

630 Sept 31

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1062
1931

IN THE SUPERIOR COURT OF
BALTIMORE CITY

CALVIN E. COHEN

vs.

SAMUEL LIEBMAN

NARR, Notice to Plead Jury Trial

2872

MR. CLERK:

Please file and issue
and send copy of the Narr with
the writ to be served on the de-
fendant.

Allen H. Fisher
Att'y. in plaintiff

FISHER AND FISHER
ATTORNEYS AT LAW
704-705-706 UNION TRUST BUILDING
N.E. COR. CHARLES AND FAYETTE STS.
BALTIMORE, MD.

74 18 Sept 1931

5.85

27
75
135
189
20.25

CALVIN E. COHEN
vs.
SAMUEL LIEBMAN

* IN THE SUPERIOR COURT
* OF
* BALTIMORE CITY
*

Calvin E. Cohen, by Allan H. Fisher, his attorney, sues
Samuel Liebman:

For that on or about the 14th. day of June, 1931, Samuel Liebman drove an automobile on Ayrdale Avenue at or near its intersection with Forest Park Avenue, both streets, being public highways of the City of Baltimore, in such a negligent and reckless manner that said automobile driven by the said Samuel Liebman collided with and upset an automobile in which the plaintiff was riding. That as a result of said collision, the automobile in which the plaintiff was riding fell upon the plaintiff and severely injured him about the head, legs, arms and body. That the plaintiff's left hand was very badly injured as a result thereof, the plaintiff losing one of his fingers, and that the plaintiff's hand was torn and mutilated, and that the plaintiff has permanently lost the use of his said left hand. That as a result, the plaintiff was put to great expense for medical attention and hospital bills and nursing and suffered great physical pain and mental anguish, and for a long period of time the plaintiff was, and still is, prevented from practicing law, the plaintiff's profession, and doing any kind of work. That other great, serious and permanent injuries were by the plaintiff sustained. And the plaintiff further says that his inability to work also caused him great loss and damage. The plaintiff further says that said injuries are permanent in their effect and that he will always be disfigured as a result of said accident. And the plaintiff further says that said injuries were caused solely by the negligence and want of care on the part of the

2.

defendant and not by any negligence on the part of the plaintiff directly contributing to said accident.

Wherefore the plaintiff brings this suit and claims \$30,000.00 damages.

Allen H. Foster

Attorney for Plaintiff.

TO THE DEFENDANT, SAMUEL LIEBMAN, TAKE NOTICE: That on the date of your appearance to this action in the Superior Court of Baltimore City a rule will be laid against you requiring you to plead to the above declaration on or before the next Return Day after the one to which you have been summoned.

Allen H. Foster

Attorney for Plaintiff.

CALVIN E. COHEN

vs.

SAMUEL LIEBMAN

*

IN THE SUPERIOR COURT

*

OF

*

BALTIMORE CITY

*

And the plaintiff elects to have this case tried before
a Jury.

Allen H. Fish
Attorney for Plaintiff.

CALVIN E. COHEN

V.

SAMUEL LEIBMAN

:

:

:

:

IN THE

SUPERIOR COURT

OF

BALTIMORE CITY

Samuel Leibman, Defendant, by William D. Macmillan, his
Attorney, for plea to the declaration filed against him herein says:

That he did not commit the wrongs alleged.

William D. Macmillan
Attorney for Defendant.

88
Oct

1062

IN THE
SUPERIOR COURT
OF
BALTIMORE CITY

CALVIN E. COHEN

vs.

SAMUEL LEIBMAN

General Issue Plea.

Mr. Clerk:

Please file.

William D. Macmillan
Attorney for Defendant.

SEMMES, BOWEN AND SEMMES
COUNSELORS AT LAW

BALTIMORE, MD.

U. S. A.

filed 8th Oct 1931.

Deft's Atty

Wm Young & Brothers
Part 2 *Her Bregel Ey*

JANUARY TERM, 1932

THIRD PANEL

Superior Court of Baltimore City

Colvin E Cohen

Samuel Liebman vs.

