

166 HWB 1293
IN THE BALTIMORE CITY 57

41
13
COURT.

BOX 1303

GEORGETTA PULLEY

VS. *mp*

THE UNITED RAILWAYS &
ELECTRIC COMPANY, a
corporation, and

CHARLES HOBDAV.

322 E. 23rd Street

DECLARATION

Mr. Clerk:-

Please file.

Davis & Evans

ATTORNEYS FOR PLAINTIFF

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

FILED OCT 30 1923

332/5/24

GEORGETTA PULLEY

:

IN THE BALTIMORE CITY

VS.

:

THE UNITED RAILWAYS &
ELECTRIC COMPANY, a
corporation, and
CHARLES HOBDAY

:

COURT.

Georgetta Pulley, plaintiff by her attorneys, Davis and Evans sues the United Railways and Electric Company, a body corporate, and Charles Hobday, defendants.

1. For that on or about the 12th day of July, 1925, the defendant, the United Railways and Electric Company, was a corporation duly incorporated under the Laws of the State of Maryland, and engaged as a public carrier of passengers over the streets of Baltimore City by means of electrically propelled street cars or motor cars. And that the defendant, Charles Hobday was the owner of an automobile.

2. For that whereas the plaintiff, to wit: the 12th day of July, 1925, in Baltimore City, was a passenger on one of the street cars of the defendant, The United Railways and Electric Company, which street car or motor car was then and there being operated along and upon Caroline Street in a southerly direction, the same being under the care, control and management of the then servant, agent or employee of the defendant, The United Railways and Electric Company, its servants, agents or employees.

3. That the then, servants, agents or employees of the defendant, the United Railways and Electric Company, carelessly and negligently ran against the automobile operated by the defendant, Charles Hobday, thereby unseating the plaintiff, throwing her down and against the floor and seats of the car.

4. That while the plaintiff was a passenger on the car as above mentioned, the defendant, Charles Hobday carelessly and negligently ran into and struck against the street car of the defendant, the United Railways and Electric Company, with great force and violence and as a result thereof the plaintiff was unseated and thrown down and against the floor and seats of the said street car.

5. And as a result of the negligence of the above mentioned defendants, the plaintiff was then and there hurt and wounded and she became and was sick, sore, lame and disordered and so remained for a long time; during all of which time she was prevented from performing her usual occupation and was forced to and did spend divers sums of money in attempting to cure herself of her hurts and wounds occasioned as aforesaid.

6. And the plaintiff says that all of her aforesaid injuries and damages were caused by the negligence, carelessness and want of due care on the part of the defendants, or either of them, their servants, agents or employees and that she in no wise contributed thereto.

WHEREFORE the plaintiff claims \$5,000 damages.

Davis Evans

ATTORNEYS FOR PLAINTIFF.

GEORGETTA PULLEY

:

IN THE BALTIMORE CITY

VS.

:

THE UNITED RAILWAYS &
ELECTRIC COMPANY, a
corporation, and
CHARLES HOB DAY

:

COURT.

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 Baltimore City Court, a rule will be entered re-
quiring you to plead to the above declaration within the time re-
quired by law.

Davis T Evans

ATTORNEYS FOR PLAINTIFF.

Mon Est
(Money)

John C. Pote
Sheriff

11 Nov 1925 Renewal to Dec PD for

Mon Est
Money
Charles Hobday
to as Chas Hobday

John C. Pote
Sheriff
for Charles Hobday
John C. Pote
Sheriff

DEC 16 1925 RENEWAL TO JAN R. D. 1926
to Chas Hobday

No. 166 *P 767* 1293
Nov. 57 R. D. 192 5

Baltimore City Court.

Georgetta Pulley

Trial Ref

vs.

The United Railways and Electric
Company of Baltimore
and
Charles Hobday

WRIT OF SUMMONS

with copy

Copy of Nar and Notice to plead
within to be served on defendant.

