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KS. DISTRICT COURT  
THIRD JUDICIAL DIST.  
TOPEKA, KS

**IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS  
CIVIL COURT DEPARTMENT**

2012 NOV -9 P 3:37

JOHN DOE, )  
)  
*Plaintiff,* )  
)  
vs. )  
)  
KIRK THOMPSON, DIRECTOR, )  
*et al.,* )  
)  
*Defendants.* )

Case No. 12 C 168  
Div. No. 6

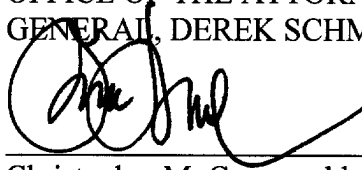
**JOINT MOTION FOR SUMMARY JUDGMENT**

COME NOW Defendants Kirk Thompson, Director of the Kansas Bureau of Investigation, and Frank Denning, Sheriff of Johnson County, Kansas and pursuant to K.S.A. § 60-256, move the court for judgment in their favor. Even when viewed in a light most favorable to Plaintiff, the material facts in this case are uncontroverted and the Defendants should be granted judgment as a matter of law.

First, judgment is proper where Plaintiff's instant cause of action is specifically proscribed by K.S.A. § 22-4908. Judgment is also proper where the 2011 amendments to the Kansas Offender Registration Act are constitutional, and Plaintiff's *ex post facto* argument fails as a matter of law. Similarly, judgment as a matter of law should be entered on Plaintiff's claims of retroactivity where they too, fail as a matter of law.

WHEREFORE, Defendants move for an order granting them summary judgment and for such other and further relief as the Court deems just and equitable.

OFFICE OF THE ATTORNEY  
GENERAL, DEREK SCHMIDT



Christopher M. Grunewald, KS Bar No. 23216  
Ward Loyd KS Bar No. 6725

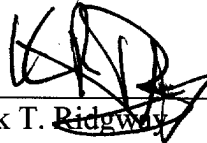
Assistant Attorneys General  
Memorial Building, 2<sup>nd</sup> Floor  
120 SW 10th Avenue  
Topeka, Kansas 66612

(p)(785) 296-6244 / (f)(785) 291-3767

Email: [chris.grunewald@ksag.org](mailto:chris.grunewald@ksag.org)  
[ward.loyd@ksag.org](mailto:ward.loyd@ksag.org)

*Attorneys for Defendant Kirk Thompson  
Director of Kansas Bureau of Investigation*

FERREE, BUNN, RUNDBERG, RADOM &  
RIDGWAY, CHARTERED



Kirk T. Ridgway KS No. 17172

9300 Metcalf Avenue Ste. 300  
Overland Park, Kansas 66212

(P) (913) 381-8180 / (F) (913) 381-8836

[kridgway@fbr3law.com](mailto:kridgway@fbr3law.com)

*Attorneys for Defendant Frank Denning,  
Sheriff of Johnson County, Kansas*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing Joint Motion for Summary Judgment was sent by U.S. mail, postage prepaid, this 9<sup>th</sup> day of November, 2012 addressed to:

Christopher M. Joseph  
1508 S.W. Topeka Blvd.  
Topeka, Kansas 66612  
(785) 234-3272 (785) 234-3610 – Fax  
[cjoseph@josephhollander.com](mailto:cjoseph@josephhollander.com)  
*Attorneys for Plaintiff*

Original filed with:

Clerk of the District Court  
Shawnee County Courthouse  
200 SE 7th St. Room 209  
Topeka, KS 66603

And a copy hand delivered to:

Honorable Larry D. Hendricks  
Shawnee County Courthouse  
200 SE 7<sup>th</sup> St. Division Six  
Topeka, Kansas 66603

A handwritten signature in black ink, appearing to read "Ward E. Loyd", written over a horizontal line.

Ward E. Loyd