

100

W. E. COONEY,

Plaintiff,

VS.

M. A. HAYS,

Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 100

Comes the Defendant and for answer to the Complainant's complaint, and to each count thereof, separately and severally, says:

FIRST:

That the facts therein alleged are untrue.

SECOND:

That the account sued on was paid before the commencement of this suit.

Asst. Clerk

Berk & Son
Attorneys for Defendant.

100 RECORDED

Duck
7-277

W. E. COONEY,

PLAINTIFF,

VS.

M. A. HAYS,

DEFENDANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 100

Filed this 21 day of Aug.
1935.

Robert S. Duck
Clerk.

W. E. Cooney

vs.

M. A. Hays

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

I, M. A. Stone, Register of said Court, do hereby certify that I

did, on the 8th day of December 1924, send to M. A. Hays

Defendant.

whose address was Louisville, Ky.,

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 14th day of Dec. 1924.

Witness my hand, this 14th day of Dec. 1924.

M. A. Stone

Register.

~~RECORDED~~
No. 100

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

H. E. Cooney

vs.

M. A. Hays

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 14th

day of December 1923

M. A. Hays
Register.

THE STATE OF ALABAMA,
Mobile County

OATH

County,

John N. Allen, a Notary Public in and for said State and/

Personally came before me, ~~EX-OFFICIO CLERK INFERIOR COURT OF MOBILE~~

W. E. Cooney, who being duly sworn, deposeth and

saith that M. A. Hays

is justly indebted to him

in the sum of Two Hundred Eighty-Nine & 30/100 Dollars;

that the said M. A. Hays is a non-resident of the State of Alabama;

and that this Attachment is not sued out for the purpose of vexing or harassing the said defendant, or other improper motive.

Sworn to and subscribed before me this 31st day of October, 1934.

~~EX-OFFICIO CLERK INFERIOR COURT OF MOBILE~~
Notary Public, Mobile County, Alabama.

W. E. Cooney

THE STATE OF ALABAMA,
Mobile County

Know All Men by These Presents:

That we,

are held and firmly bound unto

in the sum of Dollars

to be paid to the said, his heirs, executors, administrators or assigns, for payment of which well and truly to be made, we bind ourselves, and each of us, our, and each of our heirs, executors and administrators, jointly, severally and firmly by these presents.

Sealed with our seals and dated this day of A. D., 193

The condition of the above obligation is such, that whereas, the above bound

has on the day and date hereof prayer an attachment, at the suit of against the estate of the

above named

for the sum of Dollars

and has obtained the same, returnable to the Inferior Civil Court of Mobile, at the office, in the city

of Mobile, on the day of

Now, if the said Plaintiff shall prosecute said attachment to effect, and pay the defendant all such damages as he may sustain from the wrongful and vexatious suing out of such attachment, then this obligation is void, otherwise to remain in full force and effect.

Approved the day of

(L. S.)

(L. S.)

(L. S.)

Ex-Officio Clerk Inferior Civil Court of Mobile

RECORDED
copy

Inferior Civil Court of Mobile

No. 100

Ret., 193.....

**OATH AND BOND
FOR ATTACHMENT**

Continued to 193.....

Continued to 193.....

VS. } Attachment.

Claim, \$.....

Cost, \$.....

*Filed for 1st 1934
W. A. Stone
Clerk.*

W. E. COONEY,
Plaintiff,

VS

M. A. HAYS,
Defendant.

KNOW ALL MEN BY THESE PRESENTS , that pursuant to a writ issued by the Circuit Court of Baldwin County in a suit therein pending wherein W. E. Cooney is Plaintiff and M. A. Hays is Defendant, an attachment is levied by the undersigned as Sheriff of Baldwin County upon the following described property:

East Half of Northwest Quarter of Southwest Quarter of Section 27 -- 7 South Range 4 East, 20 acres more or less.

Which said levy constitutes a lien on said property in favor of the Plaintiff aforesaid.

All persons are therefore cautioned against purchasing said lands or seeking to acquire any title or interest therein, except subject to the rights of the Plaintiff under this notice of lis pendens, as same shall be ascertained and declared by the Circuit Court in this litigation.

Done by Bay Minette this the 20 day of November, 1934.


Sheriff of Baldwin County.

RECORDED

W.E. Cooney, Plaintiff,

VS

M. A. Hays, Defendant.

lis Pendens Notice.

State of Alabama, }
Baldwin County, } Probate Court.

Filed in office this 20 day of Nov
1934, at 11125971 and duly recorded
in Book No. 1 at page 140
and I certify that Deed
tax and etc. Mtge tax has
been paid as required by law.

St. Humphries
Judge of Probate
by J. B. Hessler Clk.

