THOMAS J. COONEY and PAT J. COONEY, as executors of the estate of P. J. Cooney, deceased, Plaintiffs. FOLEY HOTEL COMPANY, a corporation,

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

Plaintiffs claim of the defendant the sum of Three Hundred Forty and 89/100 Dollars (\$340.89), due from it by account on the 9th day of August, 1928; which sum of money, with the interest thereon, is still unpaid.

Defendant.

Attorney for Plaintiffs.

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

Attorney for Plaintiffs.

-to-

Thomas J. Cooney and Pat J. Cooney, executors of the estate of P. J. Cooney, deceased,

| 1927 | | | |
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| Objection and other constitution | .Nay 12th - | Continental Insurance Policy | A participation of the Control of States and |
| | | #140 (Builders' Risk)\$120.00 | |
| | | Home Ins. Co. of New York, | |
| | | #401 (Builders' Risk) 87.50 | |
| | | Home Fire & Marine Policy #16768 (Builders' Risk) | |
| | | | Control of the Control |
| | Aug.10th - | Virginia Fire & Marine Policy #329262 (Builders' Risk) 67.50 | |
| | · · Oat Blat- | Royal Indemnity (Plate Glass) 59.39 | |
| 1020 _ | | Virginia Fire & Marine Policy | |
| 1500 - | · Odit · Domi- | #329267 (Straight Fire) 303.00 | |
| 1.1 | Jan. 26th- | Home Fire & Marine (Straight | 4 |
| • | 000224 | Fire) 303.00 | |
| * * * . | Jan. 26th- | Home Ins. Co. of New York Policy | |
| | | #413 (Straight fire) 303.00 | |
| | Aug. 9th- | Home of New York Policy #1003, | 1.00 1.00 |
| | . " | (Tornado) | |
| | | Total | \$1540.89 |
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| 1930 | | | And the second s |
| | Jan-Olst - | By check400.00 | \$1000.00 |
| | | | \$1000 \$ 00 |
| | | Balance due | .\$ 340.89 |
| STATE | OF ALABAMA | | |

STATE OF ALABAMA, COUNTY OF BALDWIN.

Before me, County, personally appeared William E. Cooney, who is known to me and who, being by me first duly sworn, de poses and says that he is bookkeeper of the estate of P. J. Cooney, deceased; that he has personal knowledge of the account of said estate against Foley Hotel Operating Company; and that the foregoing itemized statement of said account, showing a balance of \$340.89 due by said Foley Hotel Operating Company is true and correct, after allowing all proper credits, set-offs and counter clairs.

Sabscribed and sworn to before me

Necary Public, Baldwin County, Ala.

The State of Alabama, BALWIN

____County

| | | | CIRCUIT | COURT |
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The State of Alabama BALDWIN

.....County

CIRCUIT COURT

THOMAS J. COONEY and PAT J. COONEY, as executors of the estate of P.J.COONEY, deceased, Plaintiff.....

FOLEY HOTEL COM-

PANY, a corporation

Defendant.....

Summons and Complaint

Filed this 14th day of

Clerk.

JOHN N.ALLEN

Plaintiff's Attorney.

| of | , 19 |
|-------------------|--|
| | Million, Sheriff. |
| Executed this | day |
| of Chric | , 19 <mark>32</mark> , by ithin Summons and Com- |
| plaint with Buely | es Sesatary |
| 2 Och p | Defendant |
| | Sheriff. |

| 1 | 'he | State | of | Ala | bar | na | , |
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COUNTY

To the Sheriff of

Whereas, the Plaintiff in the within stated cause ha..... made affidavit and given bond as required by law, you are hereby required to take the property mentioned in the complaint into your possession, unless the Defendant...... give...... bond payable to the Plaintiff..... with sufficient surety in double the amount of the value of the property, with condition that if the Defendant

cost in the suit..... within thirty days thereafter, deliver the property to the Plaintiff....., and pay all costs and damages which may accrue from the detention thereof.

JOHN N.ALLEN ATTORNEY AT LAW VAN ANTWERP BUILDING MOBILE, ALABAMA April 14th, 1952. Hon. T. W. Richerson, Clerk, Circuit Court, Bay Minette, Ala. Dear Mr. Richerson: I would consider it a favor if you would forward to me, in the enclosed stamped envelope, the complaint and verified statement of account filed by me in the case of Cooney vs. Foley Hotel Operating Company.

Mr. Magney, for which I thank you.

JWA:NM

John N. Allen

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THOMAS J. COONEY AND PAT J. COONEY, AS EXECUTORS OF THE ESTATE OF P. J. COONEY, DECEASED,

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

PLAINTIFFS

VS

DEMURRER

FOLEY HOTEL OPERATING COMPANY, A CORPORATION,

DEFENDANT

Comes now Foley Hotel Operating Company, the above named

Defendant, and demurrers to the complaint and as ground for

such demurrer says:

That the complaint does not state a cause of action against the Defendant in this that in said complaint Foley Hotel Company, a corporation is sued and the cause of action, if any, is against said Foley Hotel Company and not against this Defendant.

Attorney for Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

RECORDED

THOMAS J. COONEY AND PAT J. COONEY, AS EXECUTORS OF THE ESTATE OF P. J. COONEY, DECEASED,

PLAINTIFFS

vs

FOLEY HOTEL OPERATING COMPANY, A CORPORATION.

