

IN THE SUPREME COURT OF  
THE STATE OF KANSAS

James Hadley, <i>et al.</i> ,	)	
Petitioners,	)	
vs.	)	Case No. 122,760
Jeffrey Zmuda, in his official	)	
capacity as the Secretary for	)	
the State of Kansas, <i>et al.</i> ,	)	
Respondents.	)	
_____	)	

**LIMITED ENTRY OF APPEARANCE PRESERVING ALL RIGHTS  
AND DEFENSES INCLUDING OBJECTIONS TO SERVICE OF  
PROCESS AND DEFENSES OF PERSONAL JURISDICTION**

On April 10, 2020, this Court proceeding *ex parte* ordered Respondents to submit Responses to Petitioners’ filings in this matter by noon on April 14, 2020. The Court’s Order included “[h]as service been affected on all necessary parties?” as an issue to be addressed at oral argument scheduled for April 15, 2020.

In compliance with the Court’s April 10, 2020 Order and as necessitated by the Court’s electronic filing system, Fred Phelps, Jr., Deputy Chief Legal Counsel as lead counsel or purposes of subsequent filings and notices, along with Kristafer Ailsieger, Deputy Solicitor General and Natasha M. Carter, Assistant Attorney General, as co-counsel, hereby enter their respective appearances on behalf of Respondents Jeffrey Zmuda, Secretary of Corrections

for the State of Kansas, Shannon Meyer, Warden of Lansing Correctional Facility, Donald Langford, Warden of Ellsworth Correctional Facility, and Gloria Geither, Warden of Topeka Correctional Facility, expressly preserving all rights and defenses including objections to service of process and defenses of personal jurisdiction.

Respectfully Submitted,

OFFICE OF ATTORNEY GENERAL  
DEREK SCHMIDT

*/s/ Natasha M. Carter*

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*Attorney for Respondents Appearing  
Under Limited Appearance*

## CERTIFICATE OF SERVICE

I hereby certify that on this 14<sup>th</sup> day of April, 2020, I electronically filed the foregoing with the Clerk of the Appellate Court's electronic filing system which will serve all registered participants and a copy was also served by email, addressed to: Lauren Bonds, Zal K. Shroff, ACLU Foundation of Kansas, 6701 W. 64<sup>th</sup> St., Suite 210, Overland Park, KS 66202, [lbonds@aclukansas.org](mailto:lbonds@aclukansas.org), [zshroff@aclukansas.org](mailto:zshroff@aclukansas.org), Counsel for Petitioners.

*/s/Natasha M. Carter* \_\_\_\_\_

Natasha M. Carter