

HERMAN LAWRENZ,

Complainant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

-VS-

BILL OF COMPLAINT

WILLIAM ET COONEY, JOHN R. COONEY, PATRICK J. COONEY, JR., MARY SMITH, ANNIE M. JONES and THOMAS COONEY,

Respondents.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your complainant, Herman Lawrenz, respectfully represents that he is over the age of twenty-one years and a resident of Baldwin County, Alabama; that the respondent, William E. Cooney, is also over the age of twenty-one years and a resident of Baldwin County, Alabama, residing at Foley therein; that the respondent, John R. Cooney, is also over the age of twenty-one years and a resident of Jefferson County, Alabama; that the respondent, Patrick J. Cooney, Jr., is also over the age of twenty-one years and a resident of Mobile County, Alabama; that the respondent, Mary Smith, is also over the age of twenty-one years and a resident of Mobile County, Alabama; that the respondent, Annie M. Jones, is also over the age of twenty-one years and a resident of Mobile County, Alabama; that the respondent, Thomas Cooney, is also over the age of twenty-one years and is a non-resident of the State of Alabama, residing in the State of Ohio, in the City of Cleveland therein, his more definite and certain address being to your complainant unknown.

PART TWO

Your complainant alleges:-

1. That your complainant is in the actual, peaceable possession, claiming to own the same of the following described lands in Baldwin County, Alabama, to-wit:-

Lots eighteen (18) and nineteen (19) in block ten (10) in the Town of Foley......

- 2. That the respondents claim or are reputed to own the same or a part thereof or some interest therein or to hold some lien or encumbrance thereon.
- 3. That no suit is pending to enforce or test the validity of such title, claim or encumbrance of the respondents.
- 4. Your complainant calls upon the respondents, William E. Cooney, John R. Cooney, Patrick J. Cooney, Jr., Mary Smith, Annie M. Jones and Thomas Cooney, and each of them, to set forth and specify his title, claim, interest or encumbrance and how and by what instrument the same is derived and created.

PRAYER FOR PROCESS

WHEREFORE, your complainant prays that your Honor will issue to him the writ of summons of the State of Alabama commanding the respondents, William E. Cooney, John R. Cooney, Patrick J. Cooney, Jr., Mary Smith and Annie M. Jones, to appear in this Honorable Court within thirty (30) days from the service of said writ to answer, demur or plead to this Bill of Complaint and to stand to and abide such order or decree as may be entered therein; that your Honor will direct the Register of this Court to make out and superintend the appropriate order of publication to the non-resident respondent, Thomas Cooney, commanding him within thirty (30) days after the period specified in the order of publication to appear before your Honor in this Honorable Court, then and there to answer, demur or plead to this Bill of Complaint and to stand to and abide such order or decree as may be entered therein; and your complainant will ever pray & c.

PRAYER FOR RELIEF

Your complainant further prays that upon a hearing of this cause your Honor will consider and determine the title, claim, interest and encumbrance of the respondents in and to the lands here-inbefore described and finally adjudge and decree that the respondents, and each of them, have no right, title, interest in or encumbrance upon such lands or any part thereof and that the title of your complainant in and to said lands may be quieted and confirmed in him and the respondents, and each of them, be perpetually en-

joined from having, claiming or asserting any right, title, interest in or encumbrance upon said lands or any part thereof and that your complainant may have such other, further and different relief in the premises as may be just and equitable.

FOOTNOTE

The respondents, William E. Cooney, John R. Cooney, Patrick J. Cooney, Jr., Mary Smith, Annie M. Jones and Thomas Cooney, are each hereby required to answer the allegations of part two of the Bill of Complaint from paragraph numbered one to paragraph numbered four, both inclusive, but not under oath, oath to answer being hereby expressly waived.

CHANCERY EXECUTION

BILL OF COSTS

William E Cooney et al.

Plaintiff

 $\mathbf{v}_{\mathbf{s}}$.

toxx. 170. Herman Lawrenz.

Defendant FEES OF REGISTER Dollars Cents ^{\$} 5 65 Brought Forward Poop For Receiving, keeping and paying Filing each bill and other papers.....\$ Issuing each subpoena 50
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Each order appointing guardian 1 00
Any other order by Register 50
Issuing commission to take testimony 50
Receiving and filing 10
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Entering order submitting cause 50
Entering any other order of court 25
Noting all testimony 50
Abstract of cause, etc. 1 00
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Witness certificate, each 50 Issuing execution, each 1 75 Entering each return 15
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Serving attachment, contempt of Exam'ing each voucher of Receiver, etc.

Examining each answer, etc.

Recording resignation, etc.

Entering each cert. to Supreme Court.

Taking questions and answers, etc.

