

303

IN THE
SUPERIOR COURT OF
BALTIMORE CITY.

264

1934

IRENE BARKLEY, by Olivia
Barkley, her next friend,

vs.

CHARLES F. NORRIS and
JOHN W. DULEY, individually
and trading as the Diamond
Cab Company.

94

DECLARATION

Mr. Clerk:

Please file, etc.

Thurgood Marshall
ATTORNEY FOR PLFF,

LAW OFFICES
THURGOOD MARSHALL
604 PHOENIX BLDG.

J. EDWARD RICHARDSON & Co., BALTIMORE, MD.

Filed 8 Mar 1934

IRENE BARKLEY, by
Olivia Barkley, her
next friend,
vs.
CHARLES F. NORRIS and
JOHN W. DULEY, trading as
the DIAMOND CAB CO.

◇
IN THE SUPERIOR COURT OF
◇
BALTIMORE CITY.
◇
◇

Irene Barkley, by Olivia Barkley, her next friend, sues Charles F. Norris and John W. Duley, individually and trading as the Diamond Cab Company.

For that, on or about the eighth day of February, 1934, the plaintiff while exercising due care and caution on her part, and while crossing Calhoun Street at Presbury and Cumberland Streets, public highways in the City of Baltimore, was run into by an automobile belonging to John W. Duley, being operated by Charles F. Norris as the Diamond Cab Company, and as a result thereof was knocked down; she sustained injuries to the head and legs as well as internal injuries; she was caused to suffer great and excruciating pain as well as mental anguish, and other and permanent injuries were suffered by her.

That she was caused to be run into by said automobile and sustained the injuries aforesaid by reason of the negligence, recklessness and want of care of the said Charles F. Norris, agent servant, and employee of the said John W. Duley while operating as the Diamond Cab Company, and while said Charles F. Norris was acting within the scope of his employment while driving and on the business of the defendant John W. Duley, in driving at a reckless rate of speed over a public highway, without keeping a proper lookout and without giving any signal whatever of the approach of said car, and that the same was not caused or occasioned by any want of care on the part of the plaintiff contributing thereto.

WHEREFORE, this suit is brought and the plaintiff claims
Two Thousand Five Hundred Dollars (\$2,500.00) damages.

Thurgood Marshall
Attorney for plaintiff

TO THE DEFENDANTS, Charles F. Norris and John W. Duley,
TAKE NOTICE:- That on a day of your appearance to this action in
the Superior Court of Baltimore City, you will be required to
plead to said declaration within the time allowed by law,
otherwise a judgment by default will be entered against you.

Thurgood Marshall
Attorney for Plaintiff.

IRENE BARKLEY, by
Olivia Barkley, her next
friend,

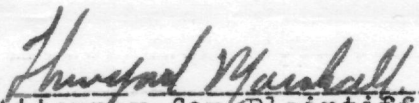
vs.

CHARLES F. NORRIS and
JOHN W. DULEY, individually,
and trading as the Diamond
Cab Co.

IN THE SUPERIOR COURT OF

BALTIMORE CITY

Irene Barkley, by Olivia Barkley, her next friend,
elects and prays to have the above entitled case tried by a
jury.


Attorney for Plaintiff.

26/54

IN THE
SUPERIOR COURT
OF
BALTIMORE CITY

IRENE BRAKLEY,
Olivia Barkley,
her next

IRENE BRAKLEY, by
Olivia Barkley, her
next friend,

vs
vs

CHARLES F. NORRIS and
JOHN W. DULEY,
individually, and
trading as the Diamond
Cab Co.

CHAS. F. NORRIS
JOHN W. DULEY
DIA. CAB CO.
293
19

ORDER OF SATISFACTION

Mr. Clerk:

Please file etc.

Thurgood Marshall

Attorney for Plaintiff

Thurgood Marshall
Attorney at Law
4 E. Redwood Street
Baltimore, Maryland

fd 19 June 1934

IRENE BARKLEY, by
Olivia Barkley, her next
friend.

vs.

CHARLES F. NORRIS and
JOHN W DULEY, individually,
and trading as the Diamond
Cab Co.

ORDER OF SATISFACTION

MR. CLERK:

IN THE
SUPERIOR COURT
OF
BALTIMORE CITY

Please file etc.

Baltimore, Maryland
4 E. Redwood Street
Attorney at Law
Thurston Marshall

Attorney for Plaintiff

BALTIMORE CITY
OF
SUPERIOR COURT
IN THE

Mr. Clerk:

Enter the above entitled case, "agreed settled and
satisfied," with costs to be paid by defendants.

Thurston Marshall

Attorney for Plaintiff

Charles F. Norris

Attorney for Defendant

11/10/1934

353
mch IN THE
SUPERIOR COURT OF BALTO. CITY

264
1934

IRENE BARKLEY, by
Olivia Barkley, her
next friend

VS

CHARLES F. NORRIS and
JOHN W. DULEY, trading as
the DIAMOND CAB CO.

Plea to Declaration

Mr. Clerk:

Please file etc.

Harold B. Karp
Atty. for Defendants

HAROLD B. KARP

ATTORNEY AT LAW

CHAMBER OF COMMERCE BLDG.

BALTIMORE, MD.

FILED

APR 3 1934
THE BALTO. STATY. CO.

IRENE BARKLEY, by
Olivia Barkley, her
next friend

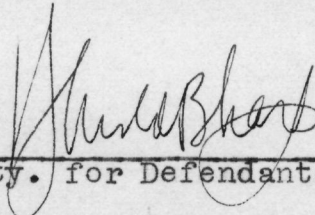
VS

CHARLES F. NORRIS and
JOHN W. DULEY, trading as
the DIAMOND CAB CO.

IN THE SUPERIOR COURT OF
BALTIMORE CITY.

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NOW comes CHARLES F. NORRIS and JOHN W. DULEY, trading
as the DIAMOND CAB COMPANY, by their attorney, Harold B. Karp,
and for plea to declaration state that they did not commit the
wrongs alleged.



Atty. for Defendants.

P 973

You have been summoned to appear in Court on the second Monday of March 1934. Personal attendance in Court on the day named is not required; but, unless within such number of days thereafter as the law limits, legal defense is made to the above mentioned suit, a judgment by default may be entered against you.

No. 353 264/1934 Su. Ct.

Irene Barkley &c

Diamond Copy Co

vs.

Charles F Norris &c

Writ of Summons

2-Copy^{ies} of Nar, and Notice to Plead Within to be served on Defendant.

T Marshall Esq.,

Attorney

Filed

MAR 12 1934

day of

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4-22



Summomed Ambo make Copy of her
and Notice to plead left with each
Defendant
Mr Williams
3-10-34
Geo J/92
Joseph C. Deagan
Shuff

(WRIT OF SUMMONS)

STATE OF MARYLAND

BALTIMORE CITY, to wit:

To THE SHERIFF OF BALTIMORE CITY, GREETING:

You are hereby commanded to summon Charles F Norris and
John W Duley Trading as the Diamond Cab Co.

of Baltimore City, to appear before the Superior Court of Baltimore City, to be held at the Court House in the same city, on the second Monday of March Inst ~~next~~ to answer an action at the suit of Irene Barkley by Olivia Barkley her next friend.

and have you then and there this writ.

Witness, the Honorable SAMUEL K. DENNIS, Chief Judge of the Supreme Bench of Baltimore City,
the 8th day of January 1934

Issued 8th day of March 1934

Stephen C. Little, Clerk.