Jury Sworn *3 Mar*, 1932

C. J. Kaufmann, Foreman

(Judge At Large) (For Service—February 23rd, 1932)

- 2 EARL B. HAINES, Tinner, 4022 N. Rogers Avenue.
5211 Reisterstown Road.
- 3 CHARLES A. ZAMRZLA, Lumber, 132 N. Luzerne Ave.
A. Hannemann & Company, 2501 E. Monument
Street.
- ~~GEORGE J. SCHAEFER, Optometrist, 805 E. 33rd Street.
133 S. Broadway.~~
- 4 ARTHUR C. KAMMER, President, 3123 Kenyon Avenue.
Holmes Electric Co., 420 N. Gay Street.
- CHARLES R. ZIEMANN, Stone-mason, 5601 Liberty
Heights Avenue.
- 5 WILLIAM H. KAUFERLEIN, Produce Commission Mer-
chant, 4310 Raspe Avenue.
Stall 87—249-251 Broadway Market.
- 6 HERMAN R. HENSCHEN, Bookkeeper, 1614 E. 32nd St.
J. H. Henschen, 1022 S. Sharp Street.
- JOSEPH GORE, Tile Setter, 1504 Moreland Avenue.
J. B. Dunn, 853 N. Howard Street.
- ALFRED H. MABEN, Clerk, 2244 Brookfield Avenue.
- GEORGE S. GREENER, Upholsterer, 2917 McElderry St.
Eastern Upholstery Co., 2108 E. Monument St.
- J. FRED BREGEL, Manager, 2833 Montebello Terrace.
C. D. Kenny Company, 528 N. Gay Street.
- 7 CHARLES P. MAHAFFEY, Clerk, 14 E. Lanvale Street.
- 8 WILLIAM J. H. CULP, Salesman, 208 Cedarcroft Road.
James R. Armiger Co., 310 N. Charles Street.
- ~~AUGUST F. MACK, Contractor, 220 N. Castle Street.
Self, 220 N. Castle Street.~~
- ✓ EDWARD G. TURNER, Contractor and Builder, 3406
Bateman Avenue.
2133 Maryland Avenue.
- ✓ EDWIN G. YEARLEY, Civil Engineer and Landscape
Architect, 1637 E. 32nd Street.
Roland Park Co., 4810 Roland Avenue.
- 9 CLAYTON E. McCLURE, Salesman, 3349 Belair Road.
K. Katz & Sons, 211 E. Baltimore Street.
- 10 JOHN GEO. ACHZIGER, Extract Manufacturer, 820 N.
Kenwood Avenue.
W. A. Walter & Company, 428 W. Conway St.
- ~~JOHN W. DELANEY, Contractor, 2208 Barclay Street.
Self, 2208 Barclay Street.~~
- 11 GEORGE ZUSCHLAG, Clerk, 1612 Chilton Street.
FELIX T. PHYSIOC, Designer, 604 Lyndhurst Street.
Jett Bros. Co., 23 W. Fayette Street.
- 12 EDMUND I. UPTON, Foreman, 503 Washburn Avenue.
Retired.
- ✓ CLEMENS G. KAUFMANN, Secretary, 12 E. 24th Street.
Tyler Can Company, 1409 Eastern Avenue.
- ~~CHARLES W. DANNENFELSER, Produce Dealer, 1939
E. North Avenue.
Self, 127 Belair Market.~~
- ~~WILLIAM O. MILLS, Manager, 1512 Mt. Royal Avenue.
Hurlbutt & Hurlbutt, Inc., 403 N. Charles St.~~

COURT'S INSTRUCTION

The word negligence, as used in the several prayers, means the lack of ordinary care. By ordinary care is understood that degree of caution, attention, activity and skill, which are habitually employed by, or may reasonably be expected from, persons in the situation of the respective parties, under all the circumstances surrounding them at the time.

