

138 1279

IN THE BALTIMORE CITY

34/14 ✓

COURT.

BOX 1325

1008-

PEARL BROWN

VS.

THE AMERICAN BOTTLING COMPANY, a corporation

801 ~~Water~~ St

DECLARATION.

Mr. Clerk:-

Please file.

Davis Evans

ATTORNEYS FOR PLAINTIFF

DAVIS & EVANS
ATTORNEYS AT LAW

FILED OCT 27 1926

BAUMGARTEN & CO., INC.

1 PM
4/14/27
Served
Today to
Am only

242 3/32/5/32

PEARL BROWN : IN THE BALTIMORE CITY

VS. :

AMERICAN BOTTLING COMPANY,
a corporation : COURT

Pearl Brown, by her attorneys, Davis and Evans sues the American Bottling Company, a corporation incorporated under the laws of Maryland, in trespass, for that on or about the 26th day of July, 1926 the said Pearl Brown was riding upon an automobile truck owned by the defendant Company and operated by the defendant's servants and employees.

2. That the said servants and employees of the defendant Company did so wrongfully and negligently operate the aforementioned automobile truck that the plaintiff was thrown violently to the ground to her great damage and injury; that the plaintiff was using due care and caution and was guilty of no negligence contributing to the said accident.

WHEREFORE the plaintiff claims \$10,000 damages.



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 Baltimore City Court, a rule will be entered re-
quiring you to plead to the above declaration within the time
required by law.

Davis Evans

ATTORNEYS FOR PLAINTIFF.

P-707 I279
59

No. 138 Nov. R. D. 192 6

Baltimore City Court.

Pearl Brown

vs.

American Bottling Company,
a corporation.

801 Whittier St

WRIT OF SUMMONS

with copy

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

Davis and Evans

Attorney for Plaintiff

FILED NOV 8 1926

Filed _____ day of _____ 192

13

WRIT OF SUMMONS

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

American Bottling Company, a corporation.

*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 November next, to answer an action at the
suit of Pearl Brown*

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 September 1926

Issued the 20th. day of October in the year 1926

Geo. Carey Lindsay Clerk.

SHERIFF'S RETURN

SUMMONED American Bottling Company
A CORPORATION, BY SERVICE ON William C. Lewis, Secretary
AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS
LEFT WITH SAID Secretary, ALSO NOTICE OF SAID SUMMONS
LEFT AT THE PRINCIPAL OFFICE OF SAID CORPORATION.

Keene #20

(Keene)
11/6/26

John E. Peter
SHERIFF

138 Nov 1279

59c

IN THE
BALTIMORE CITY COURT

1279/59

PEARL BROWN

-vs-

AMERICAN BOTTLING COM-
PANY, a body corporate.

DEMURRER

Mr. Clerk:-

Please file.

Foster H. Fanseen
Attorney for Defendant

Service admitted this 12th
day of November, 1926.

J. Stewart Davis
Attorney for Plaintiff.

FOSTER H. FANSEEN
ATTORNEY AT LAW
431 CALVERT BUILDING
BALTIMORE, MD.

FILED FILED NOV 12 1926

PEARL BROWN

-VS-

AMERICAN BOTTLING COMPANY,
a body corporate.

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IN THE
BALTIMORE CITY COURT.

Now comes the defendant, American Bottling Company,
a body corporate, by Foster H. Fansen, its attorney, and
demurs to the nar, because:

"The declaration of the plaintiff is bad in sub-
stance and insufficient in law."


Foster H. Fansen
Attorney for Defendant.

Memo.

Remover will be

1 Oct 4/4/27
next Monday to

Remover will be

Charles F. Stum

2/10/27

Sunday

20

MARCH

FEBRUARY							S	M	T	W	T	F	S	APRIL						
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1927
3-20-27

J. STEWARD DAVIS
GEORGE W. EVANS

DAVIS & EVANS
ATTORNEYS AT LAW
215 SAINT PAUL PLACE
BALTIMORE

April 1, 1957

Mr. J. Charles Stein

Dear Sir:

In case of Pearl Born vs American
Bottle Co., it is agreed that the demurrer
be sustained. I can not amend my motion
so as to meet the objection raised. Am
detained

J. Steward Davis