

CASE NO. 90215022

Part _____ of _____ Parts

In The Circuit Court for Baltimore City

CIVIL

In the Matter of

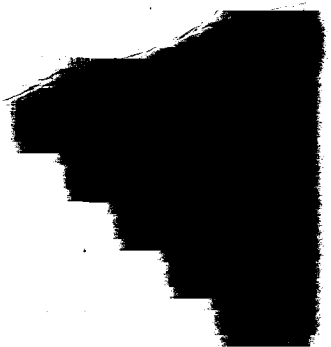
BETTY LANGREHR

VS

EPHRATH HOBBS

112523

C L



x



BETTY LANGREHR	*	IN THE
Appellant	*	CIRCUIT COURT
v.	*	FOR
EPHRAIM HOBBS	*	BALTIMORE CITY
Appellee	*	Case No: 92015022/CL117523
* * * * *	*	* * * * *

5

MEMORANDUM OPINION AND ORDER

Hollander, J.

Betty Langrehr ("Langrehr" or "Appellant") filed suit in the District Court for Baltimore City against Ephraim Hobbs ("Hobbs" or "Appellee"). Langrehr alleged that Hobbs negligently caused an automobile accident, and claimed that as a result, she was injured. Langrehr sought damages in the amount of \$10,000.

On May 2, 1990, the matter was tried before the Honorable Andre M. Davis, then sitting in the District Court. Oral testimony and documentary evidence was presented by both parties, and at the conclusion of the trial Judge Davis entered judgment for Hobbs. T.114. Langrehr filed the instant appeal, and the parties submitted briefs to this court, waiving oral argument.

Scope of Review

This is an appeal on the record. See Md. Code Ann., Cts. and Jud. Proc. Art., Sec. 12-401(d). In appeals taken on the record from the District Court, Md. Rule 1386 provides that the appellate court shall:

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review the case upon both the law and the evidence, but the judgment of the lower court will not be set aside on the evidence unless clearly erroneous and due regard will be given to the opportunity of the lower court to judge the credibility of the witnesses.

As Rule 1386 makes clear, this court, functioning as an appellate or reviewing court, may reverse the decision of the lower court as to factual determinations only if, on the record, it appears that the trial court's determination was clearly erroneous. Ryan v. Thurston, 276 Md. 390, 392 (1975). Moreover, it is incumbent upon this court, in its appellate capacity, to consider the evidence produced at trial in the light most favorable to the prevailing party, i.e., Hobbs. If substantial evidence was presented to support the trial court's decision, it cannot be deemed clearly erroneous, and must not be disturbed on appeal. Id. As the trial court is the judge of the weight of the evidence, the appellate court may not substitute its judgment for that of the trial court. Id.

With respect to questions of law, the reviewing court must, of course, decide whether legal questions were properly resolved. Thus, where the determination is one involving a conclusion of law, the clearly erroneous standard does not apply. "The lower court's interpretations of law enjoy no presumption of correctness on review: the appellate court must apply the law as it understands it to be." Rohrbaugh v. Estate of Stern, 305 Md. 443, 447 (1986).

Issues Presented

Appellant presents two issues on this appeal:

1. Did the trial judge err in not finding a causal connection between Appellant's injuries and the accident?

2. Did the trial judge err in not entering judgment for the Appellant when he found that Appellee caused the accident, but no damages were sustained by Appellant.

The trial court correctly applied the law, and its factual determinations were not clearly erroneous. The trial court considered the facts and circumstances surrounding the events, and it was for the trial court to weigh the evidence and assess the credibility of the witnesses. This court cannot substitute its judgment on appeal regarding credibility or the weight of the evidence.

Discussion

I.

Appellant asserts that Judge Davis abused his discretion in not finding a causal connection between the alleged injuries and the accident. Proximate causation is a factual determination made by the trier of fact. As the Court in Jubb v. Ford, 221 Md. 507, 513 (1960), remarked:

Determination of proximate cause is not a scientific process or one guided by legal abstractions, and whether it exists is to be decided in a common sense fashion in light of attending facts and circumstances, and unless facts are undisputed and admit of but one inference, the question is for the jury.

