

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

MIGUEL COCA and	)	
ALEJANDRO RANGEL-LOPEZ,	)	
	)	
Plaintiffs,	)	Case No. 6:22-cv-01274-EFM-RES
	)	
vs.	)	
	)	
CITY OF DODGE CITY, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS’ MOTION TO AMEND AND CERTIFY ORDER
FOR INTERLOCUTORY APPEAL AND
MOTION TO STAY PROCEEDINGS PENDING APPEAL**

Defendants hereby move the Court for an order amending and certifying for interlocutory appeal this Court’s April 18, 2023 Memorandum and Order (Doc. 71) pursuant to 28 U.S.C. § 1292(b). Defendants further move to stay this proceeding through appeal if their motion is granted. For the reasons stated in their contemporaneously filed memorandum in support, Defendants’ requests should be granted.

Respectfully submitted,

FOULSTON SIEFKIN LLP

By: /s/ Anthony F. Rupp
 Anthony F. Rupp, KS #11590
 Tara Eberline, KS #22576
 Sarah E. Stula, KS #27156
 7500 College Boulevard, Suite 1400
 Overland Park, Kansas 66210
 T (913) 498-2100 | F (913) 498-2101
 trupp@foulston.com
 teberline@foulston.com
 sstula@foulston.com

-and-

Clayton J. Kaiser, KS #24066
FOULSTON SIEFKIN, LLP
1551 North Waterfront Parkway, Suite 100
Wichita, Kansas 67206
T (316) 267-6371 | F (316) 267-6345
ckaiser@foulston.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on the 2nd of May 2023, the foregoing was electronically filed with the Clerk of the Court by using the Court's e-Filing system which will send notification of electronic filing to counsel for all parties of record, and a true and correct copy was served by electronic mail upon:

Sharon Brett, KS #28696
**AMERICAN CIVIL LIBERTIES
UNION OF KANSAS**
sbrett@aclukansas.org

Chad W. Dunn (*Pro Hac Vice*)
Sonni Waknin (*Pro Hac Vice*)
Bernadette Reyes (*Pro Hac Vice*)
UCLA VOTING RIGHTS PROJECT
chad@uclavrp.org
sonni@uclavrp.org
bernadette@uclavrp.org

Jonathan Topaz (*Pro Hac Vice*)
Sophia Lin Lakin (*Pro Hac Vice*)
Luis M. R. Roman (*Pro Hac Vice*)
**AMERICAN CIVIL LIBERTIES
UNION, INC.**
jtopaz@aclu.org
slakin@aclu.org
lroman@aclu.org

Abena Mainoo (*Pro Hac Vice*)
Jonathan I. Blackman (*Pro Hac Vice*)
JD Colavecchio (*Pro Hac Vice*)
Mijin Kang (*Pro Hac Vice*)
Elizabeth R. Baggott (*Pro Hac Vice*)
**CLEARY GOTTlieb STEEN &
HAMILTON LLP**
amainoo@cgsh.com
jblackman@cgsh.com
jdcolavecchio@cgsh.com
mkang@cgsh.com
ebaggott@cgsh.com

Scott Fuqua (*Pro Hac Vice*)
FUQUA LAW & POLICY, P.C.
scott@fuqualawpolicy.com

ATTORNEYS FOR PLAINTIFFS

/s/ Anthony F. Rupp
Anthony F. Rupp, KS #11590