Davis and Evans
Attorney for Plaintiff

FILED JAN 12 1926

Filed day of 1926 192

2-19



STATE OF MARYLAND

BALTIMORE CITY TO WIT:

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

10/31/25 ⁽²⁾ Edw Early Ass't Pres.

The United Railways and Electric Company of Baltimore, a body corporate
and Charles Hobday

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 November next, to answer an action at the
suit of Georgetta Pulley

and have you then and there this writ.

Witness the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore
City, the 14th. day of September 192 5

Issued the 30th. day of October in the year 192 5

Geo. Carey Lindsay Clerk.

SHERIFF'S RETURN

SUMMONED THE UNITED RAILWAYS AND ELECTRIC COMPANY OF BALTIMORE, A CORPORATION, BY SERVICE ON ^{*Edward Early*} ~~JOHN T. STAUB~~ (TREASURER, AND A COPY OF NAR AND NOTICE TO PLEAD WITH A COPY OF THE PROCESS LEFT WITH SAID TREASURER. *Non est as to Charles Hobday.*

(Audrey.)
Buehler

Rec'd #20

John E. Plee

SHERIFF

ALLOTTMENTS FOR BIRMINGHAM

UNITED STATES

THE DISTRICT OF COLUMBIA
OFFICE OF THE DISTRICT ENGINEER
WASHINGTON, D. C.

ALLOTTMENTS FOR BIRMINGHAM

RECEIVED
GENERAL INVESTIGATION
DIVISION
MAY 10 1913
U. S. DEPARTMENT OF JUSTICE

Serve by
Charles Hobday
322 E 23rd Street

166

1493
57

IN THE BALTIMORE CITY

GEORGETOWN DISTRICT

GEORGETTA PULLEY

:

IN THE BALTIMORE CITY

VS.

:

THE UNITED RAILWAYS &
ELECTRIC COMPANY, a
corporation, and
CHARLES HOBDAV

:

COURT

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

ATTORNEYS FOR PLAINTIFF

TO THE DEFENDANT:

TAKE NOTICE; That on the day of your appearance 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 PLAINTIFF.

GEORGETTA PULLEY

:

IN THE BALTIMORE CITY

VS.

:

THE UNITED RAILWAYS &
ELECTRIC COMPANY, a
corporation, and
CHARLES HOBDDAY

:

COURT

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1. For that on or about the 12th day of July, 1925, the defendant, The United Railways and Electric Company, was a corporation duly incorporated under the laws of the State of Maryland, and engaged as a public carrier of passengers over the streets of Baltimore City by means of electrically propelled street cars or motor cars. And that the defendant, Charles Hobday was the owner of an automobile.

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3. That the then servants, agents or employees of the defendant, the United Railways and Electric Company, carelessly and negligently ran against the automobile operated by the defendant Charles Hobday, thereby unseating the plaintiff, throwing her down and against the floor and seats of the car.

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5. And as a result of the negligence of the abovementioned defendants, the plaintiff was then and there hurt and wounded and she became and was sick, sore, lame and disordered and so remained for a long time; during all of which time she was prevented from performing her usual occupation and was forced to and did spend divers sums of money in attempting to cure herself of her hurts and wounds occasioned as aforesaid.

6. And the plaintiff says that all of her aforesaid injuries and damages were caused by the negligence, carelessness and want of due care on the part of the defendants, or either of them, their servants, agents or employees and that she in no wise contributed thereto.

WHEREFORE the plaintiff claims \$5,000.00 damages.

ATTORNEYS FOR PLAINTIFF.

166 Nov, 1293
57

In the

Baltimore City Court

Georgetta Pulley

vs.

THE UNITED RAILWAYS AND
ELECTRIC COMPANY OF
BALTIMORE et al.

P L E A .

Mr. Clerk:

Please file.

J. Pembroke Shaw

Attorney for Defendant.
The U. R. & E. Co. of Balto.

✓ FILED DEC 3 1925

Georgetta Pulley

VS.

THE UNITED RAILWAYS AND
ELECTRIC COMPANY OF
BALTIMORE,
a corporation., and
Charles Hobday.

