

199 1303
IN THE BALTIMORE CITY 55

COURT.

BOX 1207

CHARLES STATHAM, Infant
by his mother and next
friend EMMA STATHAM

VS.

WILLIAM HEATHRICK

2723 E Monument St

Mr. Clerk: -

Please file.

Davis Evans
ATTORNEYS FOR PLAINTIFF.

FILED AUG 7 1924

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

3/32/24

CHARLES STATHAM, Infant,
by his mother and next
friend, EMMA STATHAM

IN THE

VS.

BALTIMORE CITY COURT:

WILLIAM HEATHRICK

Emma Statham, mother and next friend of Charles Statham, infant, by her attorneys Davis and Evans, sues William Heathrick.

1. For that heretofore, to wit: on or about the 25th day of April, 1924 at Baltimore City, in the State of Maryland, the said Charles Statham was walking along and upon a certain street or highway known as McElderry Street at or near to its intersection with another certain street or highway known as Central Avenue, at their intersection. And the defendant had then and there a certain automobile, which automobile was then and there under the care, control and management of the then servant of the defendant, his servant, agents and employees, who were then driving, propelling or operating the same along said Central Avenue aforesaid, near to and toward the crossing or intersection of said Central Avenue with McElderry Street as aforesaid.

2. And while said Charles Statham, with due care for his own safety, was then and there crossing said Central Avenue at the crossing aforesaid, the defendant, whose duty it was to cause said automobile to approach, pass or turn in McElderry Street at said intersection or crossing there with great care, caution, diligence, did by his servants, then and there, so carelessly and negligently cause said automobile to be driven to and over said intersection or crossing, that said automobile ran into and struck against the said Charles Statham with great force and violence, and thereby the said Charles Statham was thrown down with such

great force and violence unto and against the pavement of said street, that he was then and there hurt and wounded and he became and was sick, sore and lame and disordered and so remained for a long time, to wit: from thence hitherto, during all of which time the said Charles Statham suffered great pain and was hindered from performing his ordinary affairs.

3. And the plaintiff says that the said Charles Statham's injuries and damages were caused by reason of the negligence and carelessness and want of due care on the part of the defendant and not through any negligence on his part contributing directly thereto.

WHEREFORE the plaintiff claims \$10,000.00 damages.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

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

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

TO THE DEFENDANT:

TAKE NOTICE: That on your appearance to this action in The Baltimore City Court, a rule will be entered requiring you to plead to the aforesaid declaration within thirty days thereafter.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

SEP 10 1924 R-NEWFD OCT R D 1924

Summoned and a copy of this and notice to plead left with the defendant,

(McKinley) ~~9/20/24~~ ~~9/20/24~~ ~~9/20/24~~ John E. Pate Sheriff

888 ¹²⁰³ / ₃₃

No. 197 Aug R. D. 192 4

Baltimore City Court.

Charles Statham
Infant

vs.

William Heathrick

2723 E. Hammond St

WRIT OF SUMMONS

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

Harris + Evans

Attorney for Plaintiff

Filed ^{FILED} ~~06/16/1924~~ day of ~~16~~ 192 6. 192

AUG 14 1924

R-NEWFD OCT SEP R D 1924

John E. Pate

John E. Pate Sheriff

John E. Pate Sheriff

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

William Heathrick

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 Aug (inst) next, to answer an action at the suit of

Charles Statham Infant by his mother & next friend Emma Statham

and have you then and there this writ.

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

City, the 12 day of May 1924

Issued the 7 day of Aug in the year 1924

Gerhard J. Gortery Clerk.

IN THE BALTIMORE CITY

344
11

COURT.

55-1203

CHARLES STATHAM, infant
by his mother and next
friend EMMA STATHAM

VS.

WILLIAM HEATHERICK

Order of Satisfaction

*Mr. Clerk,
Please File*

*Davis Evans
atty for Plaintiff*

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

Filed 8th Apr 1925

CHARLES STATHAM, infant
by his mother and next
friend EMMA STATHAM,

:

IN THE

VS.

:

BALTIMORE CITY COURT.

WILLIAM HEATHERICK

:

Mr. Clerk:-

Please enter the above case settled and satisfied
upon payment of costs.

Daves Evans
ATTORNEYS FOR PLAINTIFF.

Walter V. Harrison
Atty. for Deft.