

In the District Court  
of  
Shawnee County, Kansas

**Jigisha Modi, et al.,**

Plaintiffs,

v.

**Kansas State Board of Cosmetology, et al.,**

Defendants.

Civil Action No. 2020-CV-000595

Plaintiffs' Voluntary Dismissal Without  
Prejudice Pursuant to Stipulation; Certificate  
of Service.

Division Eight

**Plaintiffs' Voluntary Dismissal Without Prejudice Pursuant to Stipulation**

Plaintiffs filed a lawsuit on November 16, 2020, challenging the constitutionality of Kansas' eyebrow threading licensing regime. (Doc. 1.) Plaintiffs sought declaratory judgment and injunctive relief on the grounds the licensing regime violated Kansas' life, liberty, and pursuit of happiness clause (Kan. Const. Bill of Rights, Sec. 1), Kansas' due process of law clause (Sec. 18), and under Kansas' equal protection clauses.

During the pendency of the litigation, the Kansas Legislature passed, and the Governor signed into law, Kan. Leg. 2022 SB 348, entitled, "AN ACT concerning public health; relating to cosmetology; hair removal; exempting persons engaged in threading from the practice of cosmetology and the requirements thereof; amending K.S.A. 65-1901 and 65-1928 and repealing the existing sections."

In light of Kan. Leg. 2022 SB 348, the parties stipulate to a dismissal without prejudice pursuant to KSA § 60-241(a)(1)(A)(ii), with the parties to bear their own costs and fees.

/

/

/

/

/

Kansas Justice Institute  
By: Samuel G. MacRoberts, 22781

/s/ Samuel G. MacRoberts  
Samuel G. MacRoberts  
12980 Metcalf Avenue, Suite 130  
Overland Park, Kansas 66213  
Sam.MacRoberts@KansasJusticeInstitute.org  
(913) 213-5018  
Attorneys for Plaintiffs

and

Office of Attorney General Derek Schmidt

/s/ Arthur S. Chalmers  
Arthur S. Chalmers, KS S. Ct. #11088  
Assistant Attorney General  
120 SW 10th Ave., 2nd Floor  
Topeka, Kansas 66612  
Ph: (785) 368-8426  
Fax: (785) 291-3707  
Email: art.chalmers@ag.ks.gov  
Attorney for Defendants

**Certificate of Service**

To: Arthur S. Chalmers  
Assistant Attorney General  
120 SW 10th Ave., 3<sup>rd</sup> Floor  
Topeka, Kansas 66612  
Ph: (785) 368-8426  
Fax: (785) 291-3707  
Email: art.chalmers@ag.ks.gov

The undersigned certifies that on the below date, the forgoing document(s) were filed using the electronic filing system, which will send notification of such filing to all participants, including to the above.

Dated: July 8, 2022.

/s/ Samuel G. MacRoberts  
Samuel G. MacRoberts