IN THE BALTIMORE CITY

COURT.

201

BENNIE JACKSON

VS.

DAVID GOLDSTEIN

DECLARATION.

Mr.Clerk:-

Please file.

J. STEWARD DAVIS ATTORNEY AT LAW 215 SAINT PAUL PLACE

BAUMGARTEN & CO., INC.

VS.

DAY ID GOLDSTEIN

BALTIMORE CITY COURT.

Bennie Jackson, plaintiff by his attorneys, Davis and Evans, sues David Goldstein, defendant.

For that while the plaintiff, to wit: on or about the 3rd day of November, I925 was a passenger in a Premier Cab that was being operated or driven along and upon Holliday street in a southerly direction at or near to the intersection of Holliday street with Water street, both public highways of Baltimore City, the cab in which he was a passenger was struck by an automobile owned and operated by the defendant, said automobile being then and there operated or driven along and upon Water street in a westerly direction at or near to the intersection aforesaid.

And while the chauffeur operator or driver of the cab was operating the cab in a careful manner as aforesaid, the defendant negligently and carelessly ran into and against the cab turning it over and throwing the plaintiff against the sides and walls of the cab, and seriously injured him about the head, limbs and body and as a result thereof he became and was sick, sore, lame and disordered and so remained for a long time, to wit: from thence hitherto during all of which time he was prevented from performing his usual occupation and was forced to and did spend large sums of money in attempting to cure himself of his hurts and wounds occassioned as aforesaid.

And the plaintiff says that all of his injuries as aforesaid and damages were caused by the negligence, carelessness and want of due care on the part of the defendant and that neither

the plaintiff nor the cab driver in anywise contributed there &.
THEREFORE suit is brought and the plaintiff claims
\$5,000.00 damages.

ATTORNEYS FOR PLAINTIFF.

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

ATTORNEYS FOR MAINTEF

TO THE DEFENDANT:

TAKE NOTICE: That on the day of your apprarance 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.

ATTORNEYS FOR PERTUTIFY.

suit of

## STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

David Goldstein

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

next, to answer an action at the

Bennie Jackson

and have you then and there this writ.

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

City, the day of 192

Issued the day of in the year 192

Les Carey Lindsay o

**Baltimore City Court.** Bennie Jackson vs.INTWAL TO WRÍT OF SUMMONS RENEWAL TO of Nar a<del>nd Notice to plea</del>d within to be served on defendant. Davis & Evans Attorney for Plaintiff 192 Filed day of

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Mr. Care Lindson