

No. 276

222

52

In the
Baltimore City
Court

W. W. Colbert
Plaintiff

-vs-

James A. Bryson
Individually and

the
Baltimore Conference
of the African Methodist
Episcopal Church,
a body corporate,
Defendant

My Clerk:
Please file etc

J. Steward Davis
and
U. Grant Tyler
attys for Plaintiff

Original

Filed 9th Feb. 1922

DAVIS & E'
ATTORNEYS AT LAW
BANNEKER BUILDING
14 E PLEASANT STREET
BALTIMORE, MD

FIRST COUNT.

W.W. COLBERT; PLAINTIFF.

VS.

IN THE

JAMES A. BRISCOE, INDIVIDUALLY AND THE

BALTIMORE CONFERENCE OF THE

AFRICAN METHODIST EPISCOPAL CHURCH.

(A BODY CORPORATE, DEFENDANTS)

BALTIMORE CITY COURT

OF

BALTIMORE CITY.

.....

FIRST COUNT.

The Plaintiff by his attorneys, J. Steward Davis and U. Grant Tyler, sues, the defendants, James A. Briscoe individually and the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, said Corporation, defendants, FOR THAT: The defendants in the minutes of the One hundred and fourth annual session of the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, while in session at Lanvale Street and Druid Hill avenue, in the city of Baltimore and the State of Maryland, from 20th. of April ¹⁹²¹ to 24th. ^{April} 1921. the right Reverend J. Albert Johnson, Bishop, presiding, Rev. D. G. Hill, Presiding Elder, Rev. Frederick Douglas, Pastor, with Rev. J. A. Young, Secretary ^{individually and} by its agents and servants did publish, among other things, the false, scandalous, malicious, defamatory, libellious matter; TO WIT:-----

"THE BEE, MD. Rev. W. W. Colbert, Pastor". Rev. Colbert had two appointments this year, but the people at both churches rejected him. He is not true to himself nor to his friends, "The conference should rid itself of such men". Yet the defendants, well knowing the premises and contriving wickedly and maliciously intending to injure the plaintiff in his good name, fame and credit and to bring him into public scandal, infamy and disgrace, with and among his neighbors and other good and worthy citizens of the city of Baltimore and else-where ^{individually and} by its agents and servants published the minutes of the One hundred and fourth session of the Baltimore Conference of the African Methodist Episcopal

-2-

Church, a body corporate ^{individually and} by its agents and servants caused to be circulated and read heretofore TO WIT:-----

(From and after the 20th. day of April, ¹⁹²¹ to 24th. day of April, 1921, said days being the sessions of the aforesaid conference in the city of Baltimore and State of Maryland, at which sessions the said minutes was made formulated and published, in the city of Baltimore, State of Maryland, at Lanvale street and Druid Hill ave. in the city of Baltimore and the State of Maryland by said James A. Briscoe and the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, as aforesaid ^{individually and} falsely, wickedly and maliciously ^{by} its agents and servants did compose and publish and caused to be composed and published in their minutes, called the minutes of the one hundred and fourth annual Session of the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, and in particular of and concerning the plaintiff and of and concerning the said office of a minister of the gospel of the African Methodist Episcopal Church, herein after called (The A.M.E. Church) a body corporate, and in particular of and concerning the aforesaid office of the plaintiff ^{individually and} by its agents and servants did publish a certain false and scandalous, malicious and defamatory libel, which was understood by the publishers of said minutes of the one hundred and fourth annual session of the Baltimore Conference of the (A.M.E. Church) and ^{by} James A. Briscoe individually and which was understood by the readers of said minutes, in the sense hereinafter set forth in the innuendo, and intended by the defendants to be so understood, containing among other things, the false, scandalous, malicious, defamatory, libelious matter and caused the same to be widely circulated and read in the city of Baltimore other portions of Maryland, Africa, South America: As Follows: That is to say:

"THE BEE, Md. Rev. W.W. Colbert, Pastor. Rev. Colbert has had two appointments this year but the people at both churches, rejected him. He is not true to himself nor to his friends. The Conference should rid itself of such men" "Thereby learning

that Rev. W.W.Colbert, pastor at Tee Bee, Md. under the supervision of the Baltimore Conference (with James A. Briscoe) presiding Elder) an officer of the Baltimore Conference, is a knave or Scoundrelor Villian, meaning in particular the plaintiff was a moral leper, meaning he the plaintiff herein named had violated his obligation taken in ORDINATION, when entering the Baltimore Conference; To the great damage of the plaintiff, wherefore, he claims Five thousand dollars damages.

~~U. Grant Tyler~~

U. Grant Tyler

ATTORNEYS FOR PLAINTIFF.

N.B.

TAKE notice that on the day of your appearance to this action in the ~~Baltimore City Courts~~ a rule will be entered, requiring you to plead to the within declaration within fifteen days thereafter.

~~U. Grant Tyler~~

U. Grant Tyler

PLAINTIFF'S ATTORNEYS.

THE PLAINTIFF IN THE ABOVE ENTITLED CAUSE, PRAYS, A JURY TRIAL.

U. Grant Tyler

PLAINTIFF'S ATTORNEYS.

W.W COLBERT, PLAINTIFF

VS.

::

IN THE CITY COURT

THE BALTIMORE CONFERENCE OF ::

THE AFRICAN METHODIST ::

OF

EPISCOPAL CHURCH,
(A BODY CORPORATE, DEFEN-
DANT).

BALTIMORE CITY.

.....

SECOND COUNT

The Plaintiff, W.W.Colbert, by his attorneys, J. Steward Davis and U.Grant Tyler, sues the defendant, The Baltimore Conference of the African Methodist Episcopal Church, a body Corporate, defendant, FOR THAT:

The defendant, The Baltimore Conference of the African Methodist Episcopal Church, a body corporate, while in session at Lanvale Street and Druid Hill ave. in the city of Baltimore, State of Maryland, from 20th. day of April 1921 to 24th. day of April, 1921, the Right Reverend J.Albert Johnson, Bishop, presiding: Rev.D.G.Hill, Presiding Elder; Rev. Frederick Douglas, Pastor; with Rev.J.A.Young, Secretary, by its agents and servants did publish, among other things, the false, scandalous, malicious, defamatory, libelious matter; TO WIT:-----

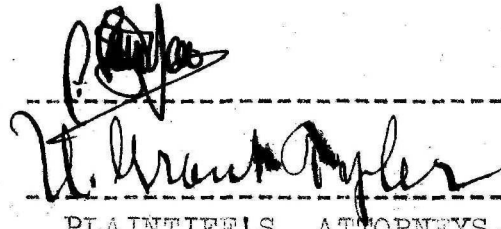
"THE BEE, MD. Rev. W.W. Colbert, Pastor. Rev.Colbert had two appointments this year, but the people at both churches rejected him. He is not true to himself nor to his friends. The Conference should rid itself of such men". Yet the defendant, well knowing the premises and contriving, wickedly and maliciously, intending to injure the plaintiff in his good name and fame and credit and to bring him, W.W.Colbert, plaintiff into public scandal, infamy and disgrace, with and among his neighbors and other good and worthy citizens of the city of Baltimore and elsewhere, ⁱⁿ the minutes of the one hundred and fourth session of the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, by its agents and servants ^{published with said minutes to} ~~and~~ be circulated and read heretofore, TO WIT:---