*Granted
jmc*

DEFENDANT'S ^{1st} PRAYER

The defendant prays the court to instruct the jury that under the law all vehicles shall have the right of way over other vehicles approaching at intersecting public roads from the left, and shall give right of way to those approaching from the right. But the jury are further instructed that the "right of way" so defined does not confer an absolute right upon its possessor to proceed regardless of traffic approaching from the left, and reasonable care appropriate to all the surrounding facts and circumstances shown by the evidence must be exercised by all drivers whether having the "right of way" or not.

*Granted as modified
gm*

DEFENDANT'S *Second* PRAYER

The Court instructs the Jury that if they shall believe from the evidence, that the accident was directly caused by the concurrent negligence of the plaintiff and the defendant, and that it would have been avoided by due and proper care on the part of either said plaintiff or said defendant, then their verdict must be for the defendant without regard to whose negligence was greater.

*Granted in Connection with
Pl's 6th + 7th Prayers
jm*

DEFENDANT'S

Prayer

PRAYER

The Court instructs the Jury that ordinary care and caution is such a degree of care and caution as men of ordinary prudence under similar circumstances usually employ; and in determining whether the plaintiff used ordinary care and caution, they shall consider all the facts and circumstances of the case as given in evidence and with such facts the Jury may consider the ordinary conduct and motive of men for avoiding all undue exposure to risk and danger in determiningⁱⁿ the question whether or not the plaintiff exercised reasonable care and caution to prevent the accident.

*Granted
jmr*

DEFENDANT'S

Fourth

PRAYER

The Court instructs the Jury that the mere happening of the accident raised no presumption of negligence on the part of the defendant operating the automobile referred to in the evidence, but the burden of proof is upon the plaintiff to establish by a fair preponderance of affirmative evidence that negligence on the part of the defendant caused said accident, and if the minds of the Jury are left by the evidence in a state of even balance or equipoise as to the existence of such negligence, then the verdict must be for the defendant.

*Gautd
jr*

Cohen vs. Liebman

Plaintiff's First Prayer

The plaintiff prays the Court to instruct the Jury that if they shall find from the evidence that the plaintiff was driving his automobile easterly along Forest Park Avenue at its intersection with Ayrdale Avenue, two of the public highways of Baltimore City; and if the Jury shall further find that the plaintiff in his car was actually crossing the street intersection at a time when the defendant's automobile, driven by the defendant, approaching from the right, was at such a distance from the intersection that its movement could not reasonably be supposed to create any danger that the automobile of the plaintiff and the automobile of the defendant would collide, then the plaintiff, driving his car, was not required to wait until the car driven by the defendant had passed; and if the Jury further find that after the plaintiff's car had gotten into the intersection and was actually crossing the same, the defendant increased the speed of his car and drove his car at such increased speed (if the jury so find) over such intervening distance and against the plaintiff's automobile; (if the jury so find); and if the Jury further find that the accident complained of was caused by the increased rate of speed, if they so find, at which the defendant drove his automobile over such intervening distance, then the plaintiff is entitled to recover, unless the Jury shall find that the plaintiff, by his own negligence, contributed to the injuries for which he sues.

*Granted
gmw*

Cohen vs. Liebman

Plaintiff's *2nd* Prayer

The plaintiff prays the Court to instruct the Jury that if they shall find for the plaintiff, then in estimating the damages, the Jury are to consider the health and condition of the plaintiff before the injuries complained of as compared with his present subsequent condition in consequence of said injuries; and whether and to what extent, if at all, the same are in their nature permanent, and to what extent they have prevented the plaintiff from engaging in those business pursuits which, in the absence of such injuries, the plaintiff would have been able to engage in, and to what extent, if any, they will in the future prevent the plaintiff from engaging in those business pursuits which, in the absence of such injuries, the plaintiff would have been able to engage in; and also the mental and physical suffering, if any, to which he has been subjected by reason of said injuries, and also such amounts for medicine and medical and hospital services which the plaintiff may have expended or incurred by reason of said injuries, and also such amount as the jury may find represented the reasonable cost to repair the damage done to the automobile of the plaintiff caused by said accident; and the Jury may allow him such damages in consequence of said injuries as will be a fair and just compensation for the injuries which he has sustained.

