

210 IN THE SUPERIOR COURT OF BALTIMORE City 726 1934

RUDOLPH HALEY, infant by)
ARCHIE HALEY, his father
and next friend. Plaintiff

VS
BOX No. - 158

WILLIAM RAINER
2625 Francis St. Defendant

DECLARATION AND ELECTION
OF JURY TRIAL

Mr. Clerk:

Please file etc.

Thurgood Marshall
Attorney for Plaintiff

THURGOOD MARSHALL
PHOENIX BUILDING
ATTORNEY AT LAW
4 E. REDWOOD STREET
BALTIMORE, MARYLAND
LUCAS BROS., INC., BALTIMORE

0 JUN 25 1934



RUDOLPH HALEY, infant by
ARCHIE HALEY, his father and
next friend

:

IN THE

That on a day of your appearance to this action in
the Superior Court of Baltimore City, you will be required to

SUPERIOR COURT

VS

plead to said declaration within the time allowed of law, otherwise

OF

WILLIAM RAINER

fault will be entered against you.

BALTIMORE CITY

Thurgood Marshall
Attorney for Plaintiff

Rudolph Haley, infant by Archie Haley, his father and next
friend sues William Rainer.

For that, on or about the fourteenth day of June, 1934 the
plaintiff while exercising due care and caution on his part, and
while crossing Druid Hill Avenue at Robert Street, public highways
of the City of Baltimore, was run into by an automobile being driven
by the defendant, William Rainer, and as a result thereof was knocked
down; he sustained serious and permanent injuries to his wrist and
arm as well as serious injuries to his head, face, and legs: he
was caused to suffer great and excruciating pain as well as mental
anguish, and other and permanent injuries were suffered by him.

That he was caused to be run into by said automobile and
sustained the injuries aforesaid by reason of the negligence, reck-
lessness and want of care of the said William Rainer in driving at
a reckless rate of speed over a public highway, without keeping a
proper lookout, without giving any signal whatever of the approach
of said car, in failing to give the right of way to a pedestrian and
that the same was not caused or occasioned by any want of care on
the part of the plaintiff contributing thereto.

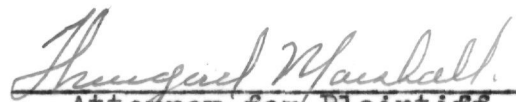
WHEREFORE this suit is brought and the plaintiff claims Five
Thousand Dollars (\$5,000) damages.

Thurgood Marshall

Attorney for Plaintiff

TO the DEFENDANT, WILLIAM RAINER

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.



Attorney for Plaintiff

RUDOLPH HALEY, infant by)
ARCHIE HALEY, his father and
next friend

:

VS

:

IN THE

SUPERIOR COURT

WILLIAM RAINER

:

OF

:

BALTIMORE CITY

Rudolph Haley, an infant by Archie Haley, his father and next friend, elects and prays to have the above entitled case tried by a jury.



Attorney for Plaintiff

726

IN THE
SUPERIOR COURT
OF
BALTIMORE CITY

RUDOLPH HALEY, INFANT BY
ARCHIE HALEY, HIS FATHER AND NEXT FRIEND
VS.
WILLIAM RAINER.

GENERAL ISSUE PLEA OF THE DEFENDANT

SERVICE ADMITTED, 7/9/34.

BY Thurgood Marshall
ATTORNEY FOR PLAINTIFF.

MR. CLERK; PLEASE FILE.

Lloyd G. McAllister
ATTORNEY FOR DEFENDANT

LLOYD G. MCALLISTER,
ATTORNEY AT LAW MUNSEY BUILDING,
BALTIMORE, MARYLAND.

Thurgood Marshall
604
115
JUL 9 1934

You have been summoned to appear in Court on the second Monday of July 1934. ⁴ 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.

P. 397

No. 210 726/1934 Su. Ct.

Rudolph Haley

vs.

William Rainer

2625 - Thomas A

Writ of Summons

Copy of Nar, and Notice to Plead Within to be served on Defendant.

T. Marshall

Attorney

Filed JUL 9 day of 1934



Summoned and a copy of Nar and
and notice to Plead left with the Sheriff's
office

6/25/34

6/25/34

Joseph. L. Hecygan
Shury

Dea 8095

(WRIT OF SUMMONS)

STATE OF MARYLAND

BALTIMORE CITY, to wit:

To THE SHERIFF OF BALTIMORE CITY, GREETING:

You are hereby commanded to summon.....

William Rainer

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 July next, to answer
an action at the suit of Rudolph Haley infant by Archie Haley

his father and 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 14th day of May 193⁴

Issued 25th day of June 193⁴

Stephen C. Livan, Clerk.