From and after the 20th. and 24th. days of April, 1921, some being the days of its compilation and formation by the said conference, its agents and servants, at Bethel' African Methodist Episcopal Church, at and from which time and place the aforesaid minutes was composed, formulated, compiled and was published (said place being in the city of Baltimore, State of Maryland) in the minutes of said Baltimore Conference of the African Methodist Episcopal Church, a body corporate, and ^{said} publication committee being agents of the said body corporate which referred in particular to the plaintiff in his office and character as a minister of the gospel, that the Presiding Elder, James A. Briscoe, in his capacity as such an officer of the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, upon whose presentation as such an officer of said corporation, which said conference passed upon W.W. COLBERT'S character, after which the conference refused to give the plaintiff an appointment and his brother ministers refuse and still refuse to permit the plaintiff to use their pulpits, wherefore they did wilfully, maliciously, defame the character of the said Rev. W.V. COLBERT, a minister of the gospel, yet the defendant, well knowing the premises and contriving and wickedly and maliciously intending to injure the plaintiff in his good name, fame and credit and to bring him into public scandal, infamy and disgrace, among his fellow ministers and with all his neighbors and other good and worthy citizens of Baltimore City and else where, where-ever the said minutes should be circulated and read and further to prevent the plaintiff from being received into any other evangelical church, with his attained orders and in particular including the plaintiff and concerning the plaintiff's conduct in office as a minister of the gospel, at Tee Bee, Md. in particular, and the other charge during the conference year, ending April 24th. 1921, of the conference by its agents and servants, ^{published and} caused a certain false, scandalous, malicious and defamatory Libel, (which was understood and intended to be so understood, by the readers of said minutes in the sense hereinafter set forth in the innuendo

and was by the defendant caused to be widely circulated and read in the city of Baltimore and State of Maryland, AS FOLLOWS: THAT is to say:-----

"HE IS NOT TRUE TO HIMSELF NOR TO HIS FRIENDS, THE CONFERENCE SHOULD GET RID OF SUCH MEN". Meaning thereby, he, REV. W. W. COLBERT, Pastor, plaintiff herein named is a knave; a scoundrel and not fit to associate with gentlemen of cloth, or ministers of the gospel, meaning also, He, Rev. W. W. COLBERT, plaintiff herein named, is a MORAL LEPER and to prevent its spread the conference should rid itself of him. To the great damage of the plaintiff,

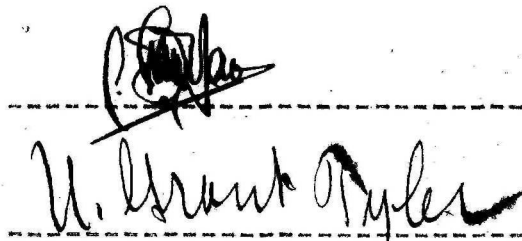
WHEREFORE he claims \$50,000, fifty thousand dollars damages.



PLAINTIFF'S ATTORNEYS.

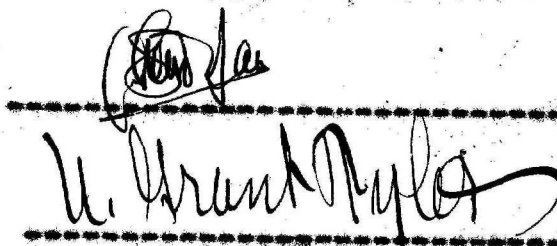
N.B.

Take notice that on the day of your appearance to this action in the *Baltimore City Court* a rule will be entered, requiring you to plead to the within declaration within fifteen days thereafter.



PLAINTIFF'S ATTORNEYS.

THE PLAINTIFF IN THE ABOVE ENTITLED CAUSE, PRAYS, A JURY TRIAL.



PLAINTIFF'S ATTORNEYS.

18th Mar 1922 RENEWED TO APR. R. D. 1922 for James C. Buscove

John F. Kelly
(Kelly)
Thomas F. Kelly
Kelly

222
52

Mar 27
No. 276
435-498

R. D. 1922

Baltimore City Court.

W. W. Colbert

Number 3861

Richard E. Howard

Presiding Elder

vs.
James A. Buscove
et al

WRIT OF SUMMONS

With cop of writ

2 Copies of Nar and Notice to plead
within to be served on defendant.

J. S. Davis et al
Attorney for Plaintiff

Filed _____ day of _____ 1922

FEB 21 1922 RENEWED TO MAR. R. D. 1922

John Jones
(Kelly)

Thomas F. Kelly

Stewart

Clavel

Summons the Baltimore Company & the American Methodist Episcopal Corporation
by service on the Baltimore & Stuart at the Presiding Elder and a copy of the
and notice to plead with a copy of the Brown also with the
Presiding Elder also notice of equal summons also to the
office of Paul Corporation on the 22nd Mar 1922
(Kelly) 3/2/22 Stewart
Stewart

WRIT OF SUMMONS

STATE OF MARYLAND

BALTIMORE CITY, To wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon James A. Briscoe, individually; and
The Baltimore Conference of the African Methodist Episcopal
Church, a body corporate,

RP 3/3/22 Kelly
Rev Charles E. Stewart
Presiding Elder

of Baltimore City, to appear before the Baltimore City Court, to be held at the Court House in the same
city, on the second Monday of ~~February~~ ^{March} inst. ~~xxxxxx~~ to answer an action at the
suit of

W. W. Colbert

and have you then and there this writ.

Witness the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore

City, the 9th day of January 1922.

Issued the 9th day of February in the year 1922.

Geo. Carey Lindsey Clerk.

8
222
52
In the

Baltimore City Court.

W.W. Colbert

VS.

James A. Briscoe
et al

DEMURRER.

Mr. Clerk

Please enter my appearance for The Baltimore Annual Conference of the African Methodist Episcopal Church, defendant, and file this Demurrer.

John Watson
Attorney for Demurrant

Service of copy of this Demurrer admitted this 22nd day of March 1922.

W. Grant Tyler
Atty for Plaintiff.

Filed Mar 23 - 1922


W. W. Colbert

VS.

James A. Briscoe
et al

IN THE
BALTIMORE CITY COURT.

The Baltimore Annual Conference of the African Methodist Episcopal Church, one of the defendants in this case, demurs to the declaration filed herein and for cause of demurrer says that the said declaration is bad in substance



Attorney for demurrant.

See also
with last
page

12
9 In the ²²²
Baltimore City ⁵²
Court

W. W. Colburn

vs
The Baltimore Conference
of the African Metho-
dist Episcopal Church
a body corporate

An Amended
Declaration

Mr. Clerk
Please file etc

J. Stewart Davis
and Tyler
U. Grant
Attys for Plaintiff

Service of copy admitted
this 21st day of July, 1922
for Plaintiff attys for
within named defendant.

FILED JUL 21 1922

W.W. COLBERT, Plaintiff

VS.

