load file must indicate and memorialize the “parent” and “child” relationship between such documents.

**METADATA:** Produced documents should be provided with Concordance-compatible image and data load files (i.e., .OPT and .DAT files) using standard Concordance delimiters. Concordance-compatible image and data load files (i.e., .OPT and .DAT files) should be provided in a self-identified “Data” folder. The database load file should contain, at minimum, the following fields: “BEGNO,” “ENDNO,” “BEGATTACH,” “ENDATTACH,” “CUSTODIAN,” and “CONFIDENTIALITY.” The load file should also contain any other fields and metadata stored in the ordinary course of business and otherwise available. To the extent available and otherwise practicable, the metadata and coding fields set forth in Appendix A (attached) that can be extracted from an electronic document shall be produced for that document within the load file. Audio-visual files should be produced in their native format and should be provided with metadata files that should contain, at minimum, the following fields: “BEGNO,” “ENDNO,” “BEGATTACH,” “ENDATTACH,” “CUSTODIAN,” and “CONFIDENTIALITY.”

**DE-DUPLICATION:** The producing Party will de-duplicate responsive ESI using MD5 or SHA-1 hash values at the parent level. “Near duplicate” documents shall be produced rather than removed. The producing Party need only produce a single copy of a particular ESI. However, (1) attachments to emails shall not be eliminated from their parent emails, and (2) hard-copy documents shall not be eliminated as duplicates of responsive ESI. In addition, each Party shall make reasonable efforts to remove duplicate data across custodians for each produced document

and to produce searchable metadata in the “All Custodians” and “Duplicate File Path” fields for each produced document sufficient for the receiving party to identify all custodians and file paths of a particular document that were eliminated from review or production through de-duplication.

**COMPRESSED FILES:** Compressed file types (i.e., .CAB, .GZ, .TAR, .Z, .ZIP) shall be decompressed in a reiterative manner to ensure that a zip within a zip is decompressed into the lowest possible compression resulting in individual files.

**PRODUCTION METHOD:** Documents shall be exchanged electronically through secure file transfer protocols (“sFTP”). The production media shall be labeled with the Volume Number along with the Bates Number range(s) of the materials, and where not practicable to do so, may be provided in an accompanying letter. If a Producing Party encrypts or “locks” the production, the Producing Party shall send, under separate cover, an explanation of how to decrypt the files.

8. Any dispositive motions and supporting memoranda shall be filed on or before **Monday, ~~June 9~~July 7, 2025**. The deadline to file responses is **Monday, ~~June 30~~July 28, 2025**. The deadline to file replies is **Monday, ~~July 14~~August 11, 2025**.

9. A final pretrial conference is scheduled for **Monday, ~~August 11~~September 8, 2025, at 9 AM**. The parties shall exchange and file pretrial questionnaires as required by DCR 3.201.

10. The bench trial is scheduled for ~~five-three~~ days and shall commence at **9 AM on Monday, ~~August 18~~September 15, 2025**.

11. Every pleading, motion, response or reply, shall be filed with the Clerk of the District Court and a copy shall be delivered to chambers pursuant to DCR 3.202(e).

12. The parties shall comply with the terms of the Kansas Code of Civil Procedure and the Third Judicial District Court Rules unless otherwise mutually agreed to in writing and/or

excused by the Court.

**IT IS SO ORDERED** this [ ] day of ~~December~~February, 20254.

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Hon. Teresa Watson  
Shawnee County District Court Judge

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