*Granted
gm*

PLAINTIFF'S

Mind

PRAYER

The Plaintiff prays the Court to instruct the jury that if they shall find from the evidence that the plaintiff was injured in the collision between the automobile which he was driving and the care of the Defendant and if they further find that such injury might have been avoided by the exercise of ordinary care and prudence on the part of the Defendant, then their verdict must be in favor of the Plaintiff unless they find that the Plaintiff by his own negligence directly contributed to the accident complained of.

*Granted
jmw*

PLAINTIFF'S

Smith

PRAYER

The Plaintiff prays the Court to instruct the jury that even though they may find that the Plaintiff was guilty of negligence in crossing Ayrdale Avenue while the Defendant's car was approaching from the Plaintiff's right, nevertheless if they further find from the evidence that the Defendant by the exercise of reasonable care and caution on his part after he became aware of the peril in which the Plaintiff had by his negligence, if the jury so find, placed himself, could have avoided the consequences of the Plaintiff's said negligence and prevented the injuries complained of, if they so find, then the verdict of the jury shall be in favor of the Plaintiff.

*Granted in connection
with Def's 2nd Prayer*

gm

PLAINTIFF'S *seventh*

PRAYER

The Plaintiff prays the Court to instruct the jury that even though they may find that the Plaintiff was guilty of negligence in crossing Ayrdale Avenue while the Defendant's car was approaching from the Plaintiff's right, nevertheless if they further find that the Defendant could by the exercise of reasonable care have discovered the position of peril of the Plaintiff while the Plaintiff was crossing Ayrdale Avenue and if they further find that the said Defendant after he saw or by the use of ordinary care might have seen the Plaintiff in a position of peril, if they so find, could by the exercise of reasonable care have avoided injury to the Plaintiff or his property, if the jury so find, then the verdict shall be in favor of the Plaintiff.

*Granted in connection
with Def's 2nd Prayer
gm*

Cohen

vs

Leibman

Jury so find, then the verdict shall be in favor of the Plaintiff.

able care have avoided injury to the Plaintiff or his property, if the

position of peril, if they so find, could by the exercise of reason-

be saw or by the use of ordinary care might have seen the Plaintiff in

Ayrdale Avenue and if they further find that the said Defendant after

the position of peril of the Plaintiff while the Plaintiff was crossing

the Defendant could by the exercise of reasonable care have discovered

from the Plaintiff's right, nevertheless if they further find that

in crossing Ayrdale Avenue the Defendant's car was approaching

even though they may find that the Plaintiff was guilty of negligence

Granted Prayers

The Plaintiff prays the Court to instruct the Jury that

Filed 4 March 1932

The defendant specially excepts to the granting of the 'Court's Instruction' because,

- (a) the definition of ordinary care set forth in said prayer or instruction is misleading;
- (b) the definition of ordinary care set forth in said prayer is misleading when taken in connection with the case required of the plaintiff in the defendant's first prayer as modified by the Court;
- (c) the definition of ordinary care set forth in said prayer is misleading when taken in connection with the prayers submitted by the plaintiff;
- (d) the definition of negligence is misleading when taken in conjunction with the prayers of both the plaintiff and defendant and granted by the Court;
- (e) the instruction is misleading in that it attempts to define negligence generally, and does not qualify the definition with contributory negligence or with the theory of the 'last clear chance' set up in the prayers.

McBryde
[Signature]
for defendant.

Overruled
gm

The defendant specially excepts to the Court modifying the defendant's first prayer, because:

- (a) the prayer before being modified correctly stated the statute law in such cases;
- (b) the prayer as modified sets up the same degree of care at intersecting public roads for the driver having the right of way and the driver not having the right of way;
- (c) the prayer as modified is misleading as it sets up a rule of law at intersecting public road different from the statute law.

