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.

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DATED: June 24, 2026

Respectfully Submitted,

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