

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

ERIC MEYER, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 2:24-cv-02122-DDC-GEB
	)	
CITY OF MARION, KANSAS, et al.,	)	
	)	
Defendants.	)	

Joint Motion for Entry of Consent Judgment

Plaintiffs Eric Meyer, individually and as executor of the estate of Joan Meyer, and The Hoch Publishing Co., Inc., doing business as the *Marion County Record*, and Defendants the Marion County Board of County Commissioners, Sheriff Jeff Soyez, both individually and as Marion County Sheriff, and Aaron Christner, hereby jointly move this Court to enter Judgment against these Defendants. In support of their motion, the parties state as follows:

1. On July 12, 2024, Plaintiffs filed their First Amended Complaint, which included various claims against these Defendants and others.

2. These Defendants have consented to the entry of a Consent Judgment in favor of Plaintiffs and against these Defendants in the amount of One Million Five Hundred Thousand Dollars and No Cents (\$1,500,000.00) in the form attached as Exhibit A.

3. The proposed Consent Judgment resolves all of Plaintiffs' claims against these Defendants in the First Amended Complaint, including Plaintiffs' claims for attorneys' fees and costs.

4. Plaintiffs' claims against the remaining Defendants, namely, the City of Marion, Kansas, David Mayfield, both individually and in his official capacity, Gideon Cody, both individually and in his official capacity, and Zachary Hudlin, remain and are unaffected by this proposed Consent Judgment.

WHEREFORE, Plaintiffs Eric Meyer, individually and as executor of the estate of Joan Meyer, and The Hoch Publishing Co., Inc., doing business as the *Marion County Record*, and Defendants the Marion County Board of County Commissioners, Jeff Soyez, both individually and as Marion County Sheriff, and Aaron Christner, jointly request this Court entered the attached Consent Judgment in favor of Plaintiffs and against Defendants in the amount of One Million Five Hundred Thousand Dollars and No Cents (\$1,500,000.00).

Dated: November 11, 2025

Respectfully submitted,

By: /s/ Bernard J. Rhodes

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ATTORNEY FOR DEFENDANTS

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Plaintiffs,	)	
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v.	)	Case No. 2:24-cv-02122-DDC-GEB
	)	
CITY OF MARION, KANSAS, et al.,	)	
	)	
Defendants.	)	

CONSENT JUDGMENT

Plaintiffs Eric Meyer, individually and as executor of the estate of Joan Meyer, and The Hoch Publishing Co., Inc., doing business as the *Marion County Record*, appear by and through counsel of record, Bernard J. Rhodes and Emma C. Halling of Lathrop GPM. Defendants the Marion County Board of County Commissioners, Sheriff Jeff Soyez, both individually and as Marion County Sheriff, and Aaron Christner appear by and through their counsel of record, Jeffrey M. Kuhlman of Watkins Calcara, Chtd. There are no other appearances.

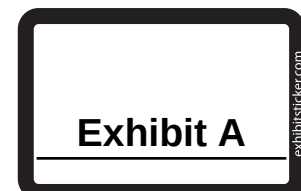
Pursuant to the parties' joint motion, it is ordered, adjudged, and decreed that:

1. In Count I of the Plaintiffs' First Amended Complaint Plaintiffs allege that Sheriff Soyez and Detective Christner directly violated their First Amendment Rights.

2. In Count II, Plaintiffs allege that Sheriff Soyez engaged in retaliation in violation of the First Amendment.

3. In Count III, Plaintiffs allege that Sheriff Soyez and Detective Christner violated the Fourth Amendment.

4. In Count IV, Plaintiffs allege that Marion County and Sheriff Soyez in his official capacity are liable for the violations alleged in Counts I-III.



5. In Count V, Plaintiffs allege that Sheriff Soyez and Detective Christner engaged in a conspiracy to violate Plaintiffs' First and Fourth Amendment rights.

6. In Count VI, Plaintiffs allege that Marion County and Sheriff Soyez in his official capacity violated the Privacy Protection Act (42 U.S.C. § 2000aa).

7. The above-named Defendants consent to judgment on Counts I, II, III, IV, V, and VI in the amount of One Million Five Hundred Thousand Dollars and No Cents (\$1,500,000.00).

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that judgment be entered in favor of Plaintiff Eric Meyer, as executor of the estate of Joan Meyer, and against Defendants the Marion County Board of County Commissioners, Jeff Soyez, both individually and as Marion County Sheriff, and Aaron Christner, in the amount of One Million Dollars and No Cents (\$1,000,000.00).

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that judgment be entered in favor of Plaintiff Eric Meyer, individually, and against Defendants the Marion County Board of County Commissioners, Jeff Soyez, both individually and as Marion County Sheriff, and Aaron Christner, in the amount of Two Hundred Thousand Dollars and No Cents (\$200,000.00).

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that judgment be entered in favor of Plaintiff The Hoch Publishing Co., Inc., doing business as the *Marion County Record*, and against Defendants the Marion County Board of County Commissioners, Jeff Soyez, both individually and as Marion County Sheriff, and Aaron Christner, in the amount of Three Hundred Thousand Dollars and No Cents (\$300,000.00).

Dated this ____ day of November, 2025, at Kansas City, Kansas.

s/ Daniel D. Crabtree
Daniel D. Crabtree
United States District Judge