W. C. Brown
W. C. Brown
for the defendant.

Overruled
gm

The defendant specially excepts to the granting of the plaintiff's first prayer, because:

- (a) it assumes that the defendant's automobile did create a danger to the plaintiff's automobile;
- (b) it allows the jury to speculate as to what would create a supposed danger to the plaintiff's automobile;
- (c) it assumes that the defendant drove his automobile at an increased rate of speed after the plaintiff had entered the intersection;
- (d) it assumes the plaintiff had entered and was crossing the intersection before the defendant approaching the intersection as defined in the statute;
- (e) it assumes the plaintiff was of right in the intersection when an intervening distance separated the plaintiff from the defendant, who then increased his speed.

W. C. Brown
W. C. Brown
for the defendant.

Overruled
gm

The defendant specially excepts to the granting of the plaintiff's second prayer, because

(a) there is no evidence that the plaintiff is or has been engaged in a business or business pursuits (as distinguished from practicing law or teaching school), or what business or business pursuits the plaintiff can or contemplates engaging in;

(b) there is no evidence legally sufficient to establish the condition of the health of the plaintiff before the accident.

W. B. Boyd
W. B. Boyd
for the defendant.

Overruled
JW

The defendant specially excepts to the granting of the plaintiff's sixth prayer, because:

- (a) it assumes the ~~defendant~~ became aware of the plaintiff's peril;
- (b) it assumes the plaintiff was in a place of peril;
- (c) there is no legally sufficient evidence that the defendant could have avoided the accident after the plaintiff had placed himself in a place of peril;
- (d) the first prayer and this prayer are inconsistent, in that the plaintiff could not be without negligence and at the same time have contributed by his negligence to the accident.

W. C. Brant
W. C. Brant
for the defendant.

Overruled
JW

The defendant specially excepts to the granting of the plaintiff's seventh prayer, because:

- (a) it assumes the defendant was or could by the reason of ordinary care become aware of the plaintiff's peril;
- (b) it assumes the plaintiff was in a place of peril;
- (c) there is no legally sufficient evidence to establish that the defendant could have avoided the accident after the plaintiff was in a place of peril;
- (d) that the first prayer of the plaintiff is inconsistent with this prayer in that the plaintiff could not have been at the same time free of negligence and at the same time in a place of peril through the negligence of the plaintiff.

W. C. Brant
W. C. Brant
for the defendant.

Overruled
JW

PLAINTIFF'S

Fifth

PRAYER

The Plaintiff prays the Court to instruct the jury that the Plaintiff is entitled to recover provided the Defendant could have avoided the accident by exercise of ordinary care after he saw, or by the use of ordinary care might have seen, that the Plaintiff was crossing Ayrdale Avenue and in danger of being struck by the Defendant's automobile, unless they further find that the Plaintiff by the exercise of ordinary care and caution could have extricated himself from the perilous position in which he was situated and thereby avoided the injuries.

Withdrawn

PLAINTIFF'S

fourth

PRAYER

The Plaintiff prays the Court to instruct the jury that if they find from the evidence in this case that the automobile which the plaintiff was driving was proceeding easterly along Forrest Park Avenue at or near its intersection with Ayrdale Avenue, two public thoroughfares, of Baltimore, and if they further find that the Defendant in this case by the exercise of reasonable diligence could have discovered the peril of the Plaintiff in time to stop his said automobile before its collision with the automobile which the Plaintiff was driving; and if they further find that the defendant failed ~~in his duty~~ to stop his said automobile in time to avoid said accident, if the jury so find, and if the jury shall further find that such failure on the part of the Defendant, if they shall so find, was the proximate cause of said accident and resulting injury to the Plaintiff, then the verdict of the jury must be in favor of the Plaintiff unless they find that the Plaintiff by his own negligence contributed to the accident complained of.

withdrawn

Copy

For record

of Baltimore

For + March 1925

dent and resulting injury to the Plaintiff, then the verdict of the jury

Defendant, if they shall so find, was the proximate cause of said acci-

and if the jury shall further find that such failure on the part of the

his said automobile in time to avoid said accident, if the jury so find,

and if they further find that the defendant failed ~~in his duty~~ to stop

before its collision with the automobile which the Plaintiff was driving

covered the peril of the Plaintiff in time to stop his said automobile

in this case by the exercise of reasonable diligence could have dis-

thoroughly, of Baltimore, and if they further find that the Defendant

Avenue at or near its intersection with Ayrdale Avenue, two public

the plaintiff was driving was proceeding easterly along Forrest Park

Cohen

125

Kelbman

Refused Progeny

Tried 4 March 1932

CALVIN E. COHEN

:

IN THE SUPERIOR COURT

VS.