Evidence was adduced that Appellant was involved in three separate accidents, one before and one after the accident involving Hobbs. Langrehr testified that directly following the accident with Hobbs, she felt "all shook up" T.12 and that when she returned home she had pain in her back and neck. She stated that approximately an hour and a half after the accident, she went to the hospital. T.12. Langrehr further testified that after the accident she suffered from headaches T.12,14, and required a course of physical therapy T.15. Although the parties stipulated to the authenticity of Langrehr's medical records (T.4), no expert medical testimony was offered to prove that her injuries were proximately caused by the accident with Appellee.¹

The trial court heard testimony regarding the very minor nature of the impact involved in the accident. Photographs of the eight year old automobile in which Langrehr was a passenger revealed very minor property damage. The court also received in evidence an estimate of repairs for damage to the vehicle, which the court could not conclude was actually caused by the accident. T.98,99.

Judge Davis, sitting as the trier of fact, was not convinced by the evidence that the injuries were proximately caused by the accident. He stated:

I cannot accept Mrs. [sic] Langrehr's testimony, as bolstered by the medical reports, that these medicals proximately were caused by this accident. This was a kiss. Mrs. Langrehr was already injured. Maybe she overreacted. Of course, the

1. Langrehr's medical reports were introduced, but they do not contain opinions regarding causal connection between the accident and the injuries allegedly sustained.

Defendant takes the Plaintiff as he finds her, but I simply cannot accept, as a - as a common sense point of view, that she could have had headaches and neck pain proximately caused by this contact. I simply can't accept that.

Maryland law is clear that the trial court, as trier of fact, is not only the judge of a witness' credibility, but is also the judge of the weight to attach to the evidence. Knowles v. Binford, 268 Md. 2 (1973); Real Estate Central, Inc. v. Kramer, 254 Md. 290 (1969). In light of the facts and circumstances surrounding the nature of the accident, the court's decision rested on its consideration of the credibility of the witnesses and the weight of the evidence. The trial court clearly did not believe Langrehr's testimony that the injuries she complained of were the result of an accident in which there was negligible impact and virtually no property damage.² Expert medical testimony is not always necessary to establish the requisite causal connection between the accident and injury. Vroom v. Arundel Gas Co., 262 Md. 657 (1971). However, where, as here, a case presents a legitimate medical question of causation in light of preexisting or multiple injuries, expert testimony may be required.

II.

Appellant's second assertion of error is also without merit. The basic elements of a cause of action sounding in negligence are:

2. The only evidence of property damage was a photograph of the eight year old vehicle about which Judge Davis remarked: "I just don't see any damage here." (T. at 92), and an estimate for repairs to the vehicle totalling \$286.30.

1. A duty, or obligation, recognized by the law, requiring the person to conform to a certain standard of conduct, for the protection of others against unreasonable risks.
2. A failure on the person's part to conform to the standard required: a breach of duty....
3. A reasonably close causal connection between the conduct and the resulting injury....
4. Actual loss or damage resulting to the interest of another.

B.N. v. K.K., 312 Md. 135 (1988); Peroti v. Williams, 258 Md. 663 (1970). In Peroti, the Court of Appeals delineated the distinction between liability and negligence:

Liability is an obligation to pay, and arises only when all essential elements of an action are established. (Emphasis added).

Id. at 669.

It is clear, then, that damage (or injury) is an essential element of actionable negligence. When there is a finding that one or more of the elements is missing, the cause of action necessarily fails. MacCubbin v. Wallace, 42 Md. App. 325, 328 (1979). Judge Davis found that Langrehr had not suffered any damages as a result of the accident, and therefore he appropriately entered judgment for the Hobbs. T.115. Langrehr's assertion that nominal damages should have been awarded, despite the trial court's finding, is misplaced. Nominal damages to vindicate a technical right cannot be recovered in a negligence action where no actual loss has occurred. Prosser, Keeton, The Law on Torts, 5th Ed. Sec. 30, Rest. 2d. Torts, Sec. 907 comment (a).

Therefore, it is this 11^m day of January, 1991, by the
Circuit Court for Baltimore City, ORDERED that the judgment of
the District Court be AFFIRMED. Costs to be paid by Appellant.

Ellen Hollander

Ellen L. Hollander, Judge

cc: Daniel W. Cagan, Esquire
Attorney for Appellant
David B. Ginsung, Esquire
Attorney for Appellee

FILED

J. Hollander

JUN 2 1991

BETTY LANGREHR

CIRCUIT COURT FOR
BALTIMORE CITY

* IN THE

Plaintiff/Appellant

* CIRCUIT COURT

vs.

