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IN THE COURT OF COMMON PLEAS

OF

BALTIMORE CITY.

CHARLES BROTTON

VS.

PEOPLES' LIFE INSURANCE
COMPANY OF WASHINGTON, D.C.
INCORPORATED.

215 N Schenck St

DECLARATION.

Mr. Clerk:-

Please file.

Davis Evans
ATTORNEYS FOR PLAINTIFF.

DAVIS & EVANS,

~~JOSEPH W. DAVIS~~

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

JUL 27 1925 FILED

BAUMGARTEN & CO., INC.

CHARLES BROTTON

: IN THE COURT OF COMMON PLEAS

VS.

:

OF

PEOPLES' LIFE INSURANCE
COMPANY OF WASHINGTON, D.C.,
INCORPORATED.

:

BALTIMORE CITY.

Charles Brotton, plaintiff by his attorneys, Davis and Evans, sues the Peoples Life Insurance Company of Washington, D.C. Incorporated, defendant.

1. For that the defendant is a corporation duly incorporated in the District of Columbia with authority to utter insurance upon lives in the State of Maryland; that in consideration of the payment by one Bessie Smith, deceased, of a premium of about eight cents and a like sum to be paid to the said Peoples' Life Insurance Company of Washington, D.C., Incorporated, by the said Bessie Smith, deceased, weekly during her life, the defendant made its policy of insurance No. I602210 in writing agreeing to pay the beneficiary therein named the amount named as benefits payable on sufficient proof of death.

2. That on or about the 29th day of May, 1925, Bessie Smith died. That her death was not caused by any of the causes exempted in said policy of insurance and that the said Bessie Smith fulfilled all the conditions of said insurance on her part.

3. That the plaintiff, Charles Brotton was beneficiary under said policy. That the plaintiff has made due proof of the death of said Bessie Smith and his own right as beneficiary under said policy in accordance with the requirements of said policy. That the defendant refused and continues to refuse to pay the amount of the claim though often requested to do so.

WHEREFORE the plaintiff claims \$250.00, 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 DEFENDANT:

TAKE NOTICE: That on the day of 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 above declaration within thirty days.

Davis Evans
ATTORNEYS FOR PLAINTIFF.