IN THE

Baltimore City Court

The Baltimore Conference of the African

Methodist Episcopal Church, a body corporate

To the Honorable, the Judge of the aforesaid Court:-----

The plaintiff, W.W. Colbert, in this suit, by J. Stewart Davis and U. Grant Tyler, his attorneys, sues the defendant, the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, FOR THAT;-----

During the annual session of the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, from the 20 of April, 1921, to the 24th., day of April, 1921, inclusive, the defendant, by its agent and servants, compiled and composed and published or cause to be composed and published, a certain malicious, false and scandalous article in a pamphlet called, the minutes of the Annual Conference of the Baltimore Conference of the African Methodist Church, a body corporate; Yet the defendant, the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, well knowing the said plaintiff, W.W. Colbert, a minister of the gospel in his capacity as such and contriving and wickedly and maliciously intending to injure the said plaintiff in his good fame and credit and to bring him into public scandal, infamy and disgrace and to cause it to be suspected and believed that the plaintiff had violated his obligation in ordination and had been false and treacherous to his friends, so much so that he had become unfit to

associate with the members of the Baltimore conference of the African Methodist Episcopal church, a body corporate, (an association of christian gentlemen) and they did falsely, wickedly and maliciously compose and publish or cause to be composed and published of and concerning the plaintiff, W.W. Colbert and concerning his conduct, he being a minister of the gospel, a certain false, scandalous, malicious and defamatory libel, concerning his official conduct at West River Circuit and Tee Bee Md., and elsewhere;

That is to say:---

"Tee Bee, Md. Rev. W. W. Colbert, Pastor."

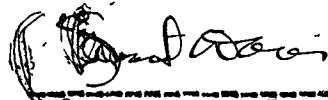
Rev. Colbert has had two appointments this year, but the people at both churches rejected him. he is not true to himself nor to his friends."

The conference should rid itself of such men."

Meaning thereby that he the Rev. W.W. Colbert, was not trustworthy and that he, Rev. W.W. Colbert was false to himself and his friends, alike and as such unfit to be a minister of the gospel, therefore the conference should rid itself of him and others like him. Meaning he was immoral, because like Judas Iscariot he had or would betray a friend. because not being true to himself, it follows as does the day the night he could not nor would not be true to ~~himself~~ others.

That by means of said publication in the minutes of the aforesaid BALTIMORE AFRICAN METHODIST CHURCH, a body corporate throughout its domain, including Maryland, District of Columbia, as well as the ~~other~~ domains of the African Methodist Episcopal Church, including the United States, South America and portions of Africa; by reason of the aforesaid grievance, he the said plaintiff, has been and is greatly injured in his good name and credit and brought into public scandal, infamy and disgrace.


insomuch that divers good and worthy citizens of the commonwealth have, by reason of the aforesaid false, malicious, scandalous libel, suspected and believed and still suspects and believes the plaintiff to have been guilty of the charge made, being lacking in morals and unfaithful to himself and friends; Because also of the said publication the in the minutes of the Annual conference of the Baltimore Conference of the African Methodist Episcopal Church, a body corporate, ministers of the Baltimore conference of the African Methodist Episcopal Church, a body corporate, have refused to allow the plaintiff, W.W. Colbert, a minister of the gospel, to preach in their pulpit or to have any transactions with the said plaintiff as they otherwise would have had causing great pecuniary loss to the plaintiff to the damage of the plaintiff and therefore he brings this suit claiming *Ten Thousand* dollars damages therefor.



U. Grant Pyle

Solicitors for the Plaintiff.


TAKE NOTICE, that on the day of your appearance to this action in the Baltimore City Court, a rule will be entered, requiring you to plead to the within declaration within fifteen days.



U. Grant Pyle

Plaintiff's Attorney

The plaintiff in the above entitled cause prays that this cause may
be tried by a jury of twelve men.



Attorneys for the Plaintiff.

x
72
729
222
52 A

In the

Baltimore City Court.

W.W. Colbert

VS.

The Baltimore Conference of the
African Methodist Episcopal
Church, a body corporate

DEMURRER to Amended Declara-
tion.

Mr. Clerk

Please file

Geo. W. ...
Attorney for Defendant

✓ FILED AUG 3 1922

Filed Aug 3rd 1922

W. W. Colbert

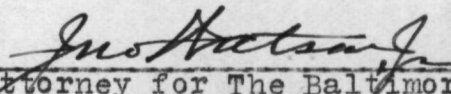
VS.

The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

IN THE
BALTIMORE CITY COURT.

The Baltimore Conference of the African Methodist
Episcopal Church, by John Watson, Jr., its attorney, demurs
to the amended declaration in the above entitled case and
for cause of demurrer says:

That the declaration is bad in substance and
insufficient in law.


Attorney for The Baltimore Conference
of the African Methodist Episcopal
Church.

Wilson vs Cottman 65 Md 190

Fraternas Alliance vs Mallahan

87 Md 97 -

Goldsbrough vs Orem

103 Md -

Dewitt vs Scarlett et al

113 Md 47

Standard vs Wilcox ^{and Gibbs et.}

118 Md 151 -

Libel: words affecting one in
business credit or profession:

Jewro vs Daily ~~Record~~ of Cumberland
87 Md 466

~~Stoddard vs Wilcox~~
Powell vs American Towing Company
131 Md 542

Tyler's Notes

²²/₉ In the
Baltimore City
Court

W. W. Colbert alias
William W. Colbert

vs The
Baltimore Annual
Conference of the
African Methodist
Episcopal Church a
body corporate

~~and~~
Amended Narr

in Clerk's
Please file etc
J. Grant Pyle and
J. Stewart Davis atty
for Plaintiff

Service admitted this
29th day of Jan, 1923 and
atty John Watson
att'y for Def.

Filed 29 Jan 1923
Per J. P. Poyer

IN THE
W.W.Colbert, alias, William W.Colbert #
Baltimore City Court.

VS.

The Baltimore Annual Conference of the #

African Methodist Episcopal Church, #

a body corporate #

To the Honorable, the Judge of the aforesaid Court;

FIRST COUNT.

The plaintiff, W.W.Colbert, alias, William W.Colbert, by his attorneys, J.Stewart Davis and U.Grant Tyler, sues, the defendant The Baltimore Annual Conference of the African Methodist Episcopal Church, a body corporate, FOR THAT;

The plaintiff, W.W. Colbert, alias, William W. Colbert, while being a minister of the Baltimore Annual Conference of the African Methodist Episcopal Church, a body corporate, in good standing and while stationed by appointment of Bishop, J.Albert Johnson, at Tee Bee, Md. and West River Circuit during the conference year ending on or about April, 24th. 1921; and while the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate was in session of its one hundredth and fourth session at Bethel A.M.E.Church, anvale street and Druid Hill avenue, the defendant corporation in the regular course of business passed the character of the plaintiff, the Rev.W.W.Colbert, alias, William W. Colbert and he was by the said conference in due course of appointment, made an Evangelist, the sent out or commissioned to preach the gospel of the New Testament and such of the Old estament as was and is authorized by authority of the said General Conference of the African Methodist Episcopal Church, a body corporate and while he the said Rev.W.W.Colbert, alias, William W.Colbert was stationed at the aforesaid church, Tee Bee, Md. and West River circuit, he the said W.W.Colbert, alias, William W. olbert,, was by a certain woman (Annita Pierson) charged with being the father of her bastard child and caused the plaintiff, W.W.Colbert, alias, William W.Colbert, to be arrested, presented, indicted and upon which said indictment he was arraigned, plaaded not guilty and tried and found not guilty by a jury in the criminal court of baltimore city Acertified copy of which record is annexed hereto and prayed to be taken as a part of this count and marked exhibit, (A);

