

State of Maryland

City of Baltimore Sct. 1921
3rd day of October

HEREBY CERTIFY, That on this day of October 1921 before me, the subscriber, Notary Public, by Letters Patent, under the great Seal of the State of Maryland, commissioned and duly qualified, residing in the City of Baltimore, in the State aforesaid, personally appeared Charles Thomas and Anna Chapman and made oath in due form of law, on the Holy Evangelly of Almighty God, (who being conscientiously scrupulous of taking an oath), did solemnly, sincerely and truly declare and affirm, on the five books of Moses, (he being an Israelite), that there is justly due and owing by Mar Del Mobile Co.

the Defendant in the within named case, to the Plaintiff on annexed (the cause of action in said cause), the sum of 467 -- Four Hundred Sixty Seven dollars and 50 cents, (with interest from) over and above all discounts, to the best of his knowledge and belief.

(NOTE--If the Plaintiff be absent from the State, or if the Plaintiff be a corporation, the following additional oath is necessary.) And he further swears that he is the Agent of the said Plaintiff and duly authorized to make this affidavit, and has personal knowledge of the matters therein stated.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my Seal Notarial, the day and year aforesaid.



Caroline Murray
Notary Public

YOU have been summoned to appear in COURT the second Monday of 1921
Personal attendance in Court on the day named is not required: but, unless within such number of days thereafter as the law limits, legal defense is made to this suit, a Judgment by default may be entered against you.

No. 16
7/1031/51
BOX NO 1166

IN THE
Baltimore City Court.

Charles Thomas

Anna Chapman
Plaintiff

vs.
Mar Del Mobile Co.
Defendant

MR. LINDSAY,
Clerk of Baltimore City Court

Issue in this case, and send copy of the declaration and notice with the writ to be served on the Defendant and make the writ returnable on the second Monday of , 1921

J. Steeple Daw
Attorney for Plaintiff

Filed day of 1921

FILED OCT 10 1921

2/15/21

[NAR. UNDER ACT 1886, CHAP. 184] Oath before a Notary Public.

IN THE BALTIMORE CITY COURT

City of Baltimore, to wit:

Charles Thomas and Anna Chapman

by *J. Steward Davis*

their Attorney sue *Max Del Mobile Company*
(a corporation) proprietors of Packard Motor Co.

For money payable by the Defendant to the Plaintiff

1. For goods bargained and sold by the Plaintiff to the Defendant
2. And for work done and materials provided by the Plaintiff for the Defendant, at his request.
3. And for money lent by the Plaintiff to the Defendant
4. And for money paid by the Plaintiff for the Defendant, at his request.
5. And for money received by the Defendant for the use of the Plaintiff
6. And for money found to be due from the Defendant to the Plaintiff, on accounts stated between them.
7. And for that the Defendant, on the _____ day of _____ 192____
by his promissory note now overdue, promise to pay to the Plaintiff, \$ _____
_____ after date, but did not pay the same.

That the plaintiffs complained to the defendant that the packard was unsatisfactory and was given a cole 8 automobile in exchange subject to some agreement. That the cole 8 proved unsatisfactory and the defendant agreed with the plaintiffs.

8. And for that one _____

on the _____ day of _____ 192____, by his promissory note now overdue, promised to pay the Defendant, or order \$ _____ after date; and the defendant endorsed the same to the Plaintiff, and the said note was duly presented for payment, and was dishonored, whereof the defendant had due notice but did not pay the same.

9. And for that the Plaintiff, on the _____ day of _____ 192____ by his bill of exchange now overdue, directed to the defendant, required the Defendant to pay to the Plaintiff \$ _____ days after date, and the Defendant accepted the said bill but did not pay the same.

And for that the Defendant, on the _____ day of _____ 192____ by his bill of exchange directed to _____ required _____ to pay Plaintiff \$ _____ days after date, and the said bill was duly presented for acceptance, and was dishonored, of which the Defendant had due notice, but did not pay the same.

And the Plaintiff claim \$ *467.50*

J. Steward Davis Attorney for Plaintiff

To the Defendant *Max Del Mobile Co (a corporation) proprietors of Packard Motor Co.*

TAKE NOTICE—That on the day of your appearance to this action in the BALTIMORE CITY COURT, you will be required to plead to said declaration in accordance with the Act of 1886, Chapter 184, or Judgment by default will be entered against you.

J. Steward Davis Plaintiffs Attorney.

Charles Thomas and Anna Chapman
vs.
Max Del Mobile Co

IN THE BALTIMORE CITY COURT.