* FOR

EPHRAIM HOBBS

* BALTIMORE CITY

Defendant/Appellee

* Case No. 90215022/CL117523

* * * * *

MEMORANDUM OF DEFENDANT/APPELLEE, EPHRAIM HOBBS

I. ISSUE

Whether it was clearly erroneous for the trial court to find in favor of the Defendant/Appellee, Ephraim Hobbs, since there was substantial evidence for the Court to find that the complaints of injury alleged by the Plaintiff were not proximately caused by this incident.

II. STATEMENT OF LAW

On May 2, 1990, the District Court Trial of this action took place before the Honorable Andre M. Davis, who found that the complaints of injury alleged by the Plaintiff were not proximately caused by this incident and entered a judgment in favor of the Defendant, Ephraim Hobbs.

The Rule of Law on proximate cause is neatly stated in the Maryland Civil Pattern Jury Instructions which says "To recover, the negligence must be a cause of an injury." MCPJI 19:8.

This means that negligence is not actionable unless it is the proximate cause of the Plaintiff's injuries. Medina v. Meilhammer, 62 Md. App. 239, 489 A.2d, 35, cert. denied (1985) Liability and negligence exist only if the breach of duty is the

proximate cause of the damages. Kramer v. Housing Opportunities Comm'm., 304 Md. 705, 501 A.2d, 35 (1985)

The standard for review that this Court must implement to decide on the record of the lower Court is set forth in Maryland Rule of Civil Procedure 1386 which states:

Review Upon the Law and the Evidence. In the appeals to be decided on the record of the lower court, the appellate court will review the case upon both the law and the evidence, but the judgment of the lower court will not be set aside on the evidence unless **clearly erroneous** and due regard will be given to the opportunity of the lower court to judge the credibility of the witnesses. (emphasis added)

The long standing rule in Maryland is that the Appellant Court cannot substitute its judgment for that of the trial court on findings of fact, and witnesses credibility. Only if there exists no rational basis to support the trial court's determination can the judgment of the lower Court be set aside. Kowell Ford, Inc. v. Doolan, 283 Md. 579, 391 A.2d. 840 (1978).

The evidence and testimony produced at trial must be considered in a light most favorable to the prevailing party, Ephraim Hobbs. Ryan v. Thurston, 276 Md. 390, 347 A.2d 834 (1975). Furthermore, this Court cannot disturb the ruling of the trial court when substantial evidence had been presented in support of its findings. Id.

Therefore, Plaintiff/Appellant has the burden on appeal of proving that there was no substantial evidence to support the findings of fact and application of law, and that the determination of the trial court was clearly erroneous.

III. APPLICATION OF LAW AND FACTS

The basis for this action are complaints of injury by the Plaintiff allegedly resulting from a motor vehicle accident.

The trial court originally found in favor of the Plaintiff against the Defendant and erroneously awarded a judgment for property damage only. (Record, Page 111, Line 10-12) However, realizing that there was no claim for property damage, the Court promptly revised its ruling and found in favor of the Defendant against the Plaintiff. (Record, Page 114, Line 8-9)

Appellant contends that merely because there were medical records and billing statements introduced by stipulation of counsel, Plaintiff must have been injured in this occurrence. However, Plaintiff failed to prove to the Trial Court that Plaintiff's complaints were proximately caused by this occurrence. (Record, Page 115, Line 3-4)

This was a minor accident that even Plaintiff's counsel admitted was of "no major impact." (Record, Page 91, Line 15-17) Photographs of Plaintiff's vehicle which clearly depicted no visible damage were introduced into evidence. (Record, Page 37, Line 12-18) While under oath, Plaintiff admitted that she had three (3) major accidents within a period of two (2) months and could not recall what complaints she had at what time. (Record, Page 32, Line 17 through Page 33, Line 13) At the time of this occurrence the Plaintiff was undergoing physical therapy (Record, Page 21, Line 1-5) and receiving treatment from an orthopedic surgeon for injuries from a previous accident. (Record, Page 23, Line 8-12)

Based upon all of the testimonial evidence and documentary


evidence, the Court found that the Plaintiff's complaints were not proximately caused by this incident. (Record, Page 96, Line 13-17) Judge Davis went on to say:

... I cannot accept Mrs. (sic) Langrehr's testimony, as bolstered by the medical reports, that these medicals proximately were caused by this accident.

