IN THE COURT OF COLLION

PLEAS OF BALTHORS CITY.

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ALICE PROCTOR

VSA...

RUSSELL BRUSS

260 9 Belaid Road

DECLARATION.

DECLARATION.

DECLARATION.

PLEASE FILE.

ATTORNEY ALLAN

ATTORNEY ALLAN

AND PLACE

PARTICULAR COLLID.

DECLARATION.

DECLARATION.

PLEASE FILE.

ATTORNEY ALLAN

ATTORNEY ALLAN

AND PLACE

PARTICULAR COLLID.

DECLARATION.

DECLARATIO

ALICE PROCTOR

IN THE COURT OF COMMON PLEAS

VS.

:

OF

RUSSELL BRUSS

BALTIMORE CITY.

Alice Proctor, plaintiff by Davis and Evans, her attorneys, sues Russell Bruss, defendant.

For that Alice Proctor is the mother and next friend of Bertha Proctor, infant.

For that heretofore, to wit:- on or about the IOth day of June, I925 while Bertha Proctor, infant was lawfully crossing a public highway of Baltimore City at or near to the corner of Dolphin and Division streets, she was run into by an automobile operated by the defendant and as a result thereof she was seriously and permanently injured about the head, limbs and body and was caused to and did suffer great physical pain and mental anguish and was for a long time pervented from performing her usual occupation.

And the plaintiff was for a long time deprived of the services and society of her child, and was forced to and did spend divers sums of money for medical attention and medicine in attempting to cure the said Bertha Proctor, infant of her hurts and wounds occasioned as aforesaid.

And the plaintiff says that her damages were caused by the negligence and want of due care on the part of the defendant and that Bertha Proctor, infant, in no wise contributed thereto.

Wherefore the plaintiff claims \$5,000.00 damages.

Savy Evaus
ATTORNEYS FOR PLAINTIFF.

ALICE PROCTOR

IN THE COURT OF COMMON PLEAS

VS.

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OF

RUSSELL BRUSS

:

BAITIMORE CITY.

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

Davis Tovaus
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 thirty days.

Davis Vovaus
ATTORNEYS FOR PLAINTIFF.

STATE OF MARYLAND

BALTIMORE CITY, to wit:

STORY WILL ST	
J 761 1974	Issued
~ (761 m)	the was of
lge of the Supreme Bench of Baltimore City,	WITNESS, the Honorable JAMES P. GORTER, Chief Jud
•	and have you then and there this writ:
	MENT SOM
	F (1)
next, to answer an action at the suit of	same City, on the second Monday of
	of Baltimore City, to appear before the Court of Common Cle
	come) Soun !!
(P) from	You are hereby commanded to summon
	To the Sheriff of Baltimore City, Greeting:

Attorney. to be served on Defendant. Action, (copy of Nar, and notice to plead WRIT OF SUMMONS 'SA R. D. 192 .oN

THE NI

COURT OF COMMON PLEAS

ALICE PROCTOR

VS

RUSSELL BRUFF

PLEA

Mr. Clerk:

Please file, etc.

Attorneys for Defendant.

Service of copy admitted this Lak day of August, 1925.

Attorneys for Plaintiff.

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NILES, WOLFF, BARTON & MORROW ATTORNEYS AT LAW BALTIMORE, MD.

ALICE PROCTOR

IN THE

vs

COURT OF COMMON PLEAS

RUSSELL BRUFF

000

Russell Bruff, (mentioned in this action as Russell Bruss), the defendant in this cause, by Niles, Wolff, Barton and Morrow, his attorneys, for a plea to the declaration heretofore filed herein, says:

That he did not commit the wrong alleged.

Attorneys for Defendant.