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1941

IN THE COURT OF COMMON
PLEAS OF BALTIMORE CITY.

WALTER LEOPOLD

VS.

THEODORE MOTTU & COMPANY,
a body corporate.
1022 Pennsylvania Ave

Declaration

Mr. Clerk:-
Please file.

Steward Davis
ATTORNEYS FOR PLAINTIFF.

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

WALTER LEOPOLD : IN THE COURT OF COMMON PLEAS

VS. : OF

THEODORE MOTTU & CO.,
a body corporate : BALTIMORE CITY.

Walter Leopold by Davis and Evans, his attorneys, sues Theodore Mottu and Company; for that Theodore Mottu and Company is a corporation duly incorporated under the laws of the State of Maryland doing business in the City of Baltimore.

I. For that heretofore, to wit: on or about the 11th day of July, 1924 while the plaintiff was lawfully crossing a public highway of Baltimore City at or near to the intersection of Fulton Avenue and Lexington Street, both public highways of the City of Baltimore, he was struck by an automobile of the defendant's, said automobile of the defendant being then and there under the care, control and management of the servants of the defendant, their servants, agents and employees, and the defendant, whose duty it was to cause said automobile to be driven with great care, caution and diligence, did by its servants then and there so carelessly and negligently cause said automobile to be driven^{to} and over said crossing, that said automobile struck against the plaintiff with great force and violence and he was then and there hurt and wounded and he became and was sick, sore and lame and so remained for a long time during all of which time he was prevented from performing his ordinary affairs, and was forced to and did spend divers sums of money in attempting to cure himself of his hurts, and wounds occasioned as aforesaid.

And the plaintiff says that his injuries and damages occasioned as aforesaid were caused by reason of the negligence of carelessness and want of due care on the part of the defendant, its servants, agents or employees and not through any negligence on the part of the plaintiff contributing directly thereto.

WHEREFORE the plaintiff claims five thousand (\$5,000) dollars damages therefor.

Davis T Evans
ATTORNEYS FOR PLAINTIFF.

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

Davis T Evans
ATTORNEYS FOR PLAINTIFF.

TO THE DEFENDANT:

TAKE NOTICE: That on the day of your appearance to this action in The Court of Common Pleas of Baltimore City, a rule will be entered requiring you to plead to the above declaration within the time allowed by law.

Davis T Evans
ATTORNEYS FOR PLAINTIFF.

P 437 ¹⁷²/₂₅

No. 156

To April R. D. 1925

Halter Leopold

Thomas Hughes
Pres

vs.

Theodore Mott & Co

a body corp.
1600 Penn ave

WRIT OF SUMMONS
Copy

Action, copy of Nar, and notice to plead
to be served on Defendant.

Davis & Evans
Attorney.

Filed 13th day of Apr 1925

18

[WRIT OF SUMMONS]

STATE OF MARYLAND

BALTIMORE CITY, *to wit:*

To the Sheriff of Baltimore City, Greeting:

You are hereby commanded to summon

Theodore Motta & Co
a body corporate

of Baltimore City, to appear before the Court of Common Pleas, to be held at the Court House in the same City, on the second Monday of *April* next, to answer an action at the suit of

Walter Leopold,

and have you then and there this writ:

WITNESS, *the* Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City,

the *12th* day of *January* 19*25*

ISSUED *4th* day of *April* 19*25*

James Y. Claypool Clerk.

SHERIFF'S RETURN

SUMMONED Theodore Mottic and Company
A CORPORATION, BY SERVICE ON Theodore Mottic, President
AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS
LEFT WITH SAID President, ALSO NOTICE OF SAID SUMMONS
LEFT AT THE PRINCIPAL OFFICE OF SAID CORPORATION.

Recd \$20

(Bachy)
4/6/20

John E. Potter
SHERIFF

IN THE COURT OF COMMON PLEAS

OF

BALTIMORE CITY.

#

WALTER LEOPOLD

vs.

THEODORE MOTTU & COMPANY, a
body corporate.

#

DEFENDANT'S PLEA.

#

Mr. Clerk:-

Please file, etc.

Bo. Howard England
Defendant's attorney.

APR 11 1925 FILED

WALTER LEOPOLD,

vs.

THEODORE MOTTU & COMPANY,
a body corporate.

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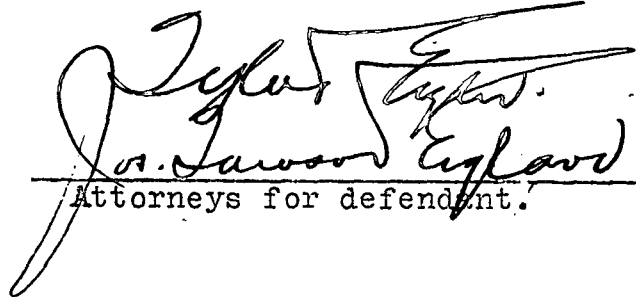
IN THE COURT OF COMMON PLEAS

OF

BALTIMORE CITY.

The defendant, Theodore Mottu & Company,
by Tyler and England, its attorneys, for plea to the plaintiff's
declaration lately against it in this Honorable Court exhibited,
says:-

That it did not commit the wrong or
wrongs therein alleged.



Attorneys for defendant.

IN THE COURT OF COMMON PLEAS

OF

BALTIMORE CITY.

WALTER LEOPOLD,

vs.

THEODORE MOTTU & COMPANY,
a body corporate.

ORDER OF SATISFACTION.

Mr. Clerk:-

Please file, etc.

Rain & Sons

Attorneys for Plaintiff.

John E. ...
Attorneys for Defendant.

FEB 1 1926 FILED

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WALTER LEOPOLD,

vs.

THEODORE MOTTU & COMPANY,
a body corporate.

* IN THE COURT OF COMMON PLEAS
*
*
* OF
*
*
* BALTIMORE CITY.

Mr. Clerk:-

Please enter the above entitled case "settled
and satisfied", upon payment of costs by the defendant.

Stein & Co.
Attorneys for Plaintiff.

John E. ...
Attorneys for Defendant.