This was a kiss. Mrs. Langrehr was already injured. Maybe she overreacted. Of course, the Defendant takes the Plaintiff as he finds her, but I simply cannot accept, as a - as a common sense point of view, that she could have had headaches and neck pain proximately caused by this contact. I simply can't accept that.

IV. CONCLUSION


Therefore, it was not clearly erroneous for the trial court to find in favor of the Defendant, Ephraim Hobbs, since there was substantial, documentary and testimonial evidence, for the Court to find that the complaints of injury alleged by the Plaintiff were not proximately caused by this incident.



DAVID B. GINSBURG
Attorney for Defendant/Appellee
6708 Alexander Bell Drive
Columbia, Maryland 21046
1(800) 451-1464

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, That on this 31st day of December, 1990, a copy of the foregoing Memorandum, was mailed, postage prepaid, to Daniel W. Cagan, Esquire, 1 East Lexington Street, #201, Baltimore, Maryland 21202, Attorney for Plaintiff/Appellant.



DAVID B. GINSBURG

ADMITTED: MD, DC

DAVID B. GINSBURG

ATTORNEY AT LAW

JAN 02 1991

PHONE: 1-800-451-1464

(301) 290-2004

6708 ALEXANDER BELL DRIVE
COLUMBIA, MARYLAND 21046

December 31, 1990

Clerk of the Circuit Court for
Baltimore City
111 N Calvert Street
Baltimore, Maryland 21202

Re: Langrehr vs. Hobbs
Case No: 90215022/CL117523

Dear Madam Clerk:

Enclosed please find Defendant/Appellee's Memorandum regarding the above captioned case.

Your cooperation and assistance in filing same among the Court documents is appreciated.

Very truly yours,

DS

David B. Ginsburg

DBG/day

Enclosure

✓ cc: Judge Ellen L. Hollander
Daniel W. Cagan, Esquire

JAN 02 1991

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BETTY LANGREHR

* IN THE

Plaintiff/Appellant

* CIRCUIT COURT

vs.

* FOR

EPHRAIM HOBBS

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Defendant/Appellee

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151
DAVID B. GINSBURG
Attorney for Defendant/Appellee
6708 Alexander Bell Drive
Columbia, Maryland 21046
1(800) 451-1464

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151
DAVID B. GINSBURG

W7/day



DISTRICT COURT OF MARYLAND FOR.....

City/County *29217-89*

Located at.....

Case No. *Ephraim Hobbs*

Betty Langrehr
Plaintiff

Ephraim Hobbs
Defendant

Address.....

Address.....

VS.

Telephone.....

Telephone.....

Contained herein are exhibits in the above entitled case.

Plaintiff:

Exhibit 1.....

Exhibit 2.....

Exhibit 3.....

Exhibit 4.....

Exhibit 5.....

Exhibit 6.....

Exhibit 7.....

Defendant:

Exhibit 1.....

Exhibit 2.....

Exhibit 3.....

Exhibit 4.....

Exhibit 5.....

Exhibit 6.....

Exhibit 7.....

BETTY LANGREHR

Dr. Propper	\$	300.00
Dr. Young		250.00
Physical Therapy Assocs.		455.00
Dr. Angell & Assocs.		36.00
South Baltimore General		85.44
Hanover Emergency		110.00
Harbor Radiologists		28.00
	\$	<u>1,264.44</u>

PROPERTY DAMAGE.....\$ 286.30

DISTRICT COURT FOR MARYLAND
PLAINTIFF'S EXHIBIT
NO. 1

DOB-1-27-55

STATEMENT

COHEN & BLUMBERG, M.D., P.A.

Daniel Cagan
5 Light Street
Balto, Md. 21202

MICHAEL S. PROPPER, M.D.

