

84

IN THE <sup>1065</sup> 1923

1298 X

356

SUPERIOR COURT OF BALTIMORE CITY.

William E. Shaw,

vs

The United Railways and  
Electric Company and  
Edward Jett.  
*1113 North Park St.*

DECLARATION.

Mr. Clerk:

Please file, etc.

*James Loh & Sons*  
*W. P. ...*  
Attys. for Plaintiff.

BOX No. 2252

*Filed 16<sup>th</sup> Nov 1923*

*150*  
*600*  

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*1.20*

*10 Dec 23*  
*P. H. ...*

William E. Shaw,

vs

The United Railways and  
Electric Company and  
Edward Jett.

In the  
Superior Court of Baltimore City.

William E. Shaw, by Isaac Lobe Straus and William Pinkney Whyte, Jr., his attorneys, sues the United Railways and Electric Company of Baltimore City and Edward Jett:

FOR THAT the defendant, the United Railways and Electric Company of Baltimore City, is a body corporate engaged in the transportation of persons for hire in the City of Baltimore and elsewhere, and in pursuance of its said business operates its electric cars over and upon the streets and highways of said City of Baltimore, in charge of and operated by its servants and agents, and that the defendant, Edward Jett, is the owner and operator of an automobile; that on or about the 1st day of September 1923, the plaintiff was a passenger on one of the cars of the defendant, the United Railways and Electric Company, in charge of and operated by its servants and agents as aforesaid; that at the end or terminus of the car line running east on Baltimore Street and turning south on Patterson Park Avenue and immediately on the west of Patterson Park there are safety posts and chains provided for the safe ingress and egress of passengers using and desiring to use said electric cars; that the plaintiff desired to alight from said car at its terminus or stopping place on Patterson Park Avenue in the City of Baltimore aforesaid and said car was brought to a full stop and the doors of the same opened for the purpose of discharging passengers on said Patterson Park Avenue, but through the negligence and fault of the defendant Railway Company's said servant or agent in charge of said car the same was not brought to a stop at or in front of the said safety posts and chains, the point established

and usually and customarily used for the stopping of said cars and being a safe place for passengers including the plaintiff to alight, but was stopped before reaching the said safety posts and chains, which compelled the plaintiff to alight in a dangerous and unsafe place, and in so alighting, though using due care and through no fault of his, was struck, knocked down and severely injured by the automobile belonging to and operated by the defendant, Edward Jett, being then and there negligently, wrongfully and unlawfully driven and operated by the said Edward Jett and without regard to the safety and rights of the plaintiff. That said accident was the result of the joint negligence, misconduct and malfeasance of both defendants in the premises. That as the result of being so run into and knocked down the plaintiff sustained severe and permanent bodily injuries especially to his right arm and has been and will be put to great expense for medicines and medical services, has been, is and will be confined to his home for sometime to come and thereby prevented from pursuing his usual occupation as a machinist, and has been otherwise injured and damaged.

And the plaintiff claims \$5,000.00.

*Leah Johnson*  

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*W. P. White, Jr.*  
Attorneys for Plaintiff.

To the Defendants:

The United Railways and Electric Company:

Edward Jett:

TAKE NOTICE:

That on the day of your appearance to this suit in the Superior Court of Baltimore City a rule will be laid requiring you to plead to said declaration within thirty days thereafter or judgment by default will be entered against you.

*Jean Loh Strauss*

*W. C. McKinney White Jr.*

Attorneys for Plaintiff.

William E. Shaw,

vs

The United Railways and  
Electric Company and  
Edward Jett.

In the

Superior Court of Baltimore City.

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The Plaintiff elects and prays to have the above entitled  
case tried before a jury.

Charles L. Strauss

W. P. McKinley & W. H. D. J.  
Attorneys for Plaintiff.

1065

84

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In the  
Superior Court of  
Baltimore City.

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William E. Shaw

vs.

THE UNITED RAILWAYS AND  
ELECTRIC COMPANY OF  
BALTIMORE, and  
Edward Jett.

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P L E A .

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Mr. Clerk:

Please file.

*J. Penhroke Thomas*

Attorney for Defendant.

The United Railways and  
Electric Company of  
Baltimore.

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FILED DEC 8 1923

William E. Shaw

vs.

THE UNITED RAILWAYS AND  
ELECTRIC COMPANY OF  
BALTIMORE,  
a corporation, and  
Edward Jett, 1113 N. Port St.

