IN THE

BALTIMORE CITY COURT.

344

ABRAHAM H. BOSSOM

**VS.** 

GEORGE W. EVANS.

BOX 1200

DECLARATION.

Mr. Clerk:

Please file, etc.

Attorneys for Plaint

JAMES J. LINDSAY ATTORNEY AT LAW 412 AND 414 EQUITABLE BUILDING BALTIMORE, MD.

FILED:

THEO SEP 25 1923

2/22/8/13

ABRAHAM H. BOSSOM

IN THE

VS.

GEORGE W. EVANS.

BALTIMORE CITY COURT.

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**:::::::** 

State of Maryland, Baltimore City, to wit:

Abraham H. Bossom, by George Keck and James J. Lindsay, his attorneys, sues George W. Evans.

For that the defendant is the owner and operator of an automobile, in the City of Baltimore and elsewhere in the State of Maryland, and at the time of the commission of the wrongs and grievances hereinafter complained of, was such owner and operator and for that on or about the 1st day of September, 1923, whilst the plaintiff was standing on the southwest corner of Pine and Bradley streets, public highways of the City of Baltimore and State of Maryland, and using due care and caution, the automobile of the said defendant, under the management and control of the said defendant, and while being operated in a negligent, careless and reckless manner, ran up and upon said sidewalk, thereby striking and knocking said plaintiff to the said street: whereby the said plaintiff was seriously and permanently injured in and about his left, hip, back, head and other parts of his body: his nervous system was seriously and permanently shocked, and he has been caused to suffer and will continue to suffer great physical pain and mental anguish; he has been hindered and prevented from attending to his accustomed work and duties for a long period of time, thereby losing the emoluments he would have otherwise received from his calling; he has been forced to expend large sums of money for medical attention and treatment, and he was otherwise injured and damaged.

And the said plaintiff says that the injuries to his person and body were directly caused by the negligence, carelessness and recklessness of the said defendant in the premises, and without negligence or want of care on the part of the said plaintiff directly thereunto contributing.

Wherefore this suit is brought and the plaintiff claims
Ten Thousand Dollars (\$10,000.00) damages.

TO THE DEFENDANT:

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 aforegoing declaration within thirty days thereafter.

ABRAHAM H. BOSSOM

IN THE

vs.

GEORGE W. EVANS.

BALTIMORE CITY COURT.

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The Plaintiff elects to have this case tried before a Jury.

Attorneys for Plainting

**Baltimore City Court.** Whenham If Bosson Geo. H. Evans WRIT OF SUMMONS Cop of Nar and Notice to plead within to be served on defendant. Attorney for Plaintiff Filed day of 192

## STATE OF MARYLAND

## BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commande	ed to summon		·	
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· · ·	eorge W E	svans		
of Baltimore City, to appear before the I	Baltimore City Cou	rt, to be held at the	Court, House	in the same
city, on the second Monday of	11ct	nex	t, to answer an	action at the
suit of	·			
Cibi	raham H	Bossom	• · · · · · · · · · · · · · · · · · · ·	
and have you then and there this writ.	•	. •		٠ .
ınitness the Honorable JAMES	S P. GORTER, Ch	ief Judge of the S	upreme Bench o	of Baltimore
City, theday of	Dept		1923	
Issued the 25 day of	Lift	in the year	r 1923	
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