Thereupon the presiding Elder of the Potomac District, the Rev. James A. Briscoe, visited in person the congregation or congregations and reported to themZ in substance that he the presiding Elder of the Baltimore Annual Conference of the African Methodist Episcopal Church, a body corporate, of which the right Rev.J. Albert Johnson, D.D. was presiding Bishop and J.A.Young, secretary, found no fault in him the REv. W.W. Colbert, alias, William W. Colbert, pastor, then at Tee Bee, Md. and west river circuit as the o Griminal Court of Baltimore City had found him not guilty and he the said presiding Elder of the Potomac District of the Baltimore Annual Conference of the African Methodist Episcopal Church, a body corporate, had no additional evidence in his possession against him and colud not hold him guilty of of the aforesaid charge and he the aforesaid, presiding Elder, aforesaid reported the same to the Baltimore Annual Conference, upon which report the Baltimore annual conference of the african methodist episcopal church, a body corporate (after having heard the report of the said presiding elder, James A. Briscoe aforementioned) passed the character of W.W.Colbert, alias, William W.Colbert, plaintiff, herein named, and a vote of conference given him upon which vote of confidence the right Rev. J.Albert Johnson, D.D. presiding at the 104th. annual session of the baltimore annual conference of the african methodist episcopal church, a body corporate, issued a commission to W.W.Colbert alias, William W.Colbert, to preach as a Missionary in any and all the churches in the connection and any

other evangelical church which would recognize his relations as an elder, notwithstanding that, the defendant corporation by its duly authorized agents, compiled, composed, published or caused to be and circulated or caused to be circulated in the minutes of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate, thru its publication committee, namely, A.L. Gaines, J.W. Norris, J.R. Nelson, Frederick Douglas, M.H. Bavis, C.H. Young, D.G. Hill, C.H. Steptean, and C.A. Williams, committee, appointed by and authorized by the Baltimore conference of the African Methodist Episcopal Church, a body corporate, to compile and publish the minutes as was compiled and made at Bethel A.M.E. Church, at Lanvale street and Druid Hill avenue, Baltimore city, Maryland, containing certain false, scandalous, malicious, defamatory and libellous matter of and concerning W.W. Colbert alias, William W. Colbert, in his office and conduct as a minister of the gospel of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate.

TO WIT; Tee Bee, Md. Rev. W.W. Colbert, Pastor: Rev. Colbert has had two appointments this year but the people at both churches rejected him. He is not true to himself nor to his friends. The conference should rid itself of such men,

Which was understood by the readers of the minutes in the sense herein after mentioned.

That the Rev. W.W. Colbert, alias, William W. Colbert, minister of the gospel, plaintiff herein named, had been rejected by a majority of the members of the churches at Tee Bee, Md. and West River circuit, which was the cause of his removal.

Meaning he the said W.W. Colbert alias, William W. Colbert, had committed adultery or fornication or prostitution.

The aforesaid committee by authority of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate, having published or caused to be published and circulated and read the minutes of the aforesaid conference containing the aforesaid, false, defamatory, malicious and libellous matter of and concerning the plaintiff, W.W. Colbert alias, William W. Colbert concerning his character and conduct in his official capacity as a minister of the gospel and conduct in his failure to perform his duties as a minister so as to require himself to be rejected as a minister at Tee Bee, Md. and West River circuit to his great damage, WHEREFORE, he the said W.W. Colbert, alias, William W. Colbert, having been wholly deprived of the means whereby he made his living by the action of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate and he the said plaintiff claims fifty thousand dollars damages, (\$50,000).

SECOND COUNT.

The plaintiff, W.W. Colbert, alias, William W. Colbert, by his attorneys, J. Stewart Davis and U. Grant Tyler, sues, the defendant, The Baltimore annual Conference of the African Methodist Episcopal Church, a body corporate, FOR THAT;

The defendant, the Baltimore annual Conference of the African Methodist Episcopal Church, a body corporate, while in session at Lanvale street and Druid Hill avenue, Baltimore City, Maryland, from the 30th day of April, 1921, to the 24th day of April, 1921;

The right Reverend J. Albert Johnson, D.D., presiding, Rev. D.G. Hill
Rev. Frederick Douglas, pastor, with Rev. J.A. Young, secretary, of
the conference, a body corporate, by its agents, did publish or
cause to be published and circulated in the minutes of the Bal-
annual conference of the african methodist episcopal church, a
body corporate, in the city of baltimore, Tee Bee, Md. and west
river circuit and elsewhere thru out the jurisdiction of the
african methodist episcopal church, the false, scandalous, malici-
ous, defamatory and libellious matter of and concerning, W.W.
Colbert, alias, William W. Colbert, as a minister of the gospel
and circulated and caused to be circulated and
or caused to be circulated and read in baltimore city and
wherever the african methodist episcopal church is located, by
its agents, well knowing the premises, that is to say, that, the
Rev. W.W. Colbert, alias, William W. Colbert, was not guilty of a
adultery or fornication or prostitution and was not rejected by
a majority of the members of Tee Bee, Md. and west river circuit
yet the defendant corporation, by its agents, wickedly, contriving
ly and maliciously intending to injure the ##### the
plaintiff, W.W. Colbert, alias, William W. Colbert, in his good
name, fame and credit among his neighbors and to bring him the
said W.W. Colbert, alias, William W. Colbert into public scandal,
infamy and disgrace in baltimore city, Tee Bee, Md. and west river
circuit and elsewhere wherever the minutes of the baltimore annual
conference of the ^{african} methodist episcopal church, is read and circulat-
ed thru out the jurisdiction of the african methodist episcopal
church, a body corporate, ~~the~~, NAMELY:

Tee Bee, Md., Rev. W.W. Colbert, Pastor.

Rev. Colbert has has had two appointments this year but the people
at both churches rejected him.

He is not true to himself nor to his friends, The conference
should rid itself of such men.

Which was understood by the readers of the minutes of the one
hundredth and fourth annual session of the african methodist epis-
copal church a body corporate in the sense herein after mentioned.

That he the plaintiff, W.W. Colbert, alias, William W. Colbert, was
by a majority of the members of Tee Bee, Md. and west river circuit
not wanted as their minister.

