

3/1/30

49
7/24
IN THE COURT OF COMMON
PLEAS OF BALTIMORE CITY

BESSIE ANDERSON

VS.

F.W. WOOLWORTH COMPANY, INC

221 - 25 W Lexington St

Mr. Clerk:-

Please file.

J. Steward Davis

George Evans

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

FILED FEB 18 1924

BAUMGARTEN & CO., INC.

BESSIE ANDERSON : IN THE COURT OF COMMON PLEAS
VS : OF
F.W.WOOLWORTH COMPANY :
a body corporate BALTIMORE CITY.

Bessie Anderson, plaintiff by her attorneys, J. Steward Davis and George W. Evans, sues the F.W. Woolworth Company, a body corporate:

For that the defendant to wit: on the 24th day of December, 1923, was a corporation doing business in Baltimore City State of Maryland; that one of the places of business of the defendant is located at 221-225 W. Lexington St. and known as Store No. 31.

That the plaintiff, to wit: on the 24th day of December, 1923 entered the aforesaid store of the defendant for the purpose of purchasing some articles and in fact did purchase some articles. That the defendant by its employees assaulted and beat the plaintiff, imprisoned, detained and restrained her of her liberty at the aforesaid place of business of the defendant.

WHEREFORE the plaintiff was greatly damaged and claims therefore \$5000.00.

J. Steward Davis
George W. Evans
ATTORNEYS FOR PLAINTIFF.

P. 76 $\frac{71}{24}$

[WRIT OF SUMMONS]

STATE OF MARYLAND

No. 49

To March R. D. 1924

Bessie Andersson

vs.

H. H. Woolworth Co
Inc. a body corp.

*Encopy
and
love*

WRIT OF SUMMONS

Action, copy of Nar, and notice to plead
to be served on Defendant.

J. Stewart Davis
George W. Evans
Attorney.

Filed..... day of..... 19

9

[WRIT OF SUMMONS]

STATE OF MARYLAND

BALTIMORE CITY, *to wit:*

To the Sheriff of Baltimore City, Greeting:



You are hereby commanded to summon.....

H. H. Hoolworth Company
a body corporate

of Baltimore City, to appear before the Court of Common Pleas, to be held at the Court House in the same City, on the second Monday of *March* next, to answer an action at the suit of

Bessie Anderson.

and have you then and there this writ:

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

City, the *14th* day of *January* 19*24*
ISSUED *18th* day of *February* 19*24*

James Y. Claypool Clerk.

SHERIFF'S RETURN

SUMMONED F. W. Woolworth Company, a body corporate
A CORPORATION, BY SERVICE ON Levi D. Tollerton, General manager
AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS
LEFT WITH SAID General manager, ALSO NOTICE OF SAID SUMMONS
LEFT AT THE PRINCIPAL OFFICE OF SAID CORPORATION.

(Riley)
2-23-24

Fees - \$1.20 John E. Potee
SHERIFF

1924
~~191~~

IN THE
COURT OF COMMON PLEAS
OF
BALTIMORE CITY.

BESSIE ANDERSON
VS.
F. W. WOOLWORTH CO.

PLEA.

Mr. Clerk:

Please file.

Edwin W. Wells
Atty & Counselor

WELLS & McCORMICK
ATTORNEYS & COUNSELLORS AT LAW
923-24 FIDELITY BLDG
CHARLES & LEXINGTON STS
BALTIMORE, MD.

FILED MAR 6 1924

BESSIE ANDERSON : IN THE
VS. : COURT OF COMMON PLEAS
D. W. WOOLWORTH COMPANY : OF
: BALTIMORE CITY.
:

Mr. Clerk:

The defendant, D. W. Woolworth Company, a body corporate,
by Edwin W. Wells, its attorney, by way of plea to the amended declaration
filed in this case says that the defendant did not commit the wrong
alleged.

Edwin W. Wells
Attorney for defendant.

1934
71

In the
Court of Common Pleas
of
Baltimore City.

BESSIE ANDERSON

vs.

F. W. WOOLWORTH COMPANY

Plea.

F. W. Wells

Mr. Clerk:

Please file.

WELLS & McCORMICK
ATTORNEYS & COUNSELLORS AT LAW
923-24 FIDELITY BLDG
CHARLES & LEXINGTON STS
BALTIMORE, MD.

