

James J. Welch, #09546
Assistant Attorney General
Office of the Attorney General
120 West 10th Street, 4th Floor
Topeka, Kansas 66612-1597
(785) 296-3751

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KS. DISTRICT COURT
THIRD JUDICIAL DIST
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GENERAL JURISDICTION
TOPEKA, KANSAS

IN THE DISTRICT COURT OF SHAWNEE COUNTY, KANSAS
Division 3

STATE OF KANSAS, *ex rel.*
CARLA J. STOVALL, Attorney General,

Plaintiff,

vs.

DYNASTY MARKETING,

Defendant.

Case No. 00 C 834

(Pursuant to K.S.A. Chapter 60)

MOTION FOR DEFAULT JUDGMENT

COMES NOW the plaintiff, State of Kansas, *ex rel.* Carla J. Stovall, Attorney General, by and through James J. Welch, Assistant Attorney General, and for her motion alleges and states as follows:

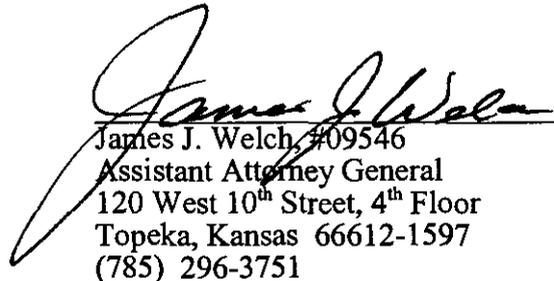
- 1) On or about July 13, 2000, the plaintiff brought suit against the defendant, Dynasty Marketing, for enforcement of a subpoena pursuant to K.S.A. §77-624(a) and K.S.A. §50-631(e).
- 2) To date, Defendant has failed to respond to the plaintiff's petition or otherwise plead.
- 3) Pursuant to K.S.A. §50-631(e)(1) and (2), the court may grant injunctive relief restraining the sale or advertisement of any merchandise or issue any other relief as may be required.

4) The basis for the complaint filed with the Attorney General's Consumer Protection Division is violations of the Kansas Consumer Protection Act, K.S.A. §50-623 *et seq.*

WHEREFORE, plaintiff prays that the court issue an order restraining the defendant from the sale or advertisement of any merchandise or services, and further relief as the court deems just and equitable.

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL
CARLA J. STOVALL



James J. Welch, #09546
Assistant Attorney General
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Topeka, Kansas 66612-1597
(785) 296-3751

Attorney for plaintiff