

304
49/15
880
60
IN THE
BALTIMORE CITY COURT.

✓
889

LEE FOUNTAIN,

vs.

ALBERT J. GREENE.

BOX 1613

DECLARATION AND
ELECTION FOR JURY TRIAL.

Mr. Clerk:

Issue in this case, and
send copy of the declaration
with the writ to be served
on the Defendant, and make the
writ returnable on the second
Monday of July, 1927.

Leonard Lapman
Benj H. McKindless
Attorneys for
Plaintiff.

BENJ. H. MCKINDLESS
ATTORNEY AT LAW
209-212 NEW AMSTERDAM BUILDING
BALTIMORE, MD.

FILED JUL 8 - 1927

3/32/12/31

LEE FOUNTAIN,
Plaintiff,

vs.

ALBERT J. GREENE,
Defendant.

IN THE
BALTIMORE CITY COURT.

STATE OF MARYLAND,
BALTIMORE CITY, TO WIT:-

Lee Fountain, Plaintiff, by Leonard Liepman and Benjamin H. McKindless, his attorneys, sues Albert J. Greene, Defendant,

For that heretofore, to wit, on or about the 12th day of December, 1926, while the Plaintiff was carefully and prudently crossing a public highway at or near the intersection of Ashland Avenue and Caroline Street, both public highways of Baltimore City, and exercising due and ordinary care in the premises, the Defendant, his agent and servant, carelessly and negligently managed and operated an automobile so that by reason thereof the said automobile ran upon and against the Plaintiff, in consequence whereof the Plaintiff was seriously and permanently injured about the head, body and limbs, caused to suffer great physical pain and mental anguish, to expend large sums of money for medical attention, and was disabled and made sick for a long period of time, whereby he lost the emoluments from his labors he otherwise would have earned, and was otherwise greatly injured and damaged;

And the Plaintiff says that the damages and injuries whereof he complains result directly from the negligence and want of care of the Defendant, his agent and servant, and not from any negligence or want of care on the part of the Plaintiff thereunto directly contributing.

And the Plaintiff claims Five Thousand Dollars damages.

Leonard Liepman

Benjamin H. McKindless
Attorneys for Plaintiff.

LEE FOUNTAIN,
Plaintiff,

vs.

ALBERT J. GREENE,
Defendant.

IN THE
BALTIMORE CITY COURT.

The Plaintiff elects to have the above entitled case
tried by a Jury, and prays that said case may be so tried.

Leonard Lipsman

Benjamin Kindless
Attorneys for Plaintiff.

WRIT OF SUMMONS

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon.....

Albert J. Greene

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 July inst ~~next~~, to answer an action at the suit of Lee Fountain

and have you then and there this writ.

Witness the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore

City, the 9 day of May 1927

Issued the 8 day of July in the year 1927

Greer Lindsay Clerk.

P 846 $\frac{85-0}{60}$
No. 304 July R. D. 192

Baltimore City Court.

See Fountain

John C. Potee Sheriff

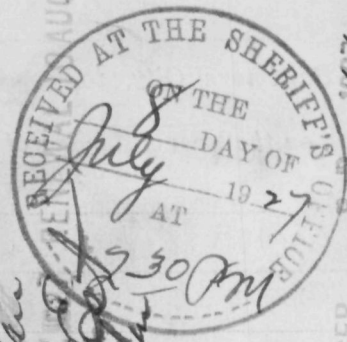
John C. Potee Sheriff

R. D. 1927

vs.

Albert J. Greene

1641 Ashland Ave



WRIT OF SUMMONS

Cop *7* of Nar and Notice to plead within to be served on defendant.

*Noted
Morgan
Norton
Morgan*

Leonard Liepmann

Attorney for Plaintiff

Filed _____ day of _____ 1927

FILED SEP 7 - 1927

RECEIVED AT THE SHERIFF'S OFFICE
SEP 20 1927
Sumnerwood and a copy of Nar and notice to plead
Left with The Deputy Sheriff
(8-18-27)
Greene 95

IN THE BALTIMORE CITY OR

COURT. *850*

500
60
LEE FOUNTAIN

VS.

ALBERT J. GREENE

802
DEFENDANT'S PLEA.

Mr. Clerk:-

Please file.

Lewis Evans
ATTORNEY FOR DEFENDANT

DAVIS & EVANS
ATTORNEYS AT LAW

✓ FILED SEP 6 1927

LEE FOUNTAIN

;

IN THE

VS.

:

ALBERT J. GREENE

:

BALTIMORE CITY COURT

And now comes the defendant, Albert J. Greene, by George
W. Evans, his attorney and for a plea says:

That he did not commit the wrong alleged.


ATTORNEY FOR DEFENDANT

Baltimore City Court.

ROOM 226

January 1928

The Sheriff will please summon the following witnesses:

Returnable on Monday the 9th day of April 1928, at 10 o'clock A. M.

LEE FOUNTAIN,

vs.

GREEN.

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IN THE
BALTIMORE CITY COURT.

(Judge Stanton)

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Mr. Clerk:-

Please issue summons for the following named witnesses to testify on behalf of the Plaintiff, and make the same returnable on the 9th day of April, 1928, at 10 A. M.

- | | |
|------------------------------|-----------------------|
| 10 Lee Fountain, <i>sd</i> | 1228 McCulloh Street, |
| 11 Oscar Wake, <i>sd</i> | 302 Robert Street, |
| 11 Mattie Wake, <i>sd</i> | 302 Robert Street, |
| 14 Helen Wasie, <i>NE</i> | 1602 Mosher Street, |
| 14 Rose Ann Wasie, <i>NE</i> | 1602 Mosher Street. |

Leonard Liefman

Attorney for Plaintiff.

Baltimore City Court.

ROOM 226

Gandy 1928

The Sheriff will please summon the following witnesses:

Returnable on Monday the 9th day of April
1928, at 10 o'clock A. M.

889

LEE FOUNTAIN

:

IN THE

VS.

ALBERT J. GREENE

:

BALTIMORE CITY COURT.

Mr. Clerk:

Please issue summons for the following witnesses in the above entitled case and make the same returnable before the Court on ^{Monday} the 9th day of April 1928 at 10 A.M.:

- 11 Dr. Harry M. Brown, 1835 Madison Ave.
- 4 Dr. Schuman, S.E. Corner Ashland Ave. & Caroline St.

George W. Evans
ATTORNEY FOR DEFENDANT

Baltimore City Court.

ROOM 226

James 1928

The Sheriff will please summon the following witnesses:

Returnable on Monday the 9th day of April
1928, at 10 o'clock A. M.

889

LEE FOUNTAIN

:

IN THE

VS.

ALBERT J. GREENE

:

BALTIMORE CITY COURT.

Mr. Clerk:

14

Please issue summons duces tecum for the Keeper of
Records of the ^{SD} Colonial Hospital requiring him to be and appear
in this Court on the ^{Monday} 9th day of April 1928 at 10 A.M. and
bring with him the records showing the admittance and discharge
of Lee Fountain and the treatment given him on or about the 12th
day of December, 1926.

George W. Evans
ATTORNEY FOR DEFENDANT