The Plaintiffs elect to have this case tried before a Jury.

J. Steward Davis Plaintiffs Attorney.

CHARLES THOMAS

AND

ANNA CHAPMAN

VS

MAR DEL MOBILE CO.

.....

RECEIVED BY CHARLES THOMAS AND ANNA CHAPMAN TO MAR DEL
MOBILE COMPANY ON ACCOUNT OF USED CAR-----\$467.50

PER AGREEMENT CAR RETURNED TO MAR DEL MOBILE COMPANY
FOR SALE BY MAR DEL COMPANY AT PRICE OF -----\$850.00

CAR SOLD BY DEFENDANT COMPANY FOR~~4244~~-----\$850.00

DUE CHARLES THOMAS AND ANNA CHAPMAN-----\$382.50



ATTORNEY FOR PLAINTIFF.

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No. 16 Nov. R. D. 192/

Baltimore City Court.

Chas. Thomas

+
Anna Chapman

vs.

Mar. Del Motor Co.
a corporation, &c

WRIT OF SUMMONS

Copy of writ

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

J. Stewart Davis
Attorney for Plaintiff

Filed _____ day of _____ 192

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*John
Earl Williams*

*Summond the Mar Del Motor Company a corporation
by service on Carl Williams the Manager and a
copy of the and notice to plead with a copy of the
Petition left with said Manager also notice of
said summons left at the principal office of
said corporation*

*(Stanley) 11/5/22
Thomas F. M. Smith
Attorneys
Dec 11/22*

STATE OF MARYLAND

BALTIMORE CITY, To wit.

To the Sheriff of Baltimore City, Greeting:

You are commanded to summon *Max Del Mobile Company*
(*a corporation*) proprietor of *Packard Motor Car Co.*

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 *Nov* next, to answer an action at the
suit of

Charles Thomas and Anna Chapman

and have you then and there this writ.

Witness the Honorable *MORRIS A. SOPER*, Chief Judge of the Supreme Bench of Baltimore

City, the *13th* day of *Sep.* 192*1*

Issued the *10th* day of *Oct.* in the year 192*1*

Geo. Carey Lindsey Clerk.

J Stewart Davis
14 E Pleasant St

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No. 16 Nov. RETURN DAY

Baltimore City Court.

*Charles Thomas
et al*

vs.

*Marcel Mobile Co.
etc.*

MR. LINDSAY, Clerk:

File the within pleas, aff't of defense, and certificate of counsel.

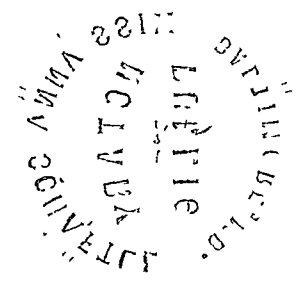
J. Roy Hopkins
Defendant's Attorney.

Service of copy of pleas admitted.

J. Stewart Davis
Plaintiff's Attorney.

Filed day of 19

FILED NOV 10 1921



Charles Thomas and
Anna Chapman

IN THE

Baltimore City Court.

vs.

Harold Mobile Company,
a corporation, proprietor
of Packard Motor Car Co.

Term, 19.....

And the said Harold Mobile Company, a body corporate,
proprietor of Packard Motor Car Co.
the Defendant in this action, by J. P. Roy Hopkins
its attorney, says: For a first plea that it never was indebted as alleged; and for a second
plea says: That it did not promise as alleged

J. P. Roy Hopkins Attorney for Defendant .

STATE OF MARYLAND, City of Baltimore, to wit:

On this 10th day of November, in the year nineteen hundred
and twenty-one before me, the subscriber, a Notary Public Justice of the Peace of the State of Maryland, in
and for Baltimore City, personally appeared Carl Williams, Secretary and
Treasurer of the Harold Mobile Company, a body corporate, owner of Packard Motor Car Company
(one of) the above-named Defendant and made (affirmation)
oath in due form of law, that for and on behalf of said defendant every plea so pleaded by the Defendant is true, and h
admits no part of the Plaintiff's claim to be due and owing, and
all is disputed; and further that he the affiant verily believes
the Defendant will be able at the trial of the cause, to produce sufficient evidence to support the said
pleas (as to the portion disputed) and that he is advised by counsel to file the said pleas.

Anna Schaffel
Notary Public

I HEREBY CERTIFY, that I advise the defendant in making the above
oath, (affirmation) and filing said pleas to do the same.