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Trial Tax 3 00 Recording Decree in Probate Court.... 5 65 Sub Total Carried Forward Total..... 170. The State of Alabama, No. Circuit Court, In Equity—Feb.—Term, 194-2. Baldwin County. To Any Sheriff of the State of Alabama--GREETINGS: You are hereby commanded, That of the goods and chattels, lands and tenements of ___ __Cpmpldant___ Herman Lawrenz,... you cause to be made the sum of- Dollars. W E Conney et al. — Plaintiff..... Feb. recovered of ____Case Abated. —on the—— _day of_ by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of-Twenty Three and 65/100..... costs of suit, and have the same to render to the saidand make return of this Writ and the execution thereof, according to law. _194____ to date of collection. Witness my hand, this 7th day of Aug,

HERMAN LAWRENZ,

Complainant,

VS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY,

NUMBER 170.

Respondents.

And now come the Respondents, separately and severally, and for answer to the Complainant's Bill of Complaint in this cause and to each count thereof, separately and severally, say:

ONE:

That they deny each and every allegation contained in said Bill of Complaint not herein specifically admitted and demand strict proof of the same.

TWO:

That they admit the allegation contained in paragraph One.

THREE:

That they deny the allegation contained in paragraph Two, and demand strict proof of the same.

And further answering the Complainant's Bill of Complaint and praying that it may be taken as their Cross Bill, the Respondents say:

FIRST:

That they are the owners in fee simple and in the actual possession of the land described in the original Bill of Complaint, to-wit:

Lots 18 and 19 in Block 10 in the Town of Foley, Baldwin County, Alabama.

SEC OND:

That they own the same as heirs of P. J. Cooney, who was

the owner of and in the actual possession thereof at the time of his death.

THIRD:

That they call upon the Complainant to set forth and specify his title, claim, interest in or incumbrance on said land, and how and by what instrument the same is derived or created.

Wherefore the premises considered, the Respondents and Cross-Complainants pray that your Honor will by proper process make the said Herman Lawrenz party Respondent to their Cross Bill, requiring him to plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court;

Your Respondents and Cross-Complainants further pray that upon a final hearing of this cause your Honor will establish the title of the Respondents and Cross-Complainants to the said lands, and further decree that the Complainant and Cross-Respondent has no right, title, interest in or incumbrance upon said lands or any part thereof. Respondents and Cross-Complainants further pray that your Honor will give and grant unto them such other, further, different or general relief as in Equity and good conscience they are entitled to receive, and as in duty bound they will ever pray.

Solicitors for Respondents and Cross-Complainants.

FOOT NOTE:

The Complainant and Cross-Respondent is required to answer each and every allegation contained in the foregoing Cross Bill, in paragraphs First to Third, inclusive, but not under oath, oath being hereby expressly waived.

Solicitors for Respondents and Cross-Complainants.

HERMAN LAWRENZ,

Complainants,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

VS.

W. E. COONEY et al,

Respondents.

Comes now Louise Lawrenz, M. K. Lawrenz and Margaret Lawrenz and respectfully show to the Court that they are the widow, son and daughter of Herman Lawrenz, the above named complainant and the only heirs at law of the said Herman Lawrenz.

That the said Herman Lawrenz is dead and this cause should be revived in the names of his heirs as complainants.

WHEREFORE, they move the Court for an order reviving said cause in their names as complainants.

Solicitor for Complainant

The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama-GREETING:

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HERMAN LAWRENZ,

Complainant,

VS.

WILLIAM E. COONEY, ET AL,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW.

And now come the Respondents, WILLIAM E. COONEY and JOHN R. COONEY and demur to the original Bill of Complaint in this cause and for ground thereof say:

That there is no equity in the bill.

Solicitors for the Respondents, William E. Cooney and John R. Cooney.

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Your complainant, Herman Lawrenz, respectfully represents that he is over the see of twenty-one years and a resident of Baldwin County, Alabama; that the respondent, William E. Cooney, is also over the age of trenty-one rears and a resident of Baldwin County, Alabama, residing at Fole therein; that the respondent, John B. Coopey, is also over the age of twenty-one years and a resident of Jefferson County, Alabama; that the respondent, Patrick J. Loopey, ir., is also over the age of treaty-one years and a resident of Mobile County, Alabems; that the respondent, Mary Smith, is also over the sac of twenty-one years and a resident of Mobile County. Alabama; that the respondent, Annie M. Jones, is also ever the age of twenty-one years and a resident of Mobile County, Alabama; that the respondent, Thomas Cooney, is also ever the age of twenty-one years and is a mon-resident of the State of Alabama, residing in the State of Chic, in the Sity of Clevelant therein, his more definite and certain address being to your complainant unknown.