Filed 11/20/34

M. A. Stoner, Clerk

M. A. Hays

To

W. E. Cooney, Dr.
Foley, Ala.

D R:		
Date	Items	Debits
Sept. 1, 1928 ✓	Insurance Policy ACP 162917 (Hartford Accident & Indemnity Company)	\$20.00 ✓
Mar. 19, 1929	License Pontiac Automobile (B)	19.75
Sept 1, 1929 ✓	Insurance Policy ACP 281098 (Hartford Accident & Indemnity Company)	13.50
Sept. 1, 1930 ✓	Southern Surety Company Insurance Policy Premium AP-8-040034	15.30
June.20, 1931	Southern Surety Company Insurance Policy Premium AP-8-56161	17.00 ?
Sept. 1, 1931 ✓	Southern Surety Company Insurance Policy Premium AP-8-94069	21.60 ✓
Aug. 6, 1930	Globe & Rutgers Insurance Policy Premium #4781512 Household Goods	43.05 ?
Aug 6, 1930	Globe & Rutgers Insurance Policy Premium #4781511 (Garage)	15.90
Aug 6, 1930	Globe & Rutgers Insurance Policy Premium #4297085	45.00
Aug 6, 1931	Globe & Rutgers Insurance Policy Premium #4782264 (Household Goods)	43.05 ?
Nov 19, 1931	Globe & Rutgers Insurance Policy Premium #4782298 (House)	62.10
Aug. 1932	Insurance Premium on Household Furniture	43.05
Total		359.30
C R:		
		Credits
Jan 30, 1932	Check	50.00
	Check	20.00
Total		70.00
Balance		\$289.30

STATE OF ALABAMA,

COUNTY OF MOBILE.

Before me, John N. Allen, a Notary Public in and for said State and County, personally appeared W. E. Cooney, who is known to me and who, being by me first duly sworn, deposes and says that he has personal knowledge of the account between himself and M. A. Hays; and that the attached itemized statement of his account against the said M. A. Hays, showing a balance due by the said M. A. Hays of Two Hundred Eighty-Nine & 30/100 Dollars is just, true and correct, after allowing all proper credits, set-offs and counter-claims.

W. E. Cooney

Subscribed and sworn to before me

this 3rd day of October, 1934.

John N. Allen

Notary Public, Mobile County, Ala.

No 100

RECORDED

Civil

W. E. Cooney

VS

M. A. Hays

Account

Filed, Nov. 1st 1994
J. A. Stone
Clerk

W. E. COONEY,

Plaintiff,

VS.

M. A. HAYS,

Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 100

Comes the Defendant and for answer to the Complainant's
complaint, and to each count thereof, separately and severally,
says:


FIRST:

That the facts therein alleged are untrue.

SECOND:

That the account sued on was paid before the commence-
ment of this suit.




Attorneys for Defendant.

COPY
W. E. GOONEY,

PLAINTIFF,

VS.

H. A. HAYS,

DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

AT LAW

NO. 100

Filed this 20 day of Aug.
1935.

Robert L. Black
Clerk.

W. E. Cooney,
Plaintiff.

vs.

M. A. Hayes,
Defendant.

In the Circuit of Baldwin County,
Alabama.

Now comes the defendant in the above stated case and appears specially and for the sole purpose of moving the Court to quash the service in this cause, and for ground thereof says:

Copies of all papers were not served on the defendant as required by law.

A. H. Smith
Defendant's Attorney.

100
RECEIVED
Dec 12

In the Circuit Court
of Baldwin County, Alabama.

W. E. Cooney

vs.

M. A. Hays.

Filed Jan. 11, 1935

M. A. Stone

A. H. Crovatt,
Defendant's Attorney.

RECEIVED
JAN 11 1935
CLERK OF COURT
BALDWIN COUNTY, ALA.
FILED
100
W. E. COONEY
VS.
M. A. HAYS
A. H. CROVATT
ATTORNEY
FOR DEFENDANT

The State of Alabama, }
Baldwin County

TO ANY SHERIFF OF THE STATE OF ALABAMA;

WHEREAS, W. E. Cooney

M. A. Stone
hath complained on oath to me, ~~T. W. Robinson~~, Clerk of Circuit Court of Baldwin County,
Ala., that M. A. Hays

is justly indebted to the Plaintiff W. E. Cooney

in the sum of Two Hundred and eighty nine and 30/100 Dollars, and

W. E. Cooney having made affidavit and given bond
as required by law, in such cases, you are hereby commanded to attach so much of the estate of

~~W. E. Cooney~~ M. A. Hays

as will be of value sufficient to satisfy said debt and costs, according to the complaint; and such
estate, so attached unless replevied, so to secure, that the same may be liable to further pro-
ceedings thereon to be had by the Circuit Court of Baldwin County, Ala., at a term thereof, to be
held at the Court House of said County, on _____ Monday of _____

_____ 19____ next; when and where you must make known to said Court how
you have executed this Writ,

WITNESS, my hand, this 1st day of November A. D. 1934

M. A. Stone Clerk.

Planted 11/2/34
by attaching the
2 1/2 of NW 1/4 of
SW 1/4 Sec 27-
7 S 4 East, 20 acres
more or less as
the property of
Ma Hays-
W. E. Cooney
Sherriff

Docket Page 90

RECORDED

No. 100

ATTACHMENT

W. E. Cooney

Vs. } Attachment

M. A. Hays,

Issued 11/1/34 192

Moore Printing Co. :::: Bay Minette, Ala.

