

88

LAWYERS CO-OPERATIVE PUB-  
LISHING CO., a corporation,

Plaintiff,

-vs-

L. A. MAGNEY,

Defendant.

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

DEMURRER.

Comes now the defendant and demurs to the complaint of the plaintiff, and to each and every count thereof, separately and severally, and as ground for such demurrer says:

That said complaint does not state facts sufficient to constitute a cause of action against the defendant.

  
Attorney pro se.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

~~RECORDED~~  
LAWYERS COOPERATIVE PUB-  
LISHING CO., a corporation,

Plaintiff,

-vs-

L. A. MAGNEY,

Defendant.

DEMURRER.

Filed Nov. 2<sup>nd</sup> 1934  
W. A. Stone  
Clerk

L. A. MAGNEY,  
Attorney pro se.

LAWYERS CO-OPERATIVE PUB-  
LISHING CO., a corporation,

Plaintiff,

-vs-

L. A. MAGNEY,


Defendant.

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

MOTION.

Comes now the above named Defendant and moves the  
Court that the above entitled cause be dismissed for the reason  
that the plaintiff is a non-resident of the State of Alabama and  
has given no security for costs as is required by law.

Dated this 25th day of October, 1934.

  
ATTORNEY PRO SE.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

**RECORDED**

LAWYERS CO-OPERATIVE PUB-  
LISHING CO., a corporation,

Plaintiff,

-vs-

L. A. MAGNEY,

Defendant.

*Filed Oct 26<sup>th</sup> 1934  
By A. S. Jones*

MOTION.

The defendant demands a  
trial by jury.

Lloyd A. Magney,  
Attorney pro se.

THE LAWYERS CO-OPERATIVE  
PUBLISHING COMPANY, a  
corporation,

Plaintiff,

vs.

L. A. MAGNEY,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Count 1. The plaintiff claims of the defendant the sum of  
ONE HUNDRED and SEVEN and 75/100 DOLLARS (\$107.75),  
due from the defendant to the plaintiff by account of, to-wit,  
September 22, 1930, which sum of money, with the interest  
thereon, is still unpaid.

Count 2. The plaintiff claims of the defendant the sum of  
ONE HUNDRED and SEVEN and 75/100 DOLLARS (\$107.75),  
due from the defendant to the plaintiff on account stated  
between the plaintiff and the defendant on, to-wit, September  
22, 1930, which sum of money, with the interest thereon, is  
still unpaid.

Count 3. The plaintiff claims of the defendant the sum of  
ONE HUNDRED and SEVEN and 75/100 DOLLARS (\$107.75),  
due from the defendant to the plaintiff for merchandise, goods  
and chattels sold by the plaintiff to the defendant on, to-wit,  
September 22, 1930, which sum of money, with the interest thereon,  
is still unpaid.

A verified, itemized statement of the account sued  
on is filed herewith and will be introduced in evidence.

  
Attorney for Plaintiff

**YERGER & FOSTER**

**ATTORNEYS AT LAW**

**MOBILE, ALABAMA**

County of Monroe

State of New York

Before me, the undersigned authority in and for said County, in said State, personally appeared Arthur J. Gosnell, who being duly sworn deposes and says that he is

Assistant Treasurer of the Lawyers Cooperative Publishing Company that he has personal knowledge of the attached account of said party against

Lloyd A. Magnus of Foley, Alabama  
in the sum of One hundred seven - - - - - 75-100v- - - - - Dollars;

that same is just, true and correct, and is now due with interest thereon from Sept. 22, 1930,

and that no part thereof has been paid or satisfied, and that there are no offsets or counter claims thereto.

Arthur J. Gosnell

Subscribed and sworn to before me this the

12th day of September, 1934.

F. MacDougall  
Notary Public.

# THE LAWYERS CO-OPERATIVE PUBLISHING COMPANY

ROCHESTER, N. Y.

September 13 19 34

Lloyd A. Hagney  
Foley, Ala.

\$ 137 75

RETAIN LOWER PORTION OF STATEMENT. CANCELLED CHECK IS YOUR RECEIPT. RETURN THIS COUPON WITH CHECK.

