

47 804 343 53  
IN THE *Baltimore City*  
*Court* OF  
BALTIMORE CITY

GERTRUDE ANDERSON  
**BOX NO 1170**

VS.

F.W. WOOLWORTH COMPANY, INC.

*221-25 N Sepington*

Mr. Clerk:-

Please file.

*J. Steward Davis*

*Georgew. Evans*  
ATTORNEYS FOR PLAINTIFF

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

FILED FEB 18 1924

BAUMGARTEN & CO., INC.

*3/32/13*

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GERTRUDE ANDERSON : IN THE *Baltimore City Court*

VS. : OF

F.W. WOOLWORTH COMPANY, :  
a body corporate : BALTIMORE CITY.

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Gertrude 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 make some purchases. 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*  
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*George W. Evans*  
\_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF.

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IN THE BALTIMORE CITY

COURT. 55

GERTRUDE ANDERSON

VS.

F.W.WOOLWORTH COMPANY, a  
body corporate.

P E T I T I O N

Mr. Clerk:-

Please file.

*J. Steward Davis*  
*George W. Edens*

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

FILED FEB 25 1924

BAUMGARTEN & CO., INC.

GERTRUDE ANDERSON : IN THE BALTIMORE CITY  
VS. :  
F.W.WOOLWORTH CO., a :  
body corporate : COURT.

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TO THE HONORABLE, THE JUDGE OF SAID COURT;

I. 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.

*Steward Davis*  
*George Evans*  
ATTORNEYS FOR PLAINTIFF.

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

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

TO THE DEFENDANT:-

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.

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

Ordered by the Baltimore City Court this 25<sup>th</sup> day of  
1924, that the aforesaid declaration be amended as  
prayed.

Charles H. Hinkley

No. 47 Mar R. D. 192 4

# Baltimore City Court.

Gertrude Anderson

vs.

F. N. Woolworth  
Co

Levi D. Tollerton  
Gen Mgr  
221-25 Lexington St

One Copy WRIT OF SUMMONS  
and with copy of writ  
one Cop of Nar and Notice to plead

within to be served on defendant.

Davis & Evans  
Attorney for Plaintiff

Filed 9 FILED MAR 13 1924 day of 9 192 4

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

*F. W. Woolworth Company  
a body corporate*

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 *March* next, to answer an action at the suit of

*Gertrude 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 *14* day of *Jan* 192*4*

Issued the *28* day of *Feb* in the year 192*4*

*Georgina Lindsay* Clerk.



# SHERIFF'S RETURN

SUMMONED F. W. Woolworth Co. a body corporate  
A CORPORATION, BY SERVICE ON Levi D. Tollerton, Gen'l  
AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS manager.  
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 C. Potee  
SHERIFF

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In the  
Baltimore City Court  
of  
Baltimore City.

GERTRUDE ANDERSON

vs.

F. W. WOOLWORTH COMPANY  
a body corporate

Plea.

✓ FILED MAR 6 1924

Mr. Clerk:

Please file.

*Edmund H. Wells*

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

GERTRUDE ANDERSON

vs.

F. W. WOOLWORTH COMPANY,  
a body corporate

:  
:  
:  
:  
:  
:

IN THE  
BALTIMORE CITY COURT.  
OF  
BALTIMORE, Maryland.

PLEA.

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.

Edwin W. Wells  
Attorney for defendant.

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IN THE  
BALTIMORE CITY COURT  
OF  
BALTIMORE CITY.

GERTRUDE ANDERSON

vs.

F. W. WOOLWORTH COMPANY

PLEA.

Mr. Clerk:

*E. M. Wells*  
*att & secy*

Please file.


✓ FILED MAR 6 1924

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

GERTRUDE ANDERSON : IN THE  
VS : BALTIMORE CITY COURT  
F. W. WOOLWORTH COMPANY, : OF  
a body corporate : BALTIMORE, MARYLAND.  
:

Mr. Clerk:

The defendant, F. 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.

  
Attorney for defendant.