FILED MAR 6 1934

BESSIE ANDERSON

:

IN THE

VS.

:

COURT OF COMMON PLEAS

F. W. WOOLWORTH COMPANY

:

OF

::


BALTIMORE CITY.

:

:

Mr. Clerk:

The defendant, F. W. Woolworth Company, a body corporate, appears by its attorney, Edwin W. Wells, by way of plea to the declaration filed in this case says that the defendant did not commit the wrong alleged.


Attorney for defendant.

2/24
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IN THE COURT OF COMMON
PLEAS OF BALTIMORE CITY

BESSIE ANDERSON

VS.

Levi B. Tolerton (manager)
F. W. WOOLWORTH COMPANY,
a body corporate.

221-25 N. Light St

P E T I T I O N

and Order

Mr. Clerk:-

Please file.

Steward Davis

George Evans
ATTORNEYS FOR PLAINTIFF

J. STEWARD DAVIS
ATTORNEY AT LAW
215 SAINT PAUL PLACE

BALTIMORE, MD.
FILED FEB 23 1924

Copy of the within Petition and
Order of Court, served on F. W. Woolworth
Company, a body corporate, by service
on Levi B. Tolerton, ^{manager,} on the 25th,
day of February, 1924, in presence
of Harry W. Riley.

John C. Potee,
Sheriff.

Fees - \$ 0.50

2/25/24
124
J.C.P.

BESSIE ANDERSON : IN THE COURT OF COMMON PLEAS
VS. : OF
F.W.WOOLWORTH CO., :
a body corporate : BALTIMORE CITY.

TO THE HONORABLE, THE JUDGE OF SAID COURT.

1. Your petitioner says that on the 18th day of February, 1924, she filed suit in this Honorable Court against the F.W. Woolworth Company, a body corporate claiming \$5000.00 damages.

2. That your petitioner failed to add the usual notice to defendant to plea within thirty days after his appearance. That your petitioner failed to pray a Jury trial.

WHEREFORE your petitioner prays leave to amend the original declaration that the above notice and prayer may be a part thereof.

AND as in duty bound, etc.

J. Steward Davis
George W. Evans
ATTORNEYS FOR PLAINTIFF.

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

Steward Davis
George Evans
ATTORNEYS FOR PLAINTIFF.

TO THE DEFENDANT:

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

Steward Davis
George Evans
ATTORNEYS FOR PLAINTIFF.

Ordered by the Court of Common Pleas of Baltimore City,
this 23rd day of February, 1924 that the aforesaid declaration be
amended as prayed.

James M. Ambler

IN THE COURT OF COMMON PLEAS

Sept Term 1924

TO THE SHERIFF OF BALTIMORE CITY:

SUMMON

To Testify for

Anderson vs G. W. Hookworth Co

returnable

Monday Sept 29th 1924 at 10 O'clock A.M.

Issued

9/27 1924

James J. Clappell Clerk.

In the
Ct. Com. Pleas

Woodworth Co.

ats.

Anderson

Shops. Return

Entd
Jan

SUMMONS FOR WITNESSES

Court of Common Pleas

Bessie Anderson

vs.

F. W. Woolworth Co

Sept TERM, 1924
No. 27 Jury TRIALS

JAMES Y. CLAYPOOLE, CLERK:

Please issue Summons for the following Witnesses:

- Wm H. McCabe ^{sd} 1225 W. Lafayette ave
- Geo S. Ralph ^{sd} 1740 N. Calhoun St.
- J. Nelson Fortune ^{sd} 1101 Arlington ave ^{sd}
- C M Stigile ^{sd} 606 E. 41st St.
- Mrs. Wm Alfred ^{sd} 325 N. Fulton ave
- Miss Emma S. Kreite ^{sd} 309. N. Fulton ave
- Miss Bessie Anderson ^{sd} & Miss Gertrude Anderson 824 N. Carey St
- Mrs Arthur Frey ^{sd} 315 Fulton ave; Mrs Milton Kane ^{sd} 506 Souden ave
- Mrs Walter F. Nehrens ^{sd} 502 Souden ave

to testify for the Plaintiff

returnable Sept 28th the Sept day of 1924, at 10 o'clock A. M. before Judge Symington

Steward Davis
George W. Evans
Attorney for Plaintiff