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IN THE THIRD JUDICIAL DISTRICT
DISTRICT COURT OF SHAWNEE COUNTY KANSAS
CIVIL DEPARTMENT

LUKE GANNON,
By his next friends and guardians, *et al.*,

Plaintiffs,

v.

STATE OF KANSAS,

Defendant.

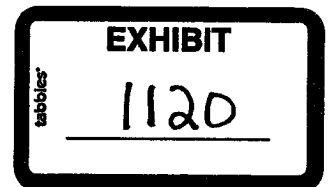
Case No.: 10-C-1569

**PLAINTIFFS' RESPONSE TO
DEFENDANT STATE OF KANSAS' FIRST REQUESTS FOR ADMISSIONS**

COMES NOW Plaintiff, Luke Gannon, by his next friends and guardians, *et al.*, ("Plaintiffs"), by and through their undersigned counsel of record, and responds to Defendant State of Kansas' First Requests for Admission, as follows:

1. Plaintiffs do not allege the weighting factors in the School District Finance and Quality Performance Act violate their rights under the United States Constitution or under the Bill of Rights of the Kansas Constitution.

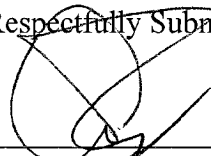
Admitted _____ Denied _____



Objection. This request is compound, disjunctive, vague, and ambiguous. The use of the term "weighting factors" is not clear without further definition. Subject to and without waiving the foregoing objections, Plaintiffs state as follows: Plaintiffs cannot admit or deny the request as propounded. To the extent the School District Finance and Quality Performance Act ("SDFQPA") is not severable and the referenced weighting factors are an integral part of the SDFQPA, Plaintiffs necessarily allege the weighting factors violate their constitutional rights to the same extent that any other aspect of the SDFQPA violates any of Plaintiffs' constitutional rights.

Dated this 14th day of April, 2011.

Respectfully Submitted,



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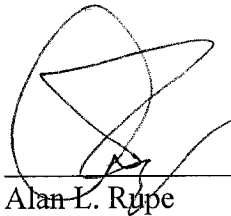
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2011, a true and correct copy of the above and foregoing was sent by first class mail and facsimile to the following:

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