

(7)
In the Superior Court
of Baltimore City

F. T. Gibson
et al

The Directors of the
Maryland Power
Company et al

Additional Pleas of
John F. Weyler Harder et al

In Clerk

File West
reas

L. L. Shaves
City Clerk

W. S. Bryan, Jr.

In behalf
of F. T. Gibson
et al

7d Feb 15 1909.

WILLIAM S. BRYAN, JR.

ATTORNEY AT LAW,

308-11 MARYLAND TELEPHONE BLDG.

BALTIMORE, MD.

G I B S O N , et. al.

v.

The Directors of the Mary-
land Penitentiary,
et. al.

IN THE
SUPERIOR COURT
OF
BALTIMORE CITY.

A N D John F. Weyler, ^{Warden} one of the defendants herein, by Isaac Lobe Straus, Attorney General, and William S. Bryan, Jr., his Attorneys, for a first additional plea - leave of Court to file the same having been first had and obtained - says: That the land described in the declaration in this case is covered by a portion of the building of the Maryland Penitentiary, a prison of the State of Maryland; and that this defendant is Warden of the said Penitentiary, with the duties prescribed by law and by the By-Laws of the said Penitentiary; a copy of which By-Laws is herewith filed, marked Exhibit Warden, and prayed to be taken as part of this plea; and this defendant further says that other than performing his duties as Warden of the said Maryland Penitentiary, this defendant has no title to or interest in or connection with the land described in the declaration.

A N D for a second additional plea - leave of Court to file the same having been first had and obtained - the said John F. Weyler says; that the land as described in the declaration is a part of the bed of Constitution Street, one of the public highways of Baltimore City; and that an ordinance was duly and regularly passed by the Mayor and City Council of Baltimore, providing for closing said

Constitution Street, but that the proceedings for closing said street has not been completed by the Commissioners for Opening Streets and filed in the office of the City Registrar up to the time of filing this plea.

A N D for a third additional plea to the declaration in said cause, says that he is an employe of the Directors of the Penitentiary, and holds his employment under and at the will of said Directors and subject to the rules and regulations adopted by said Directors.

A N D for a fourth additional plea he says that he is an employe of the Directors of the Maryland Penitentiary and holds his employment under and at the will of said Directors and subject to the rules and regulations adopted by them and that neither by virtue of his said employment nor of the rules and regulations adopted by said Directors is he in possession or charge of the property mentioned in the declaration in this cause or of the management thereof.

Isaac Lobe Straus
attorney General

William S. Bryant

*For defdt John F
Weyler Warden*