

STATE OF ALABAMA ) IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ) BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to summon William Schneider to appear at the next term of the Circuit Court to be held for said County at the place of holding same, then and there to answer the Complaint of W. E. Cooney.

*Alicia J. Smith*

COMPLAINT

W. E. COONEY, )  
Plaintiff )  
-vs- )  
WILLIAM SCHNEIDER, )  
Defendant )  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

COUNT ONE

The Plaintiff claims of the Defendant Three Hundred Eight & 21/100 Dollars (\$308.21) due from him on accounts stated by the Plaintiff and the Defendant on the 28th day of May, 1947, which sum of money with the interest thereon is still unpaid.

COUNT TWO

The Plaintiff claims of the Defendant Three Hundred Eight & 21/100 Dollars (\$308.21) for money paid by the Plaintiff for the Defendant on to-wit: May 28th, 1947, at his request, which sum of money with the interest thereon is still unpaid.

COUNT THREE

The Plaintiff claims of the Defendant Three Hundred Eight & 21/100 Dollars (\$308.21) for money paid by the Plaintiff to the Home Insurance Company for policies No. 1026, Policy No. 1119, for the Defendant, and at his request, which sum of money with the interest thereon is still unpaid and is the property of the Plaintiff.

*[Signature]*  
Attorney for Plaintiff

RECORDED

1131 RECORDED

COMPLAINT

Received in Sheriff's Office  
this 6 day of Jan., 1948  
TAYLOR WILKINS, Sheriff

Executed By Serving a copy  
Summons & Complaint on  
William N. Schneider  
12 day Jan 1948  
Taylor Wilkins Sheriff  
Zeller B. Griffin U.S.

W. E. COONEY,

Plaintiff

-VS-

N.  
WILLIAM SCHNEIDER,

Defendant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

FILED

JAN 6 1948

ALICE J. DUCK, Clerk

CECIL G. CHASON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

W. E. COONEY,

Plaintiff,

-vs-

WILLIAM SCHNEIDER,

Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

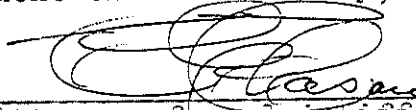
LAW SIDE

Now comes Annie M. Jones, as executor of the Last Will and Testament of the plaintiff, W. E. Cooney, deceased, and shows unto the court that the plaintiff, W. E. Cooney, departed this life on, to-wit, March 20th, 1948, and Annie M. Jones has been duly appointed executor of the Last Will and Testament of the said W. E. Cooney, deceased, and has qualified as such.

Wherefore, Annie M. Jones, as executor aforesaid, moves that this cause be revived as to W. E. Cooney by the substitution of Annie M. Jones as executor of the Last Will and Testament of W. E. Cooney, deceased, as plaintiff.

Annie M. Jones,  
Executor of Last Will and Testa-  
ment of W. E. Cooney, deceased,

By

  
Attorney for plaintiff and  
Attorney for the Estate.

FOLEY, ALA., May 28, 1947

Mr. William Schneider

TO W. E. COONEY INSURANCE AGENCY, DR.

FIRE, TORNADO, MARINE  
WORKMEN'S  
COMPENSATION,  
PHONE 53

P. O. BOX 13

REAL ESTATE, RENTALS  
AND MORTGAGE LOANS

HEALTH, ACCIDENT  
AUTOMOBILE, CASUALTY  
GENERAL LIABILITY  
SURETY BONDS

11-9-45

Home Insurance Company Policy #1026

Short Rate Cancellation Home Policy #1119

Policy in effect 195 days

Less repairs to Chevrolet

BALANCE DUE

224.00

163.52

387.52

79.31

308.21

2841.00  
Total \$349.81

(over)

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said County in said State, personally appeared Pearl Duncan, who after being by me first duly and legally sworn, deposes and says that her name is Pearl Duncan; that she is over the age of twenty-one years and a resident of Baldwin County, Alabama; that she is the manager of the W. E. Cooney Insurance Agency of Foley, Alabama; that the policies hereinabove specified were issued to William Schneider and that they were issued at the request and direction of William Schneider; that the amount of \$308.12 as hereinabove shown, plus the interest thereon, is still due and unpaid, after allowing all just credits and offsets.

Pearl Duncan

Sworn to and subscribed before me  
a Notary Public, on this the 14th  
day of February, 1949.

Cecil G. Chason  
Notary Public, Baldwin County  
State of Alabama

28113