In the

Superior Court of  
Baltimore City.

P L E A .

The Defendant, The United Railways and Electric Company  
of Baltimore, by J. Pembroke Thom, its attorney, for Plea, says:

That it did not commit the wrongs alleged.

J. Pembroke Thom

Attorney for Defendant.

The United Railways and  
Electric Company of  
Baltimore.

No. 84 1065/1923 Su. Ct.

William E. Shaw

vs.

THE UNITED RAILWAYS  
AND ELECTRIC COMPANY OF  
BALTIMORE.  
& Edward Jett *1113 A Part of*

**WRIT OF SUMMONS**  
and copy

2 Copies ~~ies~~ Nar. and notice to plead within  
to be served on Defendant.

I.L.Straus, W.P.Whyte

Attorney.

Filed *DEC 10 1923* day of 1923

*2-6*



WRIT OF SUMMONS.

# STATE OF MARYLAND

BALTIMORE CITY, to wit:

TO THE SHERIFF OF BALTIMORE CITY, GREETING:

You are hereby commanded to summon

*John J. Clark 12/1/23 (2)*  
**The United Railways and Electric Company  
of Baltimore,**

*SP #6 12/5/23*  
**And Edward Jett**

A BODY CORPORATE.

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 **December** next, to answer an action  
at the suit of **William E. Shaw** *SP 12/5/23*

and have you then and there this writ.

Witness, the Honorable **MORRIS A. SOPER**, Chief Judge of the Supreme Bench of Baltimore City,  
the **10th** day of **Sept**, 19**23**

Issued **16th** day of **Nov** 19**23**

*Stephen C. Little*

Clerk.

1227 21

# SHERIFF'S RETURN

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SUMMONED THE UNITED RAILWAYS AND ELECTRIC COMPANY OF BALTIMORE, A CORPORATION, BY SERVICE ON JOHN T. STAUB, TREASURER, AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS LEFT WITH SAID TREASURER.

Also summoned Edward Jett and a Copy of Nar and notice to Plead left with the deferedant

Fee \$1.80

(Yaffe) 12/1/23

(McKinley) 12/5/23

Thomas J. McQuilty  
SHERIFF

IN THE SUPERIOR COURT OF

BALTIMORE CITY <sup>1068</sup> 69-23

WILLIAM E. SHAW

VS.

THE UNITED RAILWAYS &  
ELECTRIC COMPANY and  
EDWARD JETT.

DEFENDANT'S ANSWER

Mr. Clerk:-

Please file.

*J. Steward Davis*

*George W. Evans*

ATTORNEYS FOR DEFENDANT.

J STEWARD DAVIS  
ATTORNEY AT LAW  
215 SAINT PAUL PLACE  
BALTIMORE, MD.

*Filed 20 Dec 1923*

WILLIAM E. SHAW

:

IN THE SUPERIOR COURT

VS.

:

OF

THE UNITED RAILWAYS and  
ELECTRIC COMPANY and  
EDWARD JETT.

:

BALTIMORE CITY.

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Edward Jett, defendant, by his attorneys, J. Steward Davis  
and George W. Evans, says:

That he did not commit the wrong alleged.

*J. Steward Davis*

*George W. Evans*

ATTORNEYS FOR DEFENDANT.

# 1298 Jan 3,

IN THE

SUPERIOR COURT

WILLIAM E. SHAW

vs.

**The United Railways & Electric Co.**

OF BALTIMORE.

AND

Edward Jett

**AGREED AND SETTLED**

MR CLERK --Please File

*Isaac Lohr Frank,*  
*Attorney for Plaintiff*

FILED FEB 18 1925

WILLIAM E. SHAW

IN THE

SUPERIOR COURT

vs.

The United Railways & Electric Co.

OF BALTIMORE  
AND  
EDWARD JETT

Mr. Clerk :

Please enter the above entitled case agreed and settled, Defendant, The United Railways  
to pay costs.

Witnesses :

Margaret Meiser

William E. Shaw  
Plaintiff.

Lucas Lohr Strass  
W. P. McKinley Whistler  
Attorney for Plaintiff.

Edward a Jett  
Attorney for Defendant.  
Edward Jett

J. Pembroke Thom.  
Attorney for defendant, The United  
Railways and Electric Company of  
Baltimore.