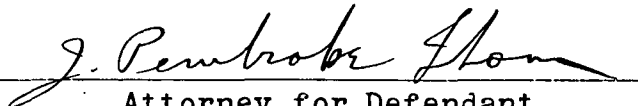
In the

Baltimore City Court

P L E A .

The Defendant, The United Railways and Electric Company
of Baltimore, by J. Pembroke Thom, its attorney, for Plea, says:

That it did not commit the wrongs alleged.



Attorney for Defendant.

The U. R. & E. Co. of Balto.

Pulley
vs
United Royal Club
Co

In Baltimore City Court.

ROOM 134

September Term, 1926

The Sheriff will please summon the following witnesses:

Returnable on Friday the 5th day of November 1926, at 10 o'clock A. M.

446

GEORGETTA PULLEY

IN THE BALTIMORE CITY

To testify

Pulley

vs United

VS.

THE UNITED RAILWAYS & ELECTRIC COMPANY, a corporation, and CHARLES HOBDDAY

COURT.

Mr. Clerk:-

Please issue summons for the following and make the same returnable ~~Wednesday October 13, 1926~~ Friday Nov 5th at 10 A.M.

3 ~~6~~ Georgetta Pulley, 1531 E. Madison St.

19 Roswell Carter NE 209 E. 23rd St.

Davis & Evans
ATTORNEYS FOR PLAINTIFF

Pulley
vs
WRAS Co

In Baltimore City Court.

ROOM 134

September Term, 1926

The Sheriff will please summon the following witnesses:

Returnable on *Friday* the *5th* day of *November* 192*6*, at 10 o'clock A. M.

Form A-139 2-29-25 1M

446

GEORGETTA PULLEY

vs.

The United Railways & Electric Co.
of Baltimore

In the

BALTIMORE CITY COURT

To testify

United Ry & Elec Co vs Georgetta Pulley
for witness

Mr. Clerk,—

Please have summoned the below mentioned witnesses to testify for the defendant in the above entitled case, returnable **Friday, November 5, 1926, at**

- 10 A.M. *3* *sd* William C. Hawkins 622 N Eden Street ✓
- 6* Max Miller *sd* 411 N Broadway
- 3* John C. King *sd* 405 N Caroline Street
- 7* Gregeor A. ~~W~~ *sd* 3510 Elliott Street
- 5* Benjamin G. Berman *sd* 1719 Bank Street ✓
- 2* Harry Chait *sd* 219 S. Caroline Street
2nd floor
- 3* Sarah Bouldin *sd* 1439 E Fayette Street ✓
- 18* Benjamin Smelkinson *sd* 3801 Reisterstown Road
- 4* Martin J. Merz *sd* 1516 N Caroline Street ✓
- 6* G. Wallace Haynie *sd* 1015 N Broadway
- 6* Sewell R. Marsh *sd* 1015 N. Broadway
- 4* John J. Moore *sd* 1620 Lansing Avenue ✓

J. P. Flomy
Attorney for defendant.

Pulley
vs
W. R. & Co

1880

1881

1882

1883

1884

In Baltimore City Court.

ROOM 134

September Term, 1926

The Sheriff will please summon the following witnesses:

Returnable on *Friday* the *5th* day of *November* 1926, at 10 o'clock A. M.

Form A-139 3-29-25 1M

#446

GEORGETTA PULLEY

vs.

The United Railways & Electric Co.
of Baltimore

In the

BALTIMORE CITY COURT

Mr. Clerk,—

Please have summoned the below mentioned witnesses to testify for the defendant in the above entitled case, returnable **Friday, November 5, 1926, at 10 A.M.**

Edward N. Staylor, Justice, Traffic Court,
Fallsway and Lexington Street

AND have him produce the necessary records of the Traffic Court showing the hearing and disposition of the case of Charles Hobday, colored, 323 E. 23rd Street, on July 21, 1925, growing out of an accident occurring on July 12, 1925.

J. P. Honey
Attorney for defendant.