Patriots Plaza Office Bldg.
8055 Ritchie Hwy. Pasadena, Md. 21122
Telephone 760-3777

PRACTICE LIMITED TO
ORTHOPEDIC SURGERY
PT

Langrehr, Betty
1640 S, Hanover St
Baltimore, Maryland 21230

~~MD/A 9-16-86~~

BALANCE FORWARD

DATE	DETAIL	CHARGE	CREDIT	BALANCE
ESQ 9-18-86	OC	150 -		150 -
ESQ 10-9-86	F	75 -		225 -
ESQ 10-16-86	F	75 -		300 -
ESQ 12-1-86			140 -	160 -
2-4-87 Billed and PLEASE ADVISE OF STATUS				

PLEASE PAY LAST AMOUNT IN BALANCE COLUMN

- X - X-Ray
- OC - Office Consultation
- HC - Hospital Consultation
- F - Follow Up Visit
- MR - Medical Report
- ADJ - Fee Adjustment
- NC - No Charge
- S - Surgery
- CA - Cast Application
- MS - Medical Supplies
- PT - Physical Therapy
- FT - Fracture Treatment
- IT - Injury Treatment
- BS - Blue Shield Payment
- IP - Insurance Co. Payment
- CP - Cash Payment
- CI - Cortisone Injection
- IV - Initial Visit

DISTRICT COURT FOR BALTIMORE COUNTY
PLAINTIFF'S EXHIBIT

NO. 2

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:

EDWARD R. COHEN M.D.

LAWRENCE BLUMBERG M.D.

GARY W. PUSHKIN M.D.

MICHAEL S. PROPPER M.D.

CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:

HENRY A. YOUNG M.D.

reply to:

WNTOWN	<input type="checkbox"/>	2506 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
TIMORE JNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
EN BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Re: Betty Langrehr
S.S.#: 213-62-7471
D/A: September 16, 1986

FOR PROFESSIONAL SERVICES

Orthopedic evaluation
on 9-18-86

\$150.00

Fees for physical therapy are submitted separately.

Michael S. Propper, M. D.

MSP:esp

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:

EDWARD R. COHEN M.D.

LAWRENCE BLUMBERG M.D.

GARY W. PUSHKIN M.D.

MICHAEL S. PROPPER M.D.

CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:

HENRY A. YOUNG M.D.

reply to:

WNTOWN	<input type="checkbox"/>	2506 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
BALTIMORE COUNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
ELLEN BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Re: Betty Langrehr

S.S.#: 213-62-7471

D/A: September 16, 1986

ORTHOPEDIC SURGEON'S REPORT:

Ms. Langrehr is seen today in orthopedic examination for injuries sustained in an automobile accident on the above date. The patient describes the impact as severe. She noted the slow onset of neck pain and stiffness that are non-radiating in nature. She states her neck aches continuously.

PAST MEDICAL HISTORY: Non-contributory.

PHYSICAL EXAMINATION:

Inspection of the cervical spine reveals no visible deformity. Both trapezius muscles are tender to deep palpation. Left-sided trapezial muscle spasm is palpated. Range of motion in the cervical spine is limited twenty (20%) percent in all planes. Compression of the cervical spine produces discomfort, but no neurological symptoms. Disc traction of the cervical spine provides mild symptomatic relief. Adson's test and Tinel's test are negative. Neurocirculatory examination is intact.

X-RAY EXAMINATION:

No x-rays were taken today. Reports from South Baltimore General Hospital, where the patient was initially treated, were obtained.

IMPRESSION:

Musculoligamentous sprain-strain of the cervical spine, post-traumatic.

Re: Betty Langrehr

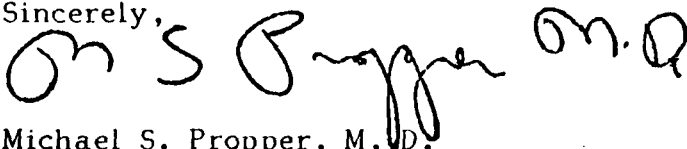
-2-

September 18, 1986

RECOMMENDATIONS:

I have placed the patient out of work at this time. She is to receive physical therapy to her cervical spine over the next two weeks and take an oral anti-inflammatory medication, Indocin, 25 mg., one three times daily. Follow-up is scheduled in two weeks.

Sincerely,

A handwritten signature in cursive script that reads "Michael S. Propper M.D." The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Michael S. Propper, M.D.

MSP:esp

COHEN & BLUMBERG, M.D., P.A.

