

8
2/59
IN THE BALTIMORE CITY

COURT.

MARY TERRY, mother and
next friend of
SAM TERRY

VS.

JOHN SHIPMAN

2040 E Baltimore Street

BOX 1265

DECLARATION

Mr. Clerk:-

Please file.

Davis Evans

ATTORNEYS FOR PLAINTIFF.

J. STEWARD DAVIS
ATTORNEY AT LAW

215 SAINT PAUL PLACE
BALTIMORE, MD.

FILED DEC 14 1925
ENT'D DEC 14 1984

3/32/5/9

MARY TERRY, mother and : IN THE BALTIMORE CITY
next friend of
SAM TERRY, infant

VS.

JOHN SHIPMAN : COURT.

Mary Terry, mother and next friend of Sam Terry, infant,
by Davis and Evans her attorneys, sues John Shipman.

For that heretofore to wit: on or about the 13th day
of September, 1925, Sam Terry, infant was struck by an automobile
owned and operated by the defendant at or near to the intersec-
tion of Fremont Avenue and Edmondson Avenue, both public high-
ways of Baltimore City and as a result thereof he was seriously
injured about the head, limbs and body and he became sick, sore,
lame and disordered and so remained for a long time and was
caused to suffer mental ^{Pain and} anguish and deprived of performing his
usual duties.

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

WHEREFORE the plaintiff claims \$5000.00 damages.

Davis & Evans
ATTORNEYS FOR PLAINTIFF.

MARY TERRY, mother and
next friend of
SAM TERRY, infant

:

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 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 requiring you
to plead to the above declaration within the time required by
law.

Davis Evans
ATTORNEYS FOR PLAINTIFF.

WRIT OF SUMMONS

STATE OF MARYLAND

BALTIMORE CITY, to wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon

John Shipman

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, mother and next friend of Sam Terry, infant

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 Dec in the year 1921

Geo. Carey Ludsay Clerk.

No.

P. 893 1/2
8 Jan 1926

R. D. 1926

Baltimore City Court.

Mary Terry

vs.

John Shipman

2040 E Balto

WRIT OF SUMMONS

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

Davis + Evans

Attorney for Plaintiff

Filed

MAR 10 1926

1926

John E. Est
(Kennedy)

John E. Est
(Kennedy)

John E. Est
(Kennedy)

John E. Est
Sheriff

John E. Est
Sheriff

John E. Est
Sheriff

1926

JAN 10 1926

FEB 10 1926

MAR R. D.

TO

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next friend of
SAM TERRY, infant

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ATTORNEYS FOR PLAINTIFF.

8

$\frac{21}{19}$

Geo. Carey Lindsay

Serve on
John Shipman
2040 E. Baltimore St