

3/32/5/9

9  
IN THE BALTIMORE CITY

COURT.

MARY TERRY

VS.

JOHN SHIPMAN

2040 E. Baltimore St

BOX 1265

DECLARATION.

Mr. Clerk:-

Please file.

*Davis Evans*  
ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS

ATTORNEY AT LAW

215 SAINT PAUL PLACE

BALTIMORE, MD.

BAUMGARTEN & CO., INC.

MARY TERRY

:

IN THE BALTIMORE CITY

VS.

JOHN SHIPMAN

:

COURT.

Mary Terry, plaintiff by her attorneys, Davis and Evans sues John Shipman, defendant.

For that Mary Terry is the mother of Sam Terry, infant. That on or about the 13th day of September, 1925 the infant son of the plaintiff was struck by an automobile owned and operated by the defendant at or near the intersection of Fremont and Edmondson Avenues, both public highways of Baltimore City. And as a result thereof the said infant was seriously injured and damaged about the body and he became and was sick, sore, lame and disordered and so remained for a long time during all of which time the plaintiff was deprived of the services and society of her son and was caused to and did spend divers sums of money in attempting to cure her son of his hurts and wounds occasioned as aforesaid.

And the plaintiff says that all of her injuries and damages were caused by the negligence, carelessness and want of due care on the part of the defendant and that neither the plaintiff nor her infant son in anywise contributed thereto.

WHEREFORE the plaintiff claims \$5000.00 damages,

Davis & Evans  
ATTORNEYS FOR PLAINTIFF.

MARY TERRY

:

IN THE BALTIMORE CITY

VS.

JOHN SHIPMAN

:

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  
required by law.

*Davis T Evans*  
ATTORNEYS FOR PLAINTIFF.

No. *P 894 3/4* *Jan 19* R. D. 192*6*

# Baltimore City Court.

*Mary Terry*  
vs.

*John Shipman*

## WRIT OF SUMMONS

Cop *7* of Nar and Notice to plead  
within to be served on defendant.

*Davis & Evans*  
Attorney for Plaintiff

Filed **FILED MAR 10 1926** 192*6*  
day of *5*

*John E. as*  
*(Kennedy)*

JAN 13 1926 RENEWAL TO FEB R. D. 1926

*John E. as*

*(Kennedy)*

FEB 10 1926

RENEWAL TO

MAR R. D.

1926

*John E. as*  
*Shorff*

*John E. as*  
*Shorff*

*John E. as*  
*Shorff*

*Ken E. as*  
*(Kennedy)*

WRIT OF SUMMONS

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

John Shepman

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 Jan next, to answer an action at the suit of

Mary Terry

and have you then and there this writ.

Witness the Honorable JAMES P. GORTER, Chief Judge of the Supreme Bench of Baltimore City, the 14 day of Sept 1921

Issued the 14 day of Sept in the year 1921

Geo Carey Lindsay Clerk.

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:

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ATTORNEYS FOR PLAINTIFF.

9  
Serve on John Shipman  
2040 E Baltimore

John Carey Knudsen