

ELSIE TATE

:

IN THE SUPERIOR COURT

VS.

THE MAYOR & CITY COUNCIL  
OF BALTIMORE, a body  
corporate,  
HOWARD L. CRISE and  
CORA EVANS

:

OF

:

BALTIMORE CITY.

Mr. Clerk:-

Please enter the above case agreed and settled upon  
payment of costs by the defendant, the Mayor and City Council  
of Baltimore, a body corporate.

Crise & Evans  
ATTORNEYS FOR PLAINTIFF.

Philip B Perlman  
City Solicitor  
Atty for Mt CC

IN THE SUPERIOR COURT OF  
BALTIMORE CITY.

ELSIE TATE

VS.

THE MAYOR AND CITY COUNCIL  
OF BALTIMORE, a body cor-  
porate,  
HOWARD L. CRISE and,  
CORA EVANS.

ORDER OF SATISFACTION

Mr. Clerk:-

Please file.

*Davis & Evans*

ATTORNEYS FOR PLAINTIFF.

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

*Filed 19-7-25*  
BAUMGARTEN & CO. INC.

	::	
ELSIE TATE,	::	IN THE
	::	SUPERIOR COURT OF
VS.	::	BALTIMORE CITY.
THE MAYOR AND CITY COUNCIL	::	
OF BALTIMORE, A BODY CORPORATE	::	
HOWARD L. CRISE, AND CORA L. EVANS.	::	
	::	

Cora L. Evans, one of the defendants in the above entitled case, for herself only and not for any of the other defendants, by her attorney Charles Jackson, demurs to the declaration in the above entitled case and for reason for her said demurrer, says:

That the declaration in the above entitled case is bad in substance and insufficient at law.

*Chas. Jackson*  
 ATTORNEY FOR DEFENDANT  
 CORA L. CRISE

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY that on this *9th* day of April, 1925, before me, the subscriber, a Notary Public of the State of Maryland in and for the City aforesaid, personally appeared Cora L. Evans, and made oath in due form of law that the foregoing demurrer is not filed for the purpose of delay.

AS WITNESS my hand and Notarial Seal.

*Marie T. Hachemuth*  
 NOTARY PUBLIC.

473  
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IN THE  
SUPERIOR COURT OF  
BALTIMORE CITY.

ELSIE TATE,

VS.

THE MAYOR AND CITY COUNCIL  
OF BALTIMORE, A BODY  
CORPORATE, HOWARD L. CRISE  
AND CORA L. EVANS.

DEMURRER.

MR. CLERK:

PLEASE FILE, ETC.

*Chas. Jackson*  
ATTORNEY FOR DEFENDANT,  
CORA L. EVANS.

*Service of copy of within  
admitted this 19th day of  
April 1925*

*Charles Jackson*  
Att'y for Plaintiff  
CHARLES JACKSON  
ATTORNEY AT LAW  
110 E. LEXINGTON ST.  
BALTIMORE, MD.

ELSIE TATE,	::	IN THE
VS.	::	SUPERIOR COURT OF
THE MAYOR AND	::	BALTIMORE CITY.
CITY COUNCIL, OF BALTIMORE,	::	
A BODY CORPORATE,	::	
HOWARD L. CRISE AND	::	
CORA L. EVANS.	::	

Howard L. Crise, one of the defendants in the above entitled case, for himself only and not for any of the other defendants, by his attorney Charles Jackson, demurs to the declaration in the above entitled case and for reason for his said demurrer, says:

That the declaration in the above entitled case is bad in substance and insufficient at law.

*Chas. Jackson*  
 ATTORNEY FOR DEFENDANT  
 HOWARD L. CRISE.

STATE OF MARYLAND, CITY OF BALTIMORE, to wit:

I HEREBY CERTIFY that on this *2<sup>nd</sup>* day of March, 1925, before me, the subscriber, a Notary Public of the State of Maryland in and for the City aforesaid, personally appeared Howard L. Crise, and made oath in due form of law that the foregoing demurrer is not filed for the purpose of delay.

AS WITNESS my hand and Notarial Seal.

*Mary J. Kachsmuth*  
 NOTARY PUBLIC.

277 Md. 263

IN THE  
SUPERIOR COURT OF BALTIMORE  
CITY.

ELSIE TATE

VS.

THE MAYOR AND CITY COUNCIL  
OF BALTIMORE, A BODY  
CORPORATE, HOWARD L. CRISE AND  
AND CORA L. EVANS.