DEFENDANT

Filed Opil 9cm/932 Interna Clark

DEMURRER

LLOYD A. MAGNEY, Attorney for Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA AT LAW

RECORDED

THOMAS J. COONEY AND PAT.
J. COONEY, AS EXECUTORS
OF THE ESTATE OF P. J.
COONEY, DECEASED,

PLAINTIFFS

VS

FOLEY HOTEL OPERATING COMPANY, A CORPORATION,

DEFENDANT

Filed Phail 9cm/932 De Minum Clush

DEMURRER

LLOYD A. MAGNEY, Attorney for Defendant.

The State of Alabama Baldwin County

No. 9642 AN BO Term, 193

To Any Sheriff of the State of Alabama -- Greeting:

| You are hereby commanded. That | of the goods | and chattels, lands and tenements of — | |
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| Taley Hatel | Pom | pany D | efendants, |
| | 11 90 | | |
| you cause to be made the sum of | | | Dollars, |
| which Thas . J. Cooney | + Pat | corregion | Plaintiffs |
| J. J. | 344 | day of January 1 | .93 左 by |
| Allandar Carlotte and Carlotte et 1986 et 1 | Law State Control | | 7. 30) |
| the Judgment of our Circuit Court, he | eld for the Co | anty of Baldwin, besides the sum of | |
| Turke and Ind | nty ! | me hundredtles - | Dollars |
| | | M Q Stone | , |
| costs of suit, and have the same to reno | | | |
| and make return of this Writ and the e | xecution there | | •. |
| Interest from | | , 193, to date of collection. | |
| Witness my hand, this | day of | turning 193 7 | |
| | | m a stone | Clerk |
| CLERK'S FEES | AMOUNT | 6 SHERIFF'S FEES | AMOUNT |
| | 1 25 | For Levying an Attachment \$3.00 | |
| For every Summons & Complaint \$1.25 Each copy thereof 30 | 30 | Entering and Returning Attachment 25 | |
| Intering a Sheriff's Return 20 | | Summoning Garnishee 1.50 | man and the second process of the second sec |
| Docketing 25 | 22 | Serving Summons on Writ 1.50 | 150 |
| Entering Appearance 20 | 20 | Serving Notice Sci. Fa. Notice, etc. 65 | |
| Filings 10 | | Serving Subpoenas 65 | |
| Every order made in Court 30 | | Empanelling Jury 75 | and the same of the same |
| Copy thereof 25 Every Trial with or without Jury 75 | 75 | Entering and Returning Execution 25 | |
| Entering up Judgment or copy thereof 30 | 4. | Collecting Cost Execution 1.50 Executing a Writ of Possession 2.50 | 1 1 - |
| Ssuing Execution 50 | 25 | Executing a Writ of Possession 2.50 Taking and Approving Bonds 1.00 | |
| Docketing Execution 25 | 10 | Commissions | |
| Entering Return on Execution 20 | 1-17 | Sheriff's Commission for Property | |
| Issuing Subpoenas 30 Administering Oath 25 | | Sold under Attachment | |
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| Issuing each Attachment, taking bond 1.00 | | of Detinue 3.00 | |
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| Each Summons for Garnishee 50 | 1 | RECAPITULATION | - |
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| Notice to Deft. in Garnishee on Sum- | | Judgment for for \$ | 510 90 |
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| Commissions to take Depositions or Copy 75 | | Damages | 1 Jan |
| Order to Execute Writ of Inquiry 30 | | Clerk's Fees | 1 3/60 |
| Copy of Interrogatories. 15c per | | Sheriff's Fees | 3/40 |
| hundred words or 50 | 888 Am Chr. | Justice of Peace Fees | |
| Filing each Deposition and en- | | Witness Fees in Justice of Peace Cour | |
| dorsing same 20 | 175 | Constable's Fees Commissioner's Fees | |
| Final Record, per hundred words 15 Every Certificate 50 | / | Commissioner's Fees Printer's Fees | |
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| Continuance 3 10 | § 1 | Trial Tax \$3.00 | |
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| THE STATE OF ALABAMA, Baldwin County | GOMEGI GOOT TROAL | |
| CIRCUIT COURT | THE STATE OF ALABAMA, | |
| J. J. Cooney | Baldwin County I hereby certify that the within Judgment | |
| Plaintiffs | and Costs in this case are correct, and there was a waiver of exemption as to personal property under the Constitution and Laws of | |
| vs. | Alabama. | |
| Folia Untel Co | This day of 193 | |
| Defendants | Clerk. | gani di Saran |
| CIVIL EXECUTION | RECEIVED IN OFFICE | |
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| M. Stone Clerk. | | |
| Plaintiff's Attorney. | |) |
| Defendant's Attorney. | | |

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| THE STATE OF ALABAMA, | COLLECT COST FROM | | | la. Distriction of the second section of the second |
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| CIRCUIT COURT | THE STATE OF ALABAMA, | | | |
| 10000 | Baldwin County | | | |
| V. J. Concey | I hereby certify that the within Judgment | clock, | | |
| - Car Chilmen | I hereby certify that the within Judgment and Costs in this case are correct, and there was a waiver of exemption as to personal property under the Constitution and Laws of | o.cl | | |
| vs. Plaintiffs | property under the Constitution and Laws of Alabama. | evied - | | 黎 医杏二基二氢二基二氢基乙二基二 |
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| Plaintiff's Attorney. | | publication of the state of the | | |
| Defendant's Attorney. | | | | |