:

OF

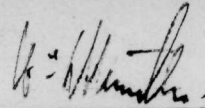
SAMUEL LIEBMAN

:

BALTIMORE CITY

Mr. Clerk:

You are hereby directed to strike out the appearance of William
D. Macmillan as attorney for the Defendant in the above entitled case.



Attorney for Defendant.

#630

203/16

1062
1931

IN THE SUPERIOR COURT OF
BALTIMORE CITY

New amended

CALVIN E. COHEN

VS.

SAMUEL LIEBMAN

ORDER OF STRIKING OUT APPEARANCE.

Mr. Clerk:

Please file.

W. H. ...

Attorney for Defendant.

Service of copy admitted this
day of February, 1932.

Allan H. Fisher

Attorney for Plaintiff.

SEMMES, BOWEN AND SEMMES
COUNSELORS AT LAW

BALTIMORE, MD.

U. S. A.

FILED FEB 18 1932

Superior Court of Baltimore City

Calvin E. Cohen

Samuel Liebman vs.

Jury Sworn 3 Mar, 1932

C. G. Kaufman, Foreman

(Judge At Large) (For Service—February 23rd, 1932)

- 2 EARL B. HAINES, Tinner, 4022 N. Rogers Avenue. 5211 Reisterstown Road.
- 3 CHARLES A. ZAMRZLA, Lumber, 132 N. Luzerne Ave. A. Hannemann & Company, 2501 E. Monument Street.
- GEORGE J. SCHAEFFER, Optometrist, 805 E. 33rd Street. 133 S. Broadway.
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- JOSEPH GORE, Tile Setter, 1504 Moreland Avenue. J. B. Dunn, 853 N. Howard Street.
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1870
JAMES W. HARRIS, JR. vs. J. S. HARRIS
JAMES W. HARRIS, JR. vs. J. S. HARRIS

STEPHEN S. KULLAVAINI vs. JAMES W. HARRIS, JR.

EDWARD T. HALL vs. JAMES W. HARRIS, JR.

LEWIS S. HARRIS vs. JAMES W. HARRIS, JR.

GEORGE S. HARRIS vs. JAMES W. HARRIS, JR.

JOHN A. HARRIS vs. JAMES W. HARRIS, JR.

JOHN S. HARRIS vs. JAMES W. HARRIS, JR.

LEWIS S. HARRIS vs. JAMES W. HARRIS, JR.

EDWARD T. HARRIS vs. JAMES W. HARRIS, JR.

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EDWARD T. HARRIS vs. JAMES W. HARRIS, JR.

Handwritten signature

Superior Court of Baltimore City

JAMES W. HARRIS, JR. vs. JAMES W. HARRIS, JR.

Page 2

(WRIT OF SUMMONS)

STATE OF MARYLAND

BALTIMORE CITY, to wit:

To THE SHERIFF OF BALTIMORE CITY, GREETING:

You are hereby commanded to summon _____

Samuel Liebman

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 October next, to answer an action at the suit of Calvin E. Cohen

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 Sept 1931

Issued 18th day of Sept 1931

Stephen C. Little, Clerk.

P-20

You have been summoned to appear in Court on the second Monday of Oct 1931 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. 88 1062/1931 Su. Ct.

Calvin E. Cohen

vs.

Samuel Liebman

Arlington Hotel
5200 Rochester Rd

3921 Harper St

Writ of Summons

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

A. H. Fisher

Attorney

OCT 12 1931

Filed

day of

193

18

Summoned and a Copy of Writ and Notice to Plead left with the defendant.
Josephine Burrows
7/13/31

File \$95-

RECEIVED AT THE SHREVEPORT DISTRICT COURT
NOV 1 1931
Josephine Burrows
Shreveport