J. P. Roy Hopkins Attorney for Defendant .

And the Defendant elects to have this case tried before a Jury.

Defendant Attorney.

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Order for Appearance.

FILED JAN 30 1924

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Charles Thomas and

Anna Chapman

VS.

Mar. Del Mobile Co.

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Baltimore City Court.

No. _____ Return Day 192

MR. CLERK: Enter *my* appearance for the
plaintiffs in this case.

Sam S. Haggis Attorney.

Filed _____ 192

FILED JAN 30 1924

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IN THE
BALTIMORE CITY COURT.

CHARLES THOMAS and
ANNA CHAPMAN

VS.

MAR DEL MOBILE COMPANY,
a body corporate.

Mr. Clerk:-

Please file.

J. Steward Davis
ATTORNEY FOR PLAINTIFFS.

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

Filed 29th Sept 1924

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Please
file on by in by the firm
for use of Mr. J. S. D.*

CHARLES THOMAS and

:

IN THE

ANNA CHAPMAN

VS.

:

MAR DEL MOBILE COMPANY, a
body corporate.

:

BALTIMORE CITY COURT.

Charles Thomas and Anna Chapman by their Attorneys,
Davis and Evans, say that they filed in this Honorable Court a
suit against the Mar Del Mobile Company, a corporation.

That the plaintiffs desire to amend the declaration by
interlineation and pray leave of Court to so amend the first

paragraph. *By inserting the words "in lieu of" that the plaintiffs com-
plained to defendant that the packard was unsatisfactory and was
given a cole automobile in exchange subject to same agreement.*

*That the cole proved unsatisfactory
and the defendant agreed with the
plaintiffs-*

J. Stewart Davis
ATTORNEYS FOR PLAINTIFFS.

Ordered by the Baltimore City Court this 29th day of
1924 that the declaration may be amended as prayed.

Chas. Heister

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Thomas

no

Marcel
Muller

deft
Jury panel

2nd—3 Weeks September Term, 1924

(Beginning Monday, September 29, 1924)

Docket..... 1971

Page..... 1031

BALTIMORE CITY COURT

Charles Thomas and
Anna Chapman

Man Del Mobile Company (a Corporation)
Proprietor of Packard Motor Car Co.

Jury Sworn Sept 29th 1924.

1 Charles J. Hettinger Foreman.

CHARLES J. HETTINGER, Foreman
Brushmaker, Wm. A. Tottle & Co.,
1919 W. Lombard.

~~JOHN F. PEACH, Supervisor of Statistics & Expenses, B. & O.
R. R. Co., 3302 Clifton Ave.~~

~~ELMER RUSSELL, Clerk, The Annapolis & Chesapeake Rwy.
Power Co., Athol Heights.~~

2 HERMAN KRABBE, Dispatcher, Un. Ry. & Elec. Co.,
1712 E. Norwood Ave.

3 J. THOMAS SHOCK, Retired, 514 E. 35th.

4 LOUIS P. HERPEL, Retired, 117 N. Linwood Ave.

~~ADAM A. SEUFERT, Outside Sup't., Elite Laundry Co.,
541 N. Kenwood Ave.~~

~~THOMAS E. CONLON, Supervisor Freight Suits, B. & O. R. R.,
3914 Woodbine Ave.~~

~~ROLAND W. SIEGMUND, Cabinet Maker, F. X. Ganter Co.,
4006 W. Franklin.~~

~~W. EMORY COLE, Salesman, A. Schauman & Son,
2130 E. Federal.~~

~~CALVIN L. HORN, Sup't., Md. Color Prtg. Co.,
406 Hollen Road, Cedarcroft.~~

5 ARTHUR SHANEY, Woodworker, Reliable Furniture Co.,
7 S. Robinson.

6 DANIEL M. DOUDIEN, Electrician, 1618 Darley Ave.

~~ALBERT BECKMAN, Florist, Hamilton Ave., Raspe.~~

7 HENRY S. EARP, Agt., Balto. Life Ins. Co., 3305 Carlisle Ave.

8 C. EDWARD GILLASPEY, Asst. Buyer, American Whol. Corp.,
3700 Gwynn Oak Ave.

~~EDMUND T. JONES, Builder, 3610 Fairview Ave.~~

9 CHAS. F. COLE, Grocer, 226 Harford Road.

10 GEORGE PFAFF, Retired, 502 E. 28th.

~~THOMAS C. JOYCE, Salesman, 3404 W. North Ave.~~

~~GEO. A. WOLF, Pressman, John S. Bridges & Co.,
1401 Linden Ave.~~

11 EDWARD L. HARP, Clerk, Balto. Copper Works,
1827 E. Lafayette Ave.

~~GEO. N. HOFFMAN, Foreman, Un. Ry. & Elec. Co.,
114 Evergreen Ave.~~

17 CHAS. E. BAKER, Floorlayer, Austin & Co, 610 N. East Ave.

~~DAVID E. BISHOP, Butcher, 1215 Rutland Ave.~~

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Thomas

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Marcel

Mobile

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Gary Paul

2nd—3 Weeks September Term, 1924

(Beginning Monday, September 29, 1924)