MEANING, also that he the Rev. W.W. Colbert, alias, William W. Colbert
is not true to himself nor to his friends, therefore is not worthy
of the confidence nor respect of gentlemen, beware of him.
NOTWITHSTANDING, the conference, the baltimore annual conference
of the african methodist episcopal church, a body corporate, had
passed his character, (the Rev. W.W. Colbert, alias, William W. ~~the~~
Colbert,) that is, gave him a vote of confidence and the presiding
Bishop, the Right Reverend J. Albert Johnson, D.D., had commissioned
him; W.W. Colbert, alias, William W. Colbert, a Missionary, author-
-izing ~~the~~ and empowering him, W.W. Colbert, alias, William W.
Colbert, to go into all the world, in the name of and and by the
authority of the african methodist episcopal church aforesaid and
preach the gospel aforesaid, that the said defendant, a body cor-
porate, by its agents, its committee, authorized and empowered to
have printed and published and caused to be published the minutes
of the baltimore conference of the african methodist episcopal
church, NAMELY; Rev. A.L. Gaines, J.W. Norris, J.R. Nelson, Frederic
Douglas, M.H. Davis, C.H. Young, D.G. Hill, C.H. Steptean, and C.A.
Williams which said committee, agents of the 104th. annual session
of the baltimore annual conference of the african methodist episco-
pal church, said agents published the minutes aforesaid, containing
the above named libellious matter of and concerning, W.W. Colbert,
alias, William W. Colbert, of and concerning his character, conduct
or duties and or fitness to perform the duties of a minister of ~~the~~

of the gospel at Tee Bee, Md. and west raver circuit in the jurisdiction of the african methodist episcopal church, aforesaid, and did by ~~the~~ agents aforesaid, falsely, scandalously, maliciously, maliciously, defamatorily and libelliously publish or cause to be published and circulated and read of him, (W.W. Colbert, alias, William W. Colbert);

BY MEANS of of which grievance, he the said plaintiff, W.W. Colbert, alias, William W. Colbert, has been and is greatly injured in his good name, fame and credit and brought into public scandal, infamy and disgrace insomuch that the good and worthy citizens of this commonwealth and thru out the jurisdiction of the african methodist episcopal church, and has by reason of of committing said grievance from hence forth hitherto wholly been refused to have any transaction or be allowed to preach in any of the pulpits of any african methodist episcopal church, BY MEANS of which he the said plaintiff, W.W. Colbert, alias, ~~##~~ William W. Colbert, has hitherto made his living, which said publication has been the means of depriving him the said plaintiff of his means of a livillhood to his great damage and detriment WHEREFORE, he the aforesaid plaintiff, claims damages to the amount of fifty thousand dollars;(\$50,000,),

J. Stewart Davis
W. Grant Pyles
Attorneys for the plaintiff.

N.B:

Take notice that on the day of your appearance to this action in the Baltimore City Court a rule will be ~~###~~ entered requiring you to plead to the within declaration within fifteen days thereafter.

J. Stewart Davis
W. Grant Pyles
Attorney for the plaintiff.

The plaintiff in the above entitled cause prays a jury trial.

J. Stewart Davis
W. Grant Pyles
Attorneys for the plaintiff.

2489
1928

STATE OF MARYLAND,

vs.

William W. Colbert

(Signature)

Short Copy of Docket Entries

(Exhibit A)

State of Maryland

vs.

William W. Colbert

IN THE

Criminal Court of Baltimore

No. *2489*

May Term, 192*3*

Charge, *Bastardy*

Prosecuting Witness
Annetta Pierson

Commitment filed,

Appearance - J. S. Smith & U. S. Kaufman

Recognizance filed,

30th July

Presentment filed—e.—d.—Capias issued—*cepi*, *On Bail*

25th Oct

Recognizance taken, *Philip Bernman \$500—*

28th "

Indictment filed,

27th Oct

Arraigned and pleads,

Submits under plea, *Not Guilty* ^{and issue} before *Jury Sworn, Bond J*

17th Nov

Verdict: *Not Guilty*

" "

Judgment: *L. E. S. D*

" "

STATE OF MARYLAND,

Baltimore City, to wit:

I Hereby Certify that the foregoing is a true Copy of the Docket entries in the aforesaid case, taken and copied from the record of proceedings of the Criminal Court of Baltimore.

In Testimony Whereof, I hereto set my hand and affix the seal of

the Criminal Court of Baltimore, this *Twenty-fifth*
25th day of *January* A. D., 19*23*

Edward Gross
Clerk Criminal Court of Baltimore.

In The ²²²/₅₂
Baltimore City
Court

W. W. Colbert alias,
William W. Colbert

vs

The Baltimore Annual
Conference of the
African Methodist
Episcopal Church a
body corporate

Motion to Strike of
Demurrer and Cases
assigned

in Clerk
Please file etc

J. Steward Davis
and U. Grant Pyles
Attys for Plaintiff

Service admitted and
Copy left this 16th day
of Feb, 1923

W. W. Colbert
Dft City

Filed 16th February 1923.

W.W.Colbert, Alias,William W. Colbert

VS.

The Baltimore Annual Conference of the African Methodist Episcopal Church, a body corporate

"
"
"
"
"
"
"
"
"
"
"
"

IN THE

Baltimore City Court.

To the Honorable, the Judge of the aforesaid Baltimore City Court:

The plaintiff, W.W. Colbert, alias, William W. Colbert, by his Attorneys, J. Stewart Davis and U. Grant Tyler;-----

Moves this honorable Court to strike out the Demurrer of the defendant, the Baltimore Annual Conference of the African Methodist Episcopal Church, a body corporate, for the following reasons:--

1.

Because under Rule seven of the Rules of the Supreme Bench of Baltimore City; To wit:---

"No demurrer, or motion or other paper which may require a hearing by the Court in advance of trial of the whole case on the merits shall be filed until after a copy thereof shall have been served upon the opposite party or counsel of record or otherwise in accordance with the provisions of Rule 11; and the matter of such demurrer motion or other paper shall stand for hearing, without further notice at the first convenient opportunity on a day set apart for such hearings, after five days from the service

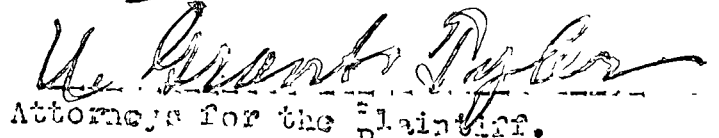
of a copy of the papers aforesaid.

RULE 11.

Every notice shall be in writing, and, together with a copy of the pleading or paper to which it refers, shall be served on the Attorney of record of the party to be affected by it, or left at the office of such attorney.

We, the attorneys of record in the above entitled cause, individually say, that no service of the demurrer filed in this cause or a copy thereof has at any time since the filing of the Amended "Harr" in the above entitled cause been served on us or has a copy been left at either of our respective offices.

Because further we have been denied due process of Law to the end therefore, we move that the demurrer be stricken from the files of this Honorable Court.



Attorneys for the Plaintiff.

In the
Baltimore City Court.

W.W. Colbert

VS.

The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

DEMURRER to second amended
Declaration.

Mr. Clerk

Please file

W. H. Atsaga
Attorney for The Baltimore
Conference of the African
Methodist Episcopal Church.

Filed 8th February 1923.

W. W. Colbert

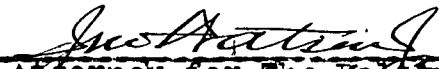
VS.

The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

IN THE
BALTIMORE CITY COURT.

The Baltimore Conference of the African Methodist Episcopal Church, by John Watson, Jr., its attorney, demurs to the second amended declaration in the above entitled case and for cause of demurrer says:-

That the declaration is bad in substance and insufficient in law.