DEMURRER.

MR. CLERK:

PLEASE FILE, ETC.

*Chas. Jackson*  
ATTORNEY FOR DEFENDANT,  
HOWARD L. CRISE.

Service of copy of within  
admitted this 26 day of  
March, 1925.

*Davis Evans*  
ATTORNEY FOR PLAINTIFF.

CHARLES JACKSON  
ATTORNEY AT LAW  
110 E. LEXINGTON ST.  
BALTIMORE, MD.

*Feb 26 Mar 1925*

ELSIE TATE,

VS.

THE MAYOR AND CITY COUNCIL  
OF BALTIMORE, a body corporate,  
HOWARD L. CRISE and  
CORA L. EVANS.

:

IN THE

SUPERIOR COURT

:

OF

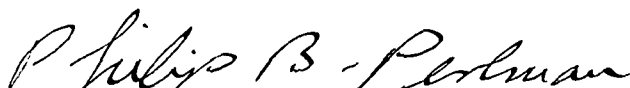
BALTIMORE CITY.

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.. . . .

Now comes the Mayor and City Council of Baltimore,  
a body corporate, one of the above named defendants, by City Solicitor  
Philip B. Perlman, its attorney, and for a plea to the plaintiff's  
declaration filed herein against it, says:

That it did not commit the wrongs alleged.

  
\_\_\_\_\_  
City Solicitor, Attorney for  
Mayor and City Council of Baltimore.

IN THE SUPERIOR COURT OF BALTIMORE  
CITY.

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ELSIE TATE,

VS.

THE MAYOR AND CITY COUNCIL OF BALTIMORE,  
a body corporate, and HOWARD L. CRISE  
and CORA L. EVANS.

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PLEA.

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Mr. Clerk:-

Please file.

*Philip B. Perlman*

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City Solicitor, Attorney  
for Mayor and City Council of  
Baltimore.

FILED MAR 11 1925



ELSIE TATE

:

IN THE SUPERIOR COURT

VS.

THE MAYOR AND CITY COUNCIL :  
OF BALTIMORE, a body cor-  
porate,  
HOWARD L. CRISE AND  
CORA L. EVANS :

OF

BALTIMORE CITY.

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Elsie Tate, by her attorneys, Davis and Evans sues the Mayor and City Council of Baltimore, a body corporate, Howard L. Crise and Cora L. Evans.

I. For that at the time of the grievance hereinafter mentioned, the Mayor and City Council of Baltimore, a body corporate was in duty bound to so maintain the public highways of Baltimore City so that they would not become dangerous to persons who were lawfully using the same; that the other defendants were the owners of certain premises known as nos. 503, 505 and 507 Oxford street in the City of Baltimore, State of Maryland; that the defendants negligently, illegally and wrongfully permitted the sidewalk before the aforementioned premises, to remain in such a dilapidated and torn up condition that the said sidewalk was dangerous to pedestrians lawfully and carefully walking upon the said sidewalk. That the said sidewalk before the aforementioned premises is a part of Oxford street, a public highway of the City of Baltimore. That on or about the 13th day of December, 1924 the plaintiff, while passing along said sidewalk and using due care and diligence on her part, fell into a depression in said sidewalk causing her to fracture one of her limbs and to otherwise become seriously injured about the head, body and limbs.

That as a result of said accident the plaintiff was

required to expend great sums of money for medical attention, nursing and was kept from engaging in her usual duties for a long time and was otherwise damaged; and she claims therefore, ten thousand (\$10,000) dollars damages.

*Atkins & Evans*  
\_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF.

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

*Atkins & Evans*  
\_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF.

TO THE DEFENDANTS: TAKE NOTICE:

That on your appearance to this action in The Superior Court of Baltimore City, a rule will be entered requiring you to plead to the aforesaid declaration within thirty days thereafter.

*Atkins & Evans*  
\_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF.

IN THE SUPERIOR COURT OF

297 BALTIMORE CITY. 263

1925

ELSIE TATE

VS.

THE MAYOR AND CITY COUNCIL  
OF BALTIMORE, a body cor-  
porate,

HOWARD L. CRISE and  
CORA L. EVANS

BOX No. 2422

*Acting Registrar*

Mr. Clerk:-

Please file.

*Deis & Lewis*

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

FILED MAR 5 1925

*Accepted*

2/22/25/17

*Done to file*