

40 232 11/12  
IN THE  
BALTIMORE CITY COUNTY.

MARY ADAMS  
BOX NO 1167  
VS.

JAMES GUY YOUNG.

1427 W. Springton  
Md.

Mr. Clerk:-

Please file.

*Davis Evans*  
Attorneys for Plaintiff.

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

FILED JUL 21 1924

3/32/12

MARY ADAMS :  
VS. :  
JAMES GUY YOUNG :  
IN THE  
BALTIMORE CITY COURT:

Mary Adams, plaintiff by Davis and Evans, her attorneys, sues James Guy Young.

I. For that whereas the plaintiff to wit: on the 29th day of March, 1924 at Baltimore City, in the State of Maryland, was walking along and upon a certain highway known as Mosher Street at or near to its intersection with another certain street or highway known as Calhoun Street at said intersection; and the said defendant was then and there operating an automobile upon and along said streets.

2. And while the said Mary Adams with due care for her own safety was then and there crossing said MOSHER Street at the crossing aforesaid, the defendant, whose duty it was to cause said automobile to approach, pass or turn in Mosher Street at said intersection there with great care, caution and diligence, did then and there so carelessly and negligently cause said automobile to be driven to and around the corner at said intersection, that said automobile ran into and struck against the said Mary Adams with great force and violence and thereby the said Mary Adams was thrown down with such great force and violence unto and against the pavement of said street that she was then and there hurt and wounded and she became and was sick, sore and lame, and disordered and so remained for a long time, to wit: from thence hitherto, during all of which time the said Mary Adams suffered great pain and was hindered from performing her ordinary affairs and in consequence thereof she was forced to and did then and

there spend divers sums of money in endeavoring to cure her hurts and wounds occasioned as aforesaid.

WHEREFORE the plaintiff claims \$50,000.00 damages.

*Davis Evans*

ATTORNEYS FOR PLAINTIFF.

The plaintiff elects to have this case tried before a Jury and prays leave of Court to do so.

*Davis Evans*

ATTORNEYS FOR PLAINTIFF.

TO THE DEFENDANTS:

TAKE NOTICE: That on your appearance to this action in the Baltimore City Court, a rule will be entered requiring you to plead to the aforesaid declaration within thirty days thereafter.

*Davis Evans*

ATTORNEYS FOR PLAINTIFF.

SEP 10 1924

RENEWED TO OCT R. D. 1924

*Mrs. Sof.  
(Keene)*

*John E. Peter  
Sheriff*



*P. 892 1152*

No. *45 Aug* R. D. 192 *4*

# Baltimore City Court.

*Mrs.*  
Mary Adams

vs.

James Guy Young

*1427 N. Lexington  
806 Penna St*

## WRIT OF SUMMONS

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

*Davis & Evans*  
Attorney for Plaintiff

Filed \_\_\_\_\_ day of \_\_\_\_\_ 192

*13.*

*Mrs. Sof.  
(Keene)*

*John E. Peter  
Sheriff*

AUG 14 1924 RENEWED TO SEP. R. D. 1924

*Mrs. Sof.  
(Keene)*

*John E. Peter  
Sheriff*

WRIT OF SUMMONS

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

James Guy Young

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 August next, to answer an action at the suit of

Mary Adams

and have you then and there this writ.

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

City, the 12<sup>th</sup> day of May 1928

Issued the 31<sup>st</sup> day of July in the year 1928

Geo. Carey Ludsay Clerk.

350- 1152

In the  
Baltimore City Court.

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Mary D. Adams  
Plaintiff

vs.

James G. Young,  
Defendant.

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Plea.

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Mr. Clerk:-

Please file, etc.

*Horrad M. Towler*

Attorney for Defendant.

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Service admitted this 13<sup>th</sup> day  
of November 1924.

*Laviet Evans*

Attorney for Plaintiff.

✓  
Filed NOV 13 1924

Mary D. Adams,  
Plaintiff

vs.

James G. Young,  
Defendant.

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In the  
Baltimore City Court.

The Defendant, James G. Young, by Howard M. Towles, his attorney for Plea says:-

That at the time of filing this Plea another action was and is now pending in the Court of Common Pleas of Baltimore City between the same parties and on the same cause of action.

*Howard M. Towles*  
Attorney for Defendant.

State of Maryland, City of Baltimore, to wit:-

This is to certify, that on this 12th day of November in the year nineteen hundred and twenty-four, before me the subscriber a Notary Public of the State of Maryland in and for the City of Baltimore aforesaid, personally appeared James G. Young and made oath and says, that the Plea herewith annexed is true in substance and fact.

As witness my hand and Notarial Seal.

*R. Isabelle Lefferts*



1924  
IN THE <sup>7132</sup>  
BALTIMORE CITY COURT. <sup>vs</sup>

*Sep.*

MARY ADAMS

VS.

JAMES GUY YOUNG

*1425 W Lexington*

AMENDED BILL.

Mr. Clerk:-

Please file.

*Davis Evans*  
ATTORNEYS FOR PLAINTIFF.

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

FILED AUG 6 1924



MARY ADAMS

:

IN THE BALTIMORE CITY

VS.

:

JAMES GUY YOUNG

:

COURT.

The plaintiff, Mary Adams, by Davis and Evans her attorneys says that on or about the 21 day of July 1924 she filed <sup>suit</sup> in this Honorable Court against one James Guy Young.

She is advised by counsel that she may petition this Honorable Court to amend the declaration. Wherefore the plaintiff prays that leave be granted to amend the first paragraph of the plaintiff's declaration and that she may add another paragraph known as paragraph three.

I. For that whereas the plaintiff to wit: on the 29th day of March, 1924 at Baltimore City, in the State of Maryland, was walking along and upon a certain highway known as Calhoun Street at or near to its intersection with another certain street or highway known as Mosher Street at said intersection; and the said defendant was then and there operating an automobile upon and along said streets.

3. And the plaintiff says that the said Mary Adams' injuries and damages were caused by reason of the negligence and carelessness and want of due care on the part of the defendant and not through any negligence on her part contributing directly thereto.

WHEREFORE, the plaintiff claims \$50,000.00n damages.

*Davis & Evans*

ATTORNEYS FOR PLAINTIFF.

Ordered by the Baltimore City Court this <sup>8<sup>th</sup></sup> day of <sup>May</sup> ~~August~~ 1924, that the aforementioned declaration be amended as prayed ~~provided a copy be served on the defendant, James Gay Young~~ on or before the ~~day of~~ 1924.

*Charles F. Stein*

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