Attorney for The Baltimore Conference of the African Methodist Episcopal Church.

222
52

In the
Baltimore City Court.

W.W. Colbert

VS.

The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

DEMURRER.

Mr. Clerk

Please file


Sol'r for Defendant

Service of copy admitted
this day of February, 1923

Sol'r for Plaintiff

Filed 19th February 1923

W. W. Colbert

VS.

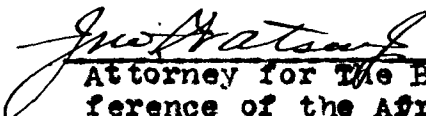
The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

IN THE

BALTIMORE CITY COURT.

The Baltimore Conference of the African Metho-
dist Episcopal Church, by John Watson, Jr., its attorney,
demurs to the second amended declaration in the above en-
titled case and for cause of demurrer says:-

That the declaration is bad in substance and
insufficient in law.



Attorney for the Baltimore Con-
ference of the African Methodist
Episcopal Church.

STATE OF MARYLAND

CITY OF BALTIMORE. to wit:-

I HEREBY CERTIFY that on this 19th day
February in the year nineteen hundred and twenty-three,
before the subscriber a Notary Public of the State of Mary-
land in and for the City of Baltimore aforesaid, personally
appeared C. Rollins Rogers and made oath in due form of
law that a copy of the foregoing Demurrer was served upon
U. Grant Tyler of counsel for plaintiff, February 19th,
1923.

Witness my hand and notarial seal.


Notary Public.

²⁹
In the
Baltimore City Court
W. W. Colbert alias,
William W. Colbert
vs
The Baltimore Annual
Conference of the
American Methodist
Episcopal Church
body Corporate

3rd Amended Narr
Action for Libel

Mr Clerk
Please file etc

J. Stewart Davis
and
U. Grant Tyler
Attys for Plaintiff

~~Done at Baltimore~~
~~May 11th 1923~~
The Court

Filed 11th May 1923.

W. W. Colbert, alias, William W. Colbert # IN THE
 VS. #
 The Baltimore Annual Conference of the African #
 Methodist Episcopal Church, a body corporate # Baltimore City Court.

W. W. Colbert, alias, William W. Colbert, by J. Stewart Davis and U. Grant Tyler, his attorneys, sues, the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate, incorporated under the laws of the State of Maryland and having its principal office in Baltimore City and a resident agent, actually residing in Baltimore City and carrying on part of its business in the city of Baltimore in said state;

FOR THAT, the defendant corporation is part owner of a printing establishment which prints and publishes a paper and other periodicals, among them is a pamphlet, called the minutes of the one hundred and fourth annual session of the Baltimore conference; during the conference year of 1920 and 1921, REV. W.W. Colbert was stationed at West River and Tee Bee, Md., while stationed he, the said, W.W. Colbert was wrongfully charged by a woman of Baltimore City of being the father of her bastard child, he the said, W.W. Colbert, alias, William W. Colbert, plaintiff, herein, was tried in the Criminal Court of Baltimore City of said charge and found not guilty:

Thereupon, the presiding elder of the Potomac District, the Rev. James A. Briscoe, acting in the capacity as agent of the said defendant corporation, visited in person the congregation and congregations of which the Rev. W.W. Colbert, alias, William W. Colbert, was pastor, and reported or explained to them (in substance, that he as agent and presiding elder of the Baltimore annual conference of the African Methodist Church, a body corporate, of which, the Right Rev. J. Albert Johnson, D.D. was presiding bishop and J.A. Young, secretary, found no fault in him, the Rev. W.W. Colbert, alias, William W. Colbert, minister of Tee Bee, Md. and West River circuit as the court had found him not guilty and he their acting and duly accredited agent had no additional evidence in ~~his~~ possession of which he, the said, James A. Briscoe Presiding elder of the ~~the~~ Potomac District of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate could hold him, the said W.W. Colbert, alias, William W. Colbert, guilty of the aforesaid charge as made against him by the woman charging him with being the father of her bastard child, which, he the said presiding elder, agent of the defendant corporation, reported to the said defendant corporation, upon which, report, The Baltimore annual Conference of the African Methodist Episcopal Church, a body corporate (after having heard the report aforesaid of their agent, the Rev. James A. Briscoe, presiding elder of the ~~the~~ Potomac District, of the said defendant corporation) passed the character of ~~W.W. Colbert~~, alias, William W. Colbert and upon the strength of said vote of confidence, the Right, Rev. J. Albert Johnson, D.D., presiding at the 104th. annual session of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate, issued a commission to W.W. Colbert, alias, William W. Colbert, authorizing and empowering him, the said plaintiff, to preach as a missionary in any or all the churches in the connection and any other evangelical church, which would recognize, his relation or orders as an Elder, NOTWITHSTANDING THAT, the defendant corporation by its duly authorized agents, composed, compiled, published or caused to be published and circulated or caused to be circulated in the pamphlet called the minutes of the Baltimore annual Conference of the African Methodist Episco-

-pal Church, a body corporate, thru its publication committee, NAMELY; A.L. Gaines, J.W. NORRIS, J.R. Nelson, Frederick Douglas, M.H. Davis, C.H. Stepteau, and C.A. Williams, which said committee was appointed and authorized and empowered by the Baltimore conference of the African Methodist Episcopal Church, a body corporate, to compile, compose and publish and circulate the pamphlet or minutes of said defendant corporation as was compiled and made at Bethel A.M.E. Church between the 20th. day of April and the 24 th. day of April, 1921, at ~~DAW~~ street and druid Hill avenue, Baltimore City, Maryland, containing certain false, scandalous, malicious, defamatory and libellous matter of and concerning W.W. Colbert, alias, William W. Colbert, in his office and conduct as a minister of the gospel of the Baltimore annual conference of the African Methodist Episcopal Church, a body corporate:

WHICH SAID PAMPHLET or minutes, the defendant corporation, published and circulated throughout the City of Baltimore, the state of Maryland and other States in the united States, ~~### and #####~~

AND FOR THAT the plaintiff is and for many years last past has been a citizen and resident of the state of Maryland and has always been deeply interested in the moral uplift and welfare of the colored people thereof and has continuously for many years last past devoted his time, thought and energies and faculties to the advancement of his people, particularly as a minister of the gospel to the civic, social and moral uplift and as such, the plaintiff, W. W. Colbert, alias, William W. Colbert, has always conducted himself above reproach and until the committing of the wrongs and grievances by the defendant, herein after mentioned by the defendant, was reputed and esteemed by and among all his neighbors and other good and worthy citizens of Baltimore, state of Maryland and the united States to whom he was in anywise known as a person of good name, fame, credit and of good moral character in his public and private life and as personally and morally interested in the welfare and improvement of the morals and wellbeing of others of his race:

