

LOLA C. TEARE and HOWARD F.  
TEARE, a Co-partnership doing  
business as Universal Features  
Advertising Company,  
Plaintiffs,

vs.

ELLIS McKENZIE, Individually  
and doing business as New  
Sanitary Market,  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
AT LAW.

No. 1468

MOTION FOR JUDGMENT BY DEFAULT

Now comes the Plaintiffs and show unto the Court that the Complaint in this cause was filed February 28, 1950, and that a copy of the Complaint and Summons was served upon the Defendant by the Sheriff of Baldwin County, Alabama, on February 28, 1950, and that to the date hereof the Defendant has failed to appear and demur, plea, or otherwise answer to the Complaint.

WHEREFORE, the Plaintiffs move the Court to enter a Judgment by Default against the Defendant in this cause.

Dated this 6th day of May, 1950

James P. McMurphy  
Attorney for Plaintiffs.

RECORDED

LOLA C. TEARE and HOWARD F.  
TEARE, a Co-partnership doing  
business as Universal Features  
Advertising Company,  
Plaintiffs,

vs.

ELLIS MCKENZIE, individually  
and doing business as New  
Sanitary Market,  
Defendant.

Motion for Judgment by  
Default

Filed: May 4, 1950

J. J. Mashburn, Jr.  
Judge.

LOLA C. TEARE and HOWARD F. )  
TEARE, A Co-partnership doing )  
business as Universal Features )  
Advertising Company, )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Plaintiffs,

ELLIS MCKENZIE, Individually  
and doing business as New  
Sanitary Market,

NO. \_\_\_\_\_

Defendant.

Plaintiff claims of the Defendant the sum of One Hundred Seventeen and NO/100 Dollars (\$117.00), due from him by account on, to-wit, the 1st day of March 1946, which sum of money with interest thereon is still due and unpaid.

James P. McMurphy  
Attorney for Plaintiffs.

James P. McMurphy  
Attorney for Plaintiffs

New Sanitary Market  
Fairhope, Alabama.

Itemized account of Mr. Ellis McKenzie, New Sanitary Market, Fairhope, Alabama:

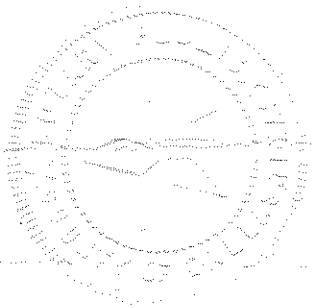
February 18, 1946	Copyrighted BETTY SUE Advertising material.....	\$156.00
February 18, 1946	Payment Received.....	\$ 39.00
Total Unpaid Balance.....		\$117.00

The foregoing itemized account represents a true and correct statement of the amount due and owing to Universal Features Advertising Company, a Co-partnership, by Mr. Ellis McKenzie, and credit for all payments has been given.

John F. McCarthy  
John F. McCarthy, Bookkeeper

STATE OF TEXAS      |  
COUNTY OF DALLAS    |      ss

Subscribed and sworn to before me the undersigned Notary Public in and for said County and State, on this the 21st day of February, 1950.



Edward Rolsten  
Edward Rolsten, Notary Public  
in and for the County of Dallas,  
State of Texas

MY COMMISSION EXPIRES 6-1-51

Received in Sheriff's Office  
this 28 day of Feb, 1950  
TAYLOR WILKINS, Sheriff

executed 2-28-50  
by service copy of within Summons and  
Complaint on

Ellis Mc Kenzie Ind.  
and doing business as  
Sanitary Market

Taylor Wilkins  
147 Hall Deputy Sheriff

701468 RECORDED  
RECORDED  
LOLA C. TEARE and HOWARD  
F. TEARE, A Co-partnership  
doing business as Universal  
Features Advertising Company,

Plaintiffs,

vs.

ELLIS McKENZIE, Individually  
and doing business as New  
Sanitary Market,

Defendant.

COMPLAINT

FILED

FEB 28 1950

ALICE J. BROWN, CLERK

JAMES P. McMURPHY  
ATTORNEY-AT-LAW  
FIRST NATIONAL BANK BLDG. - 2ND FLOOR  
PHONE 280  
ATMORE, ALABAMA

February 27, 1950

Mrs. Alice J. Duck  
Clerk of the Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

Please file the enclosed complaint and have the sheriff serve a copy on the Defendant.

As the Plaintiffs are non-residents of the state, I am enclosing a check for \$12.50 payable to you as security for court costs. If this amount is not sufficient, please let me know.

Very truly yours,

• *James P. McMurphy*  
James P. McMurphy

1468

Lola C. Seare &  
Howard F. Seare  
d/b/a  
Feature Advertising Co

vs.

Ellis Mc Rungie  
d/b/a New Sanitary Market

Suit on account  
Filed 2-28-67

Jas Mc Murphy

1468