Bay Minette, Ala., Nov 20 1934

W. L. Stone Cur Off

IN ACCOUNT WITH
G. W. HUMPHRIES
JUDGE OF PROBATE, BALDWIN COUNTY

Please Return Bill With Remittance.

Privilege Tax

Rec. Fee

Total

Deed
Rec. Mort. from

W. E. Conroy to W. A. Hays

Paid

11/20/34
G. W. Humphries Judge
Bay Minette, Ala.

25

Revised 11/2/34
by attaching the
2 1/2 of NW 1/4 of
SW 1/4 Sec 27-
7 S 4 East. 20 acres
more or less as
the property of
M A Hays -
W R Stewart
Sheriff

Docket Page 90

RECORDED

No. 100

ATTACHMENT

W. E. Cooney

Vs. } Attachment

M. A. Hays,

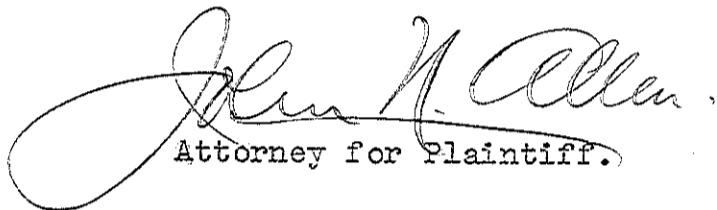
Issued 11/1/34 192

Moore Printing Co. Bay Minette, Ala.

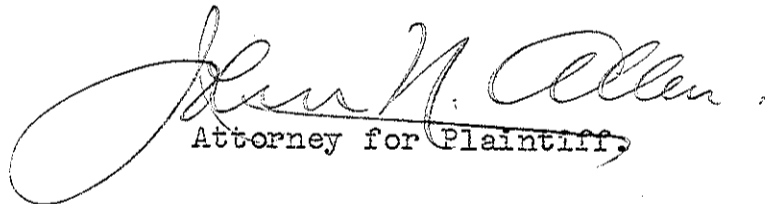
W. E. COONEY,
Plaintiff,
-vs-
M. A. HAYS,
Defendant.

No. _____
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

1. The plaintiff claims of the defendant the sum of Two Hundred Eighty-nine & 30/100 Dollars, due from him by account between the 19th day of March, 1929, and the 31st day of September August, 1932; which sum of money, with the interest thereon, is still unpaid.


Attorney for Plaintiff.

The account sued on is itemized and verified by affidavit, and same is filed with the complaint in this cause.


Attorney for Plaintiff.

The defendant is a non-resident of the State of Alabama, his address and place of residence being "c/o Immigration Department, L. & N. R. R. Co., Louisville, Ky.

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APR 1 1934

FILED
APR 1 1934
W. A. Stone
Clerk

RECEIVED
F. B. I.
APR 1 1934

THE STATE OF ALABAMA,
Baldwin County.

No. 100

CIRCUIT COURT

November 1st, 1934. 193

To Any Sheriff of the State of Alabama :

You are hereby commanded to summon M. A. Hays

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

M. A. Hays.

Defendant

by

W. E. Cooney

Plaintiff

Witness my hand this 1st day of November 1934

Clerk.

COMPLAINT

Plaintiff versus

The Plaintiff claims of the Defendant

Dollars, due by

Plaintiff's Attorney.

No. 100

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

W. E. COONEY
PLAINTIFF
VS.

M. A. HAYS
DEFENDANT

Summons and Complaint

Filed, November 1st, 1934
J. A. Stone, Clerk

Defendant Lives at
M. A. Hays,
c/o Immigration Department,
L. & N. R.R. Co.,
Louisville, Ky.,
(John N. Allen) Plaintiff's Attorney.

Defendant's Attorney

RECEIVED IN OFFICE

, 193

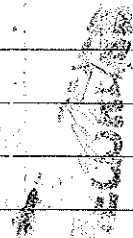
, Sheriff

I have executed this Writ

this, 193

by leaving a copy of the within Summons and Complaint with

Returned 11/20/34
M A Hays not
found in
Baldwin Co



W. R. Stunt

, Sheriff.

, Deputy Sheriff.

18-11-1906
 4600
 18-11-1906
 4600
 18-11-1906
 4600

RETURN RECEIPT
 Received from the Postmaster the Registered or Insured Article, the original
 of which appears on the face of this Card.
 Registered to _____
 Date of delivery _____
 1906