## STATEMENT OF ACCOUNT

DATE	ITEMS	CHARGES	CREDITS	BALANCE OWING	NOT YET MATURED	BALANCE DUE
1922	CURRENT					
9/8	ALR 29	7 50				
10/19	ALR 30	7 50				
12/	ALR 31	7 50				
1923						
3/1	Int.	45				
3/2	ALR 32	7 50				
4/24	4 Yr. Dig.	2 50				
	ALR 33	7 50				
6/1	Int.	75				
6/30	ALR 34	7 50				
9/1	ALR 35	7 50				
10/1	Int.	80				
11/7	ALR 36	7 50				
12/31	ALR 37	7 50				
1924						
2/16	Cash		25 00			
3/31	ALR 38	7 50				
5/17	ALR 39	7 50				
6/13	ALR 30	7 50				
8/7	ALR Dig Service 1923	25 50				
9/13	ALR 31	7 50				
11/1	ALR 32	7 50				
11/25	Law Bks & Their Use	1 50				
12/13	ALR 33	7 50				
1925						
1/21	ALR CUM DIG & BLAT BK	5 00				
2/10	Cash		25 00			
2/23	ALR 34	7 50				
4/20	ALR 35	7 50				
5/8	Cash		25 00			
6/24	ALR 36	7 50				
8/26	ALR 37	7 50				
10/22	ALR 38	7 50				
11/12	Cash		25 00			
12/15	ALR 39	7 50				
1926						
2/22	ALR DIG 1925 & SUPP DEC	5 00				
3/11	Cash		25 00			
3/5	ALR 40	7 50				
5/1	ALR 41	7 50				
6/17	ALR 42	7 50				
8/26	ALR 43	7 50				
10/20	ALR 44	7 50				
12/21	ALR 45	7 50	Forward			

\* ITEMS STARRED, FORWARDED RECENTLY--IF NOT DELIVERED, DEDUCT FROM AMOUNT DUE.

PLEASE PAY THIS AMOUNT →

In account with The Lawyers Co-operative Publishing Company, Rochester, N. Y.

Date \_\_\_\_\_

Paid \$ \_\_\_\_\_

Check No. \_\_\_\_\_

SUMMONS AND COMPLAINT

MOORE PRINTING CO., BAY MINETTE, ALA.

THE STATE OF ALABAMA,  
Baldwin County.

No. 88

CIRCUIT COURT

October 1934

To Any Sheriff of the State of Alabama:

You are hereby commanded to summon L. A. Magney

to appear and plead, answer or demur, within thirty day from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama at Bay Minette, Ala., against

L. A. Magney Defendant by The Lawyers Co-Operative Publishing  
Company, a corporation,

Plaintiff

Witness my hand this 11th day of October 1934

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.



Decket Page 89

ORIGINAL

No. 88

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

The Lawyers Co-operative Publishing  
Company, a Corporation,  
PLAINTIFF  
vs.

L. A. Magney  
DEFENDANT

Summons and Complaint

Filed, October 11th, 1934

M. A. Stone, Clerk.  
Defendant Lives at

Frank J. Yerger, Plaintiff's Attorney.

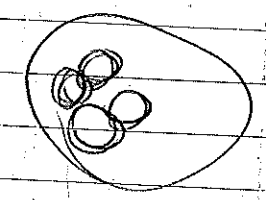
Defendant's Attorney

MOORE PRINTING CO., BAY MINETTE, ALA.

RECEIVED IN OFFICE  
Oct 12th, 1934  
W. R. Stuart, Sheriff

I have executed this Writ  
this 15th October, 1934  
by leaving a copy of the within Summons and  
Complaint with  
L. A. Magney

RECORDED



W. R. Stuart, Sheriff.  
Deputy Sheriff.

# THE LAWYERS CO-OPERATIVE PUBLISHING COMPANY

ROCHESTER, N. Y.

September 13 1934

Lloyd A. Hagney  
Poley, Ala.

\$107 75

RETAIN LOWER PORTION OF STATEMENT. CANCELLED CHECK IS YOUR RECEIPT. RETURN THIS COPY

## STATEMENT OF ACCOUNT

DATE	ITEMS	CHARGES	CREDITS	BALANCE OWING	NOT YET MATURED	BALANCE DUE
1927	Forward					
1/25	AIR GUM DIS & BLUE BK	5 00				
3/1	ALR 46	7 50				
4/22	ALR 47	7 50				
6/7	Int.	2 00				
10/5	Int.	2 30				
1928						
1/10	Int.	1 75				
4/10	Cash		10 00			
6/15	Int.	2 25				
9/26	Int.	2 10				
1929						
2/25	Int.	2 10				
3/12	Cash		13 50			
5/1	Int.	95				
9/30	Int.	1 70				
1930						
5/30	Int.	3 40				
9/22	Int.	1 70		107 75		107 75

\* ITEMS STARRED, FORWARDED RECENTLY—IF NOT DELIVERED, DEDUCT FROM AMOUNT DUE.

PLEASE PAY THIS AMOUNT

107 75

In account with The Lawyers Co-operative Publishing Company, Rochester, N. Y.

Date

Paid \$

Check No.

Filed Oct 11<sup>th</sup> 1934  
W. A. Stone  
Clerk