THAT the plaintiff, W.W. Colbert, alias, William W. Colbert is and has been a minister of the gospel of the Baltimore Annual Conference of the African Methodist Episcopal church, a body corporate, and as such, the chief requisite of a Christian minister of the gospel, is his sincerity for the sake of his influence among the members of his Church, congregation and the denomination as well as among other good and respectable citizens of Baltimore City, state of Maryland and elsewhere: THAT THERE RIGHTFULLY exists a deep and widespread aversion, hostility and a desire to shun and a deep and acute sentiment among the people of his church, congregation and his race generally to ostracise any one who is reputed, charged or believed to be false to himself or to a friend, it is so prevalent that he, the said plaintiff, W.W. Colbert, alias, William W. Colbert has been wholly cut off from preaching the gospel among his people, altho he has been licensed or authorized by the Baltimore annual conference of the African Methodist Episcopal Church, so to do and is shunned as though he be a leper, more particularly because he, the said plaintiff is a minister of the gospel and being in the public eye constantly does the charge or false charge by his conference hinder, hamper, obstruct and impair his usefulness among good and worthy citizens of Baltimore City, Maryland, and wherever the minutes are circulated and read, many worthy citizens believe the false scandalous and de-

famitory and libelious matter to be true, so deep and acute and universal among respectable people and among his fellow churchmen has the false, scandalous, malicious matter been circulated, read and believed or suspected, (having been cunningly circulated by persons whose standing and integrity counts amont the members of said defendant corporation, that the plaintiff has been an object of ridicule, contempt, hatred, obloquy, scorn and octracism-upon the part of virtually the whole membership of the African Methodist episcopal church and become generally condemned, dreaded, hated and ostracised by said members of the African Methodist Episcopal church, a body corporate, throughout America, both North and South and West Indies and Afirca and among other good and lawful citizens of Baltimore City and State of Maryland and Americas.

THAT THE Plaintiff has never been guilty or accused until the time herein mentioned or ever been believed or accused or suspected to be capable of being guilty of such infidelity or perfidy either to himself or to a friend; BUT on the contrary he is a true friend even loves his enemies and constantly prays for them, who deceitfully and maliciously wrong him; AND NEVERTHELESS, the defendant corporation well knowing the premises, yet, contrivingly, wickedly, maliciously and intending to injure him, the plaintiff in his good name, fame and credit, reputation and in his social relationship as well as him the plaintiff in his capacity as a minister of the gospel of the African Methodist Episcopal church and to bring him into public scandal, disgrace and infamy with and among other worthy citizens of the city of Baltimore, State of Maryland, and elsewhere and cause it to be suspected and believed by his said neighbors and associates and to oppress, injure and ruin the plaintiff, did, on or about or between the 20th., day of April, 1921, and the 24th., day of April, 1921, in a certain pamphlet or minutes by them printed, published or caused to be printed or published and caused to be circulated in Baltimore city State of Maryland, and elsewhere, CALLED THE MINUTES OF THE ONE HUNDRED AND FOURTH ANNUAL SESSION OF THE BALTIMORE CONFERENCE.

HELD IN BETHEL A.M.E. CHURCH, LANVALE STREET AND DRUID HILL, AVE.
BALTIMORE Md.

From April, 20th. to April, 24th. 1921.

Conference officers.

Rt. Rev. J. Albert Johnson

Rev. D.G. Hill

Rev. Frederick Douglas

Rev. J.A. Young

Presiding bishop.

presiding elder.

Pastor.

Secretary.

Printed or paid for, published and circulated by the defendant corporation or caused and procured to be circulated throughout the City of Baltimore and State of Maryland and elsewhere wherein large populations of the readers of the minutes or pamphlet and members of the African Methodist episcopal church, a body corporate, and congregations live and reside of and concerning the plaintiff, a certain false, scandalous, defamatory and libelious matter following:
of and concerning the plaintiff;

THAT IS TO SAY:-----

Tee Bee, Md. Rev. W.W. Colbert, Pastor-

Rev. Colbert has had two appointments this year but the people at both church -hes rejected him. He is not true to himself nor to his friends.

The confereñce should rid itself of such men.

West River Circuit: Rev. C.B. Baily, Pastor.-

Rev. Baily has served this charge six months. He has brought the people together after the dark days of Rev. W.W. Colbert 's pastorage.

The future is bright for the work.

THAT THE PERSON REFERRED to in the publication above recited as W.W. Colbert was and is the plaintiff, that by said publication above recited the defendant corporation meant that the plaintiff was a false friend.

That the defendant meant that he the said plaintiff was lacking in one of the chief essentials of a minister of the gospel, namely, SINCERITY, by saying he is false to himself and to his friends.

That the defendant corporation by its agent meant, the Rev. W.W. Colbert by his INSINCERTTY, had driven the members and congregation from West River.

That the defendant corporation by its agent meant that he the plaintiff, W.W. Colbert had been or was derelict in his duties as a minister of the gospel at West River Circuit and Tee Bee, Md.

BY REASON OF SAID Publishing, publication and circulation of the said false, malicious, defamatory and libelious matter the plaintiff has been brought into public ridicule, contempt and hatred among the many good and lawful citizens and has been wholly deprived of the means of his making his livelihood by preaching the gospel by the said false publication and circulation of the scandalous and libelious matter by the defendant corporation, THE Baltimore annual conference of the African Methodist Episcopal Church, a body corporate.

WHEREFORE he the plaintiff claims damages in the sum of fifty thousand dollars.

J. Stewart Davenport
W. Grant Tyler
Attorneys for the plaintiff.

Take Notice.

That on the day of your appearance to this action in the Baltimore City Court a rule will be entered requiring you to plead to the within declaration within fifteen days thereafter.

J. Stewart Davis per U. Grant Tyler

U. Grant Tyler

Plaintiff's Attorneys.

The plaintiff in the above entitled cause prays a jury trial.

J. Stewart Davis per U. Grant Tyler

U. Grant Tyler

Plaintiff's Attorneys.

State of Maryland, Baltimore City

This is to certify that personally appeared before me, the Subscriber, a Notary Public of the State of Maryland, in and for Baltimore City, U. Grant Tyler, one of the attorneys in the above case, and made oath in due form of law that he the said U. Grant Tyler, at about 2:30 P.M. this 11th day of May 1923, left a copy of the above case at the office of John Watson Jr. at 623 Munsey Building with John Walden at 623 Munsey Building.

Arthur E. Briggs
Notary Public

Filed #9 p.72

In the ^{52/22}
Baltimore City Court.

W. W. Colbert

VS.

The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

DEMURRER.

Mr. Clerk:-

Please file.

W. H. H. H.
Atty for Defendant.

Service of copy admitted
this 25th day of May, 1923

U. Green Pyle
Atty for Plaintiff.

Filed 25th May 1923

W. W. Colbert

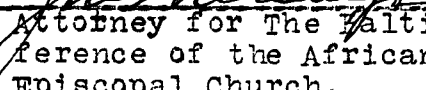
VS.

The Baltimore Conference
of the African Methodist
Episcopal Church, a body
corporate.

IN THE
BALTIMORE CITY COURT.

The Baltimore Conference of the African
Methodist Episcopal Church, by John Watson, Jr., its attorney,
demurs to the third Amended Declaration, filed May 11th, 1923,
in the above entitled case, and for cause of demurrer says:

That the declaration is bad in substance and
insufficient in law.


Attorney for The Baltimore Con-
ference of the African Methodist
Episcopal Church.

