

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF KANSAS  
KANSAS CITY DIVISION

**M.B.** and **S.E.** through their next friend )  
Katharyn McIntyre, **R.M.** through his next )  
friend Allan Hazlett, **C.A.** through his next )  
friend Allan Hazlett, **E.B.** through his next )  
friend Allan Hazlett, **J.P.** through her next )  
friend Allan Hazlett, **Z.Z.** through her next )  
friend Ashley Thorne, and **M.A.** through his )  
next friend Ashley Thorne, for themselves and )  
those similarly situated, )

Case No. 2:18-cv-02617-DDC-GEB

**Plaintiffs,**

v.

) **PLAINTIFFS' MOTION FOR**  
) **ATTORNEYS' FEES AND**  
) **EXPENSES**

**Laura Howard** in her official capacity as )  
Kansas Department for Children and Families )  
Secretary, **Dr. Lee A. Norman** in his official )  
capacity as Kansas Department of Health and )  
Environment Secretary, and **Laura** )  
**Howard** in her official capacity as Kansas )  
Department for Aging and Disability Services )  
Secretary, )

**Defendants.**

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Pursuant to 42 U.S.C. § 1988(b), Fed. R. Civ. P. 23(h) and 54(d), and Local Rule 54.2,  
Plaintiffs hereby move for an award of attorneys' fees and expenses. Plaintiffs respectfully  
request that the Court award them their reasonable attorneys' fees in the amount of  
\$3,753,896.50 and expenses in the amount of \$128,476.01.

This motion is more fully described and supported by the accompanying brief, the  
accompanying declarations and exhibits, and the entire record in the case.

Dated: November 30, 2020

Respectfully submitted,

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

*/s/ Teresa A. Woody*

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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the Clerk of the Court on November 30, 2020, to be served by the operation of the Court's CM/ECF electronic filing system upon all parties.

DATED: November 30, 2020

*/s/ Teresa A. Woody* \_\_\_\_\_

Teresa A. Woody

**Attorney for Plaintiffs**