

FRANK COHEN and DAVIS MILLER

DECLARATION.

Mr. Clerk:-
Please file.


DAvis e Evans,
ATtorney at law
..--baltimore, mo.
FILED APR 151926
ORANGE PAPKER : IN THE

## VS.

FRATIK COHEN and DAVID MILIER
: BAITIMORE CITY COUZI

Orange Parker, plaintiff by his attorneys, Davas and Evans sues Frank Cohen and David Miller, defendants. I. For that on or about the 2nd day of January,I926 the defendants were the owners of premises known as I526 E.Frirmount Avenue.
2. That the plaintiff and his wife, Alice Iarler were at the time of the accident hereinafter complained of, occupants or tenants in one of the flats or apartments on the aforementioned property or premises.
3. That on or about the 2nd day of January,I926 while the plaintiff's wife with due care for her own satety, was descending the stairs, one of the means of ingress and egress to the above mentioned flat or apartment, she was thrown from the steps to the bottom of a step or one or more of the steps used as aforesaid and as a result thereof she was seriously and permanently injured about the head, limbs and body and she became and was sick, core, lame and disordered and so remained for a. long time, to wit: from thence hitherto during all of which time the plaintiff was deprived of the service and society of his wife,injured as aforesaid and he was forced to and did siend lerge sums of money in attempting to cure his wife of her injures occassioned as aforesaid.

And the plwimeiff goys that all of his wife's injuries and his damages occasioned as aforesaid, were caused by the carelessness, negligence and want of due care on the part of tho defendants or either of them and that neither : the plaintiff nor his wife in anywise contributed thereto:

THEREFORE suit is brought and the plaintiff claims $\$ 5,000$ den ages.


The plaintiff elects to have this case tried before 2 Jury and prays leave of Court to $\alpha 0$ so.

to the mermidaits:
TAKE NOTICE: That on the dey of your appearance to this action in The Baltimore City Court, a rule will be entered requising you to plead to the above declaration within the time required by lame


## STATE OF MARYLAND

## BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

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 suit of
 next, to answer an action at the
and have you then and there this writ.

City, the
Issued the


No. $\square$ 30 R. D. 192 Baltimore City Court. Change Darker
$v s$.

$\qquad$
$\qquad$
WRIT OF SUMMONS
$\qquad$
Copes of Nor and Notice to plead within to be served on defendant.


Filed FILED MAY 121926


The Daily Record Co., Print, Baltimore Md.

ORANGE PARKER

## VS

FRANK COHEN and DAVID MIELLER


In we?

BALETAOLAS CGN COURM

* $\because+2 \times \% *$

ZRANK COHEN and DAVID LiILLER, Defendants, by aibudy SIIVEABERG, their Attorney, for a Plea to tho Decleration illed in the above entitlea cause say:

That they did not commit the wrongs allomed.

$\qquad$

## In Baltimore City Court. ROOM 134




to testify for the Defendants
Returnable
1927 at 10 o' clock $\mathcal{A} . ~ M . ~_{\text {. }}$


$$
\begin{aligned}
& \text { Panker } \\
& V^{\prime} \\
& \begin{array}{l}
\text { bohew } \\
\text { Eontura }
\end{array}
\end{aligned}
$$

$$
\begin{aligned}
& 20.67
\end{aligned}
$$