Docket 1921

Page 1031

BALTIMORE CITY COURT

Charles Thomas and Anna Chapman

Mar Del Mobile Company (a Corporation) proprietor of Packard Motor Car Co

Jury Sworn Sept 29th 1924

1 Charles J. Hettinger Foreman

CHARLES J. HETTINGER, Brushmaker, Wm. A. Tottle & Co., 1919 W. Lombard.

~~JOHN F. PEACH, Supervisor of Statistics & Expenses, B. & O. R. R. Co., 3302 Clifton Ave~~

~~ELMER RUSSELL, Clerk, The Annapolis & Chesapeake Rwy. Power Co., Athol Heights.~~

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~~THOMAS E. CONLON, Supervisor Freight Suits, B. & O. R. R., 3014 Woodbine Ave.~~

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~~GEO. A. WOLF, Pressman, John S. Bridges & Co., 1401 Linden Ave.~~

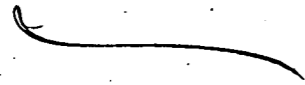
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12 CHAS. E. BAKER, Floorlayer, Austin & Co, 610 N. East Ave.

~~DAVID E. BISHOP, Butcher, 1215 Rutland Ave.~~

Thomas
Messrs. Del. Mobile Co.



71

In Baltimore City Court.

ROOM 134

September Term, 1924

The Sheriff will please summon the following witnesses:

Returnable on *Wednesday* the *24th* day of *September*
192*4*, at 10 o'clock A. M.

CHARLES THOMAS and	:	IN THE
ANNA CHAPMAN	:	
VS.	:	
MAR DEL MOBILE COMPANY, etc.	:	BALTIMORE CITY COURT

Mr. Clerk

Please issue for

- 5* Mr. B. F. Baker *BT* 325 S. Ellwood Ave. Baltimore
- 20* Mr. George W. Nickum *SD* 2940 Harford Ave. "
- 3* Mr. Joseph Nechanin *sd* Fallsway & Guilford Ave. or 104 N. Front St. "

to testify for the defendant in the above entitled case and make your writ returnable to September *24th*, 1924, at 10 A.M.

J. L. Roy Hopkins
Attorney for Defendant

E

my
Thomas

VS

Near Del Mobile Mo

In Baltimore City Court.

ROOM 134

September

Term, 1924

The Sheriff will please summon the following witnesses:

Returnable on Monday the 29th day of September
1924, at 10 o'clock A. M.

CHARLES THOMAS and
ANNA CHAPMAN

IN THE

VS.

MAR DEL MOBILE COMPANY, etc.

BALTIMORE CITY COURT

Mr. Clerk:

Please issue for

4-18 Mr. Joseph Nechamkin *JN*

West side of Guilford Ave.
next door to Engine House
below Mt. Royal or
2700 Ulman Ave.

Baltimore

to testify for the defendant in the above entitled case and make
your writ returnable on September 29th, 1924, at 10 A.M.

J. L. Cross
Attorney for Defendant

W. E.
Thomas
vs.
Mar Del Mobile Co

In Baltimore City Court.

ROOM 134

September Term, 1924

The Sheriff will please summon the following witnesses:

Returnable on Monday the 29th day of September
1924, at 10 o'clock A. M.

CHARLES THOMAS and
ANNA CHAPMAN

VS.

MAR DEL MOBILE COMPANY ,etc.

:
:
:
:
:

IN THE

Geo. Casey Lindeman
Clerk of Baltimore City Court.

BALTIMORE CITY COURT

.....

Mr. Clerk:

Please issue for and secure personal service on

Mr. B. F. Baker *sd* 325 S. Ellwood Ave. Baltimore

to testify for the defendant in the above entitled case and make
your writ returnable to September 29th, 1924, at 10 A.M.

J. L. Roy Hopkins
Attorney for Defendant