Order for Appearance.

$\frac{122}{52}$ $\frac{921380}{9}$

W. W. Colbert

Baltimore City Court.

No.

Return Day 192

VS.

MR. CLERK: Enter

my

appearance for the

Plaintiff

in this case.

*Jamaica Brusca
et al*

Jas E Tippen

Attorney.

Filed

192

FILED SEP 4 1924

222 880
52 9

IN THE BALTIMORE CITY COURT

Box 1187

W. W. COLBERT,
PLAINTIFF

VS.

JAMES A. BRISCOE, individually,
and the BALTIMORE CONFERENCE OF
THE AFRICAN METHODIST EPISCOPAL
CHURCH, a body corporate.

DEFENDANTS.

4th Amended

DECLARATION

1924

Mr. Clerk:
Issue in this case and
send copy of the declaration and
notice with the writ to be served
on the Defendants and make the
writ returnable on the second
Monday of September, 1924.

James E. Tippet
ATTY FOR PLAINTIFF.

JAMES E. TIPPETT
ATTORNEY-AT-LAW
601-603 GAITHER BLDG.
BALTIMORE, MD.

FILED
FILED SEP 4 1924

MR. SHERIFF: PLEASE SERVE COPY

GEO. CAREY LINDSEY,
CLERK BALTO. CITY COURT

*copy of the within Amended Declaration served
on James A. Briscoe on October 10th 1924
in presence of Joseph Stojarsky*

*John C. Potter
Sheriff
Fee 0.50.*

W. W. COLBERT,)	
PLAINTIFF	(IN THE BALTIMORE CITY COURT
VS.)	
	(OF
JAMES A. BRISCOE, INDIVIDUALLY,)	
and the BALTIMORE CONFERENCE OF	(BALTIMORE CITY.
THE AFRICAN METHODIST EPISCOPAL)	
CHURCH, A BODY CORPORATE,	(
DEFENDANTS.)	

4th AMENDED DECLARATION

W. W. Colbert, Plaintiff sues James A. Briscoe and the Baltimore Conference of the African Methodist Episcopal Church, a body corporate.

For that at the time hereinafter mentioned the Plaintiff was a duly ordained minister of the African Methodist Episcopal Church and enjoying the confidence and respect of his friends, associates and acquaintances, and that at said time he was engaged in spiritual and evangelistical work, preaching and speaking at churches in various parts of the State of Maryland, District of Columbia and elsewhere, from which services and work he was earning a large and lucrative income in addition to enjoying a reputation for integrity and honesty, and that the Defendant, The Baltimore Conference of the African Methodist Episcopal Church, a body corporate, held certain sessions or meetings in the City of Baltimore from the 20th day of April 1921 to the 24th day of April, 1921 and that the proceedings at said sessions were duly printed by order of the defendants and recorded in a certain book or pamphlet called "MINUTES OF THE 104th ANNUAL SESSION OF THE BALTIMORE CONFERENCE OF THE AFRICAN METHODIST EPISCOPAL CHURCH", and that in said book or pamphlet the Defendants caused to be printed and published and sent to many other ministers of the said African Methodist Episcopal Church and to various other parties the following false and malicious writings and statements.

"Tee Bee, Md., Rev. W. W. Colbert (meaning the Plaintiff), pastor. Rev. Colbert (meaning the Plaintiff) had two appointments this year, but the people at both churches rejected him (meaning the Plaintiff). He (meaning the Plaintiff) is not true to himself nor to his (meaning the Plaintiff's) friends. The Conference should rid itself of such men


(meaning the Plaintiff).

That shortly after said meetings or sessions at the time hereinbefore mentioned, said book or pamphlet containing said false and defamatory matter was printed and published and sent broadcast to the various churches and ministers who are well known to the Plaintiff, as well as to many members of the congregations of said various churches, and that as a result of the printing and publishing of said false, defamatory and malicious statements the Plaintiff has been brought into disrepute and has been deprived of various employments and engagements from which he would have received large sums of money for his said services and work, and for a more particular account of his damages as a result of said false and malicious statements and the publishing and printing thereof he was deprived of speaking and preaching at the following churches.

THE METROPOLITAN AFRICAN METHODIST EPISCOPAL CHURCH OF WASHINGTON, D. C.
BROWN'S MEMORIAL AFRICAN METHODIST EPISCOPAL CHURCH OF WASHINGTON, D. C.
ST PAUL'S AFRICAN METHODIST EPISCOPAL CHURCH OF WASHINGTON, D. C.
EBERNEZER AFRICAN METHODIST EPISCOPAL CHURCH OF WASHINGTON, D. C.
CAMPBELL'S AFRICAN METHODIST EPISCOPAL CHURCH OF WASHINGTON, D. C.

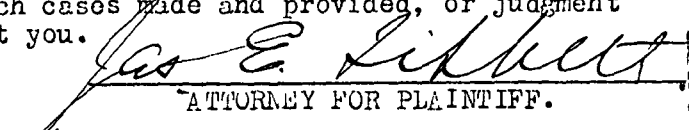
and many other churches in the District of Columbia and the State of Maryland and elsewhere, and from which engagements he would have been paid large sums of money, but all of which was lost by reason of the false, malicious and scandalous statements and writings printed and published by the Defendants as hereinbefore set forth.

WHEREFOR this suit is brought and the Plaintiff claims
\$50,000.00 damages.

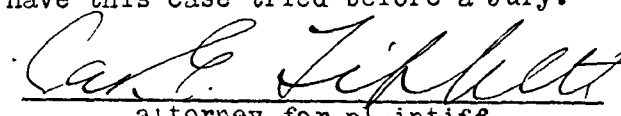

ATTORNEY FOR PLAINTIFF.

TO JAMES A. BRISCOE, individually, and the BALTIMORE CONFERENCE
OF THE AFRICAN METHODIST EPISCOPAL CHURCH, a body corporate,
DEFENDANTS.

TAKE NOTICE: That on the day of your appearance to this action a rule will be entered requiring you to plead to said declaration in accordance with the statute in such cases made and provided, or judgment by default will be entered against you.


ATTORNEY FOR PLAINTIFF.

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


attorney for plaintiff.

X
222
52

In the
Baltimore City Court.

W.W. Colbert

VS.

The Baltimore Annual Confer-
ence of the African Methodist
Episcopal Church &c.,

Def. W.W. Colbert
MOTION FOR JUDGMENT OF

NON PROS.

Mr. Clerk

Please file

W.W. Colbert
~~Atty. for Defendants~~

FILED SEP 10 1924

W. W. Colbert

The Baltimore Annual Conference
of the African Methodist Episcopal
Church

BALTIMORE CITY COURT

12 FEB

CHILDREMAN BOND

REC'D - 101 JAN 25 1924


W. W. Colbert

VS.

The Baltimore Annual Conference
of the African Methodist Episcopal
Church &c.,

IN THE
BALTIMORE CITY COURT

The Defendants in the above entitled case move that the fourth Amended Declaration, filed September 4th, 1924, be not received because the same was not filed within the time limited by the order of this Court, and further move for a judgment of non pros because of such failure to file said amended declaration within the said time.


Atty. for Defendants