Tour complainant allegen:-

1. That your complainment is in the actual, peaceable passession, claiming to own the same of the following described lands in Baldwin County, Alabama, to-wit:-

- s. That the respondents claim or are reputed to own the same or a part thereof or some interest therein or to hold some lien or encumbrance thereon.
- a. That no sait is pending to enforce or test the validity of such title, claim or empendence of the respondence.
- 4. Your complainant calls upon the respondents, William B. Comey, John R. Gomey, Patrick J. Comey, Jr., Mary Salto, Annie M. Jones and Thomas Comey, and each of them, to set forth and specify his title, claim, interest or engagerance and how and by what instrument the same is corived and created.

to him the writ of sussions of the State of Alabase commanding the respondents, William E. Cooney, John R. Cooney, Fetrick J. Cooney, Jr., Wary Smith and Americ E. Jones, to appear in this Homorable Court within thirty (30) days from the service of said writ to answer, demur or plead to this Bill of Newslaint and to stand the englisher of this Court to make but and superlatend the appropriate order of publication to the non-resident respondent, Thomas Cooney, commanding him within thirty (50) days after the period specified in the order of publication to appear before your Honor in this Honorable Court, then and there to enswer, desur or plead to this Bill of Complaint and to stand to and shide such order or decree as may be entered therein; and pour complainant will ever pray & c.

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Your complainant forther grays that upon a he ring of this cause your Honer will consider and determine the title, claim, interest and encombrance of the respondents in and to the leads here-inbefore described and finally adjudge and decree that the respondents, and each of them, have no right, title, interest in or encombrance upon such lands or any part thereof and that the title of your complainant in and to said lands may be quieted and confirmed in his and the respondents, and each of them, be perpetually en-

joined from heving, Claiming or asserting any right, title, interest in or encumbrance upon said lands or any set thereof and that your completeent by him such other, further and different relief in the granises as may be just the equitable.

Signed Cloyd Q. Magney

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(Signed) Cloyd A. Magney.

The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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WITNESS, Robert S. Duck, Register of said Circuit Court, this of Ctober

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and further to do and perform what said Judge shall order and direct in that behalf. Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

	WITNESS,	Robert S. Duck, Register of said Circuit Court, this	<u> </u>	day
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Circuit Court of Baldwin County, In Equity

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idant shall i	and perform what and no wise omit, under thereon, to our said	er penalty, etc.	. And we fu	rther comm	and that vo	u return this	the said

MOTION

LLOYD A. MAGNEY
Attorney
Foley, Alabama.

Complainant,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

NUMBER 170. ALLINE III

Filed this 2 day of Jan.,

by serving copy of within Summens and Complaint on Lawrence Complaint on Lawrence La

THE PERSON OF TH

6-276

Recorded in Vol. Page	Solicitor for Complainant	9	C. I				VS.		4				SUMMONS	No. 7 0	Serve on William I Cooney. Circuit Court of Baldwin County IN EQUITY
			Deputy Sherii	Ву	MHW Mbecure Sheriff	Defendant		Willein & Corney	by leaving a copy of the within Summons with	0 A 1935	Executed this 2 6 day of	MAM MERCINE SHERIFF	day of, 1933	Received in office this	THE STATE OF ALABAMA, BALDWIN COUNTY

SECONDER OLS 277

HERMAN LAWRENZ,

Complainant,

Z.

WILLIAM E. COONEY, ET AL,

Respondents.

BALDWIN COUNTY, ALABAMA, IN THE CIRCUIT COURT OF

AT LAW.

DEMURRER

Filed this 26th day of Nov.,

	Solicitor for Complainant
	STANDARD MANUAL STANDARD STAND
Deputy Sheriff	
By-	a
Sheriff	
	6
Defendant	
	VS.
by leaving a copy of the within Summons with	
193	
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Received in office this	No.
BALDWIN COUNTY	Circuit Court of Baldwin County IN EQUITY

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Corse M. B. hvol J (borgia)

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(Signed) Cloyd P. Magney

Serve on

No

S U M M O N S

Vs.

Solicitor for Complainant

Solicitor for Complainant

Recorded in Vol.

Page

Deputy Sheriff

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R. J. Na	Mond Dm	by leaving a copy of the within	Executed this	day of Mill	Received in office this	THE STATE OF ALA BALDWIN COUNTY	8 2
Defendant	A A	within Summons wi	O day	, 193		OF ALABAM!	RECORDED

				ੜ	
P. L. W. Sheriff By Mrse Berne Deputy Sheriff	Diverniles 1935 by leaving a copy of the within Summons with Cannel M. Jones	SHERIFF Executed this 20 day of	Received in office this \(\frac{5}{200} \), 1935	THE STATE OF ALABAMA, BALDWIN COUNTY	15-8 Quele 6-276

	Solicitor for Complainant
	despendice encreasitions entrangement of the second
Deputy Sheriff	
By Mire Beamoties	
Sheriff	
R & Wilsonle	
Defendant	
	VS.
Catricle J. Corney	
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day of 1.1000, 1935	SUMMONS
Received in office this	
A THE THE SALE OF	IN EQUITY
BALDWIN COUNTY	

Solicitor for Complainant Recorded in Vol. Page		Vs	S U M M O N S	John R Cooney. c/O State Tex Commission. Redmont Hotel Birmingham. Als. Serve on Circuit Court of Baldwin County
	Defendant Auf M M Muff Sheriff By Miles Korrey Deputy Sheriff	Executed this 10-29 day of the within Summons with Shah 100000000000000000000000000000000000	Received in office this U.S. day of OCT , 1935	THE STATE OF ALABAMA, BALDWIN COUNTY