3 IN THE BALTIMORE CITY Ja 1-1-COURT. BOX1325 John for manufacture of PEARL BROWN VS. THE AMERICAN BOTTLING COMPANY, a corporation 801 Mation IX DECLARATION. Mr.Clerk:-Please file. Dovis Vevans ATTORNEYS FOR PLAINTIFF 3/32 N 5 N DAVIS & EVANS ATTORNEYS AT LAW ENED OCT 27 1926 BAUMGARTEN & CO., INC.

PEARL BROWN

IN THE BALTIMORE CITY

COURT

VS.

AMERICAN BOTTLING COMPANY, a corporation

Pearl Brown, by her attorneys, Davis and Evans sues the American Bottling Company, a corporation incorporated under the laws of Maryland, in trespassfor that on or about the 26th day of July, 1926 the said Pearl Brown was riding upon an automobile truck owned by the defendan t Company and operated by the defendant's servants and employees.

:

:

That the said servants and employees of the defendant 2. 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 VEva 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 requiring you to plead to the above declaration within the time required by law.

ATTORNEVE BOR DEL

0-707-1279 No. 138 Nov. R. D. 192 6 **Baltimore City Court.** Pearl Brown vs. American Bottling Company, a corporation. 801 Whation 1 st WRIT OF SUMMONS Cop y of Nar and Notice to plead within to be served on defendant. Davis and Evans FILED NOV 8 F1926 day of -Filed 192

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 BaltimoreCity, theI4th.day ofSeptember192 6Issued the26th.day ofOctoberin the year 192 6

in the year 192 6 Med Carey Levels and Clerk.

SHERIFF'S RETURN

SUMMONED anicar Bottling Comfany A CORPORATION, BY SERVICE ON William & Lewis Secretary AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS cretary, also notice of said summons LEFT WITH SAID. LEFT AT THE PRINCIPAL OFFICE OF SAID CORPORATION.

Keene) 16/71

John E. Poter SHERIFF

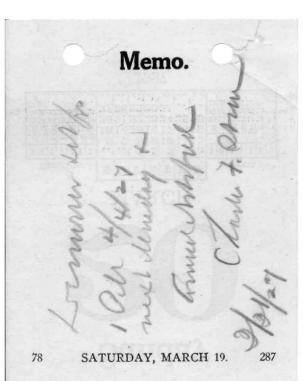
138 Nor 1279 IN THE BALTIMORE CITY COURT 1279/59 PEARL BROWN -78-AMERICAN BOTTLING COM-PANY, a body corporate. DEMURRER Mr. Clerk:-Please file. Attorney for Defendant Service admitted this 12h day of November, 1926. Attorney for Plaintiff. FOSTER H. FANSEEN ATTORNEY AT LAW 431 CALVERT BUILDING BALTIMORE, MD. FILED NOV 12 1926 The Daily Record Co. Print, Balte., Md.

PEARL BROWN		*			
LANCE DUAM		*	IN	THE	
		*			
·	COMPANY,	*	BALTIMORE	CITY	COURT.
AMERICAN BOTTLING		*			
a body corporate.		*			
		*			

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

"The declaration of the plaintiff is bad in substance and insufficient in law."

Jaster H. Janslen Attorney for Defendant.







MARCH

FEBRUARY		S	M	T	W	T	F	S			A	PB	IL	E						
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3-20-27

J. STEWARD DAVIS

Char Stein

DAVIS & EVANS ATTORNEYS AT LAW 215 SAINT PAUL PLACE BALTIMORE

apr4,1927

Neon In ease of Real Born is american Borthing a, disagreed that the derived be surtimed. I can not amend my non to as to meet the objection Naised. and detained f Steevontwan,