

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

Plaintiffs,

-vs-


FOLEY HOTEL ~~COMPANY~~ COMPANY, a cor-
poration,

Defendant.


No. _____

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

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


Attorney for Plaintiffs.

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


Attorney for Plaintiffs.

Foley Hotel ~~Operating~~ Company,
Foley, Alabama,

-to-

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

1927

May 12th	- Continental Insurance Policy #140 (Builders' Risk).....	\$120.00
June 7th	- Home Ins. Co. of New York, #401 (Builders' Risk).....	87.50
Aug. 13th	- Home Fire & Marine Policy #16768 (Builders' Risk).....	67.50
Aug. 13th	- Virginia Fire & Marine Policy #329262 (Builders' Risk).....	67.50
Oct. 31st	- Royal Indemnity (Plate Glass)...	59.39
1928 - Jan. 26th	- Virginia Fire & Marine Policy #329267 (Straight Fire).....	303.00
Jan. 26th	- Home Fire & Marine (Straight 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, (Tornado).....	30.00
	Total.....	\$1340.89

Credits

1928	June	- In shares of stock.....	\$300.00
		By check.....	300.00
1930	Jan. 31st	- By check.....	400.00
		Total.....	\$1000.00
		Balance due.....	\$ 340.89

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, Clara K. McManis, a Notary Public
in and for said State and 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 es-
tate 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 allow-
ing all proper credits, set-offs and counter claims.

Subscribed and sworn to before me
this 11 day of March, 1932.

Clara K. McManis
Notary Public, Baldwin County, Ala.

The State of Alabama, BALDWIN County

CIRCUIT COURT

To Any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon FOLEY HOTEL OPERATING COMPANY,
a corporation,

to appear in the Circuit Court of BALDWIN County, Alabama, at the place
of holding the same and plead, answer, or demur, within thirty days from service hereof to the complaint of
THOMAS J. COONEY and PAT J. COONEY, as executors of the estate of
P. J. Cooney, deceased,

Witness this 14th day of March, 19 32

O. M. Robinson, Clerk.

IF THE DEFENDANT FAILS TO APPEAR AND PLEAD, ANSWER OR DEMUR WITHIN
THIRTY DAYS AFTER SERVICE THE PLAINTIFF MAY TAKE JUDGMENT BY DEFAULT.

COMPLAINT

VS.

Plaintiff

Defendant

And the Plaintiff claim of the Defendant

Dollars, due

(ORIGINAL) **RECORDED**
No. 436

The State of Alabama
BALDWIN County

CIRCUIT COURT

THOMAS J. COONEY and PAT J.
COONEY, as executors of the
estate of P. J. COONEY, de-
ceased, Plaintiff

vs.

FOLEY HOTEL ~~COMPANY~~ COM-
PANY, a corporation

Defendant.

Summons and Complaint

Filed this 14th day of

MARCH 19 32

J. N. Allen
Clerk.

JOHN N. ALLEN

Plaintiff's Attorney.

Burley

Received this _____ day
of _____, 19____

RECORDED
436
_____, Sheriff.

Executed this 5th day
of April, 1932, by

leaving a copy of the within Summons and Com-
plaint with
Mr. Burley, as Secretary
of Foley Hotel Company
a Corp Defendant.
W. R. Stewart
Sheriff.

The State of Alabama,
_____ COUNTY

To the Sheriff of _____ County:

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.

_____, Clerk.

JOHN N. ALLEN

ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE, ALABAMA

April 14th, 1932.

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.

I received copy of the demurrer filed in this case by Mr. Magney, for which I thank you.

Yours very truly


John N. Allen

JNA:NM

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

PLAINTIFFS

VS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

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
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 April 9th 1932
J. W. Williams
Clerk

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 April 9th 1932
J. W. Williams
Clerk

DEMURRER

LLOYD A. MAGNEY,
Attorney for Defendant.

The State of Alabama }
Baldwin County }

CIRCUIT COURT

No. 9642 Jan 30 Term, 1934

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

You are hereby commanded, That of the goods and chattels, lands and tenements of _____

Talley Hotel Company Defendants,

you cause to be made the sum of 510.90 Dollars,

which Thos. J. Cooney + Pat Cooney Plaintiffs

recovered of it on the 29th day of January 1934 by Alfred J. ...

the Judgment of our Circuit Court, held for the County of Baldwin, besides the sum of \$12.00

Twelve and Twenty one hundredths - Dollars

costs of suit, and have the same to render to the said M. A. Stone

and make return of this Writ and the execution thereof, according to law.

Interest from _____, 193____, to date of collection.

Witness my hand, this 7th day of February 1934

Wm. R. Stone Clerk

[illegible]

No. 9642

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT

J. J. Cooney
Pat Cooney
vs.

Plaintiffs

Gley Hotel Co

Defendants

CIVIL EXECUTION

Judgment for _____ for \$ 510.90

Interest from _____ 193 _____

to _____ 193 \$ _____

Damages _____ \$ _____

Costs _____ \$ 12.20

Total - - - - \$ _____

Civil Fee Book 4 Page 569

Execution Docket 4 Page 254

Filed Feb. 7 1934

M. A. Stone

Clerk.

John N. Allen

Plaintiff's Attorney.

Floyd A. Magney

Defendant's Attorney.

COLLECT COST FROM

THE STATE OF ALABAMA,
Baldwin County

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
Alabama.

This _____ day of _____ 193 _____

Clerk.

RECEIVED IN OFFICE

193 _____

Sheriff

Sheriff's Execution Docket, Page _____

Sheriff's Fee Book, Page _____

Clerk's Civil Fee Book, Page _____

Clerk's Civil Execution Docket, Page _____

The State of Alabama }
Baldwin County

By virtue of the within execution, I have, at _____ o'clock, _____ M., this

_____ day of _____ 193 _____, levied

No. 9642

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT

J. J. Cooney
Pat Cooney
vs. Plaintiffs

Goley Hotel Co
Defendants

CIVIL EXECUTION

Judgment for _____ for \$ 510.90

Interest from _____ 193 _____

to _____ 193 \$ _____

Damages _____ \$ _____

Costs _____ \$ 12.20

Total - - - - - \$ _____

Civil Fee Book 4 Page 569

Execution Docket 4 Page 254

Filed Feb. 7 1934

M. A. Stone
John N. Allen Clerk.

Gloyd A. Wagner
Plaintiff's Attorney.
Defendant's Attorney.

COLLECT COST FROM

THE STATE OF ALABAMA,
Baldwin County

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
Alabama.

This _____ day of _____ 193 _____

Clerk.

RECEIVED IN OFFICE

193 _____

Sheriff

Sheriff's Execution Docket, Page _____

Sheriff's Fee Book, Page _____

Clerk's Civil Fee Book, Page _____

Clerk's Civil Execution Docket, Page _____

The State of Alabama }
Baldwin County

By virtue of the within execution, I have, at _____ o'clock, _____ M., this
_____ day of _____ 193 _____, levied _____