LAWRENCE BLUMBERG, M.D. DEA NO AB-5388966 EDWARD R. COHEN, M.D. DEA NO AC-2561224
MICHAEL S. PROPPER, M.D. DEA NO AP 2689276 GARY W. PUSHKIN, M.D. DEA NO AP 9074838
PRACTICE LIMITED TO ORTHOPEDIC SURGERY
2506 ST. PAUL ST. BALTO., MD 21218 735-3300
9101 FRANKLIN SQUARE DRIVE BALTO., MD 21237 574-9300

NAME Betty Langrehr AGE 61

ADDRESS Indoory... Street DATE 9/18

R 10 po Tix 2 weeks

~~38.83~~

(9/24)
refill

REFILL 0 1 2 3 4 PRN

LABEL

MD

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY
LAWRENCE BLUMBERG M.D. DEA NO. AB 5388966 EDWARD R. COHEN M.D. DEA NO. BC 0477174
MICHAEL S. PROPPER M.D. DEA NO. AP 2689276 GARY W. PUSHKIN M.D. DEA NO. AP 9074838

CONSTANTINE A. MISOUL M.D. DEA NO. AM 3090165

PRACTICE LIMITED TO NEUROSURGERY
HENRY A. YOUNG M.D. DEA NO. AY 2310871

\$36.00

2506 SAINT PAUL STREET BALTIMORE, MD 21218 735-3300
9101 FRANKLIN SQ. DRIVE BALTIMORE, MD 21237 574-9300
8055 RITCHIE HIGHWAY PASADENA, MD 21122 760-3777

NAME Langrehr, Betty DATE 9/18

R Flexeril 10 mg #50
1 tab p.o. qhs

REFILL 0 1 2 3 4 PRN

LABEL

MD

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY
LAWRENCE BLUMBERG M.D. DEA NO. AB 5388966 EDWARD R. COHEN M.D. DEA NO. BC 0477174
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CONSTANTINE A. MISOUL M.D. DEA NO. AM 3090165

PRACTICE LIMITED TO NEUROSURGERY
HENRY A. YOUNG M.D. DEA NO. AY 2310871

~~38.83~~
38.83

2506 SAINT PAUL STREET BALTIMORE, MD 21218 735-3300
9101 FRANKLIN SQ. DRIVE BALTIMORE, MD 21237 574-9300
8055 RITCHIE HIGHWAY PASADENA, MD 21122 760-3777

NAME Langrehr, Betty DATE 2/18

R Equaneric #100
2 tabs po qhs for
headache

REFILL 0 1 2 3 4 PRN

MD

SOUTH BALTIMORE GENERAL HOSPITAL/3001 S. HANOVER ST./BALTIMORE, MD. 21230/301-347-3200

14

HOSPITAL I.D.#: 52-049-1660

PATIENT NAME		RESPONSIBLE PARTY		H	PATIENT PHONE		DISCHARGED	DATE STAY	PAGE	
TTY L LANGREHR		LOUIS C WOOD			301-528-9197		9/16/86	9/16/86	1 OF 1	
MEDICAL RECORDS NUMBER	PATIENT STREET ADDRESS		PATIENT CITY		ST	ZIP CODE	PATIENT ACCT. NUMBER	PATIENT BIRTHDATE	SEX	DISCHARGE STATUS
04558	1640 S. HANOVER ST		BALTIMORE		MD	21230	060451971	1/27/55	F	
PATIENT TYPE		MEDICAL SERVICE TYPE		DOCTOR #	DOCTOR'S NAME		BAL FWD DATE	TOTAL CHARGES	TOTAL PAYMENTS	DUE FROM PATIENT
4					SOUTH BALTIMORE GENE					

VOICE # 060451971

DATE	POSTING ACCOUNT NUMBER	TICKET NUMBER	REVENUE DESCRIPTION	UNIT CHARGE	UNITS	AMOUNT	PATIENT LIABILITY
1686	00100008		EMERGENCY ROOM SERVICES		1	51.00	
1686	00120408		CERVICAL SPN AP LAT & UD		1	33.19	
1686	01354191		VALIUM TAB 5 MG UD		1	1.25	
*** CURRENT BALANCE:					3	85.44	

1903 Red: Weygan
Cecily
MVA - Mrs P.M.
to ER

W.F.
initially no pain but
later neck
became very stiff
not of disengagement in
3 NW 3 Loc.

1) C-spine x-ray 1903
2) soft collar / Dic.

Victim 5' 10" tall
1903
Husband left to live home 10/67

ES: 2 (2) - 1/2 disloc
Impression or diagnosis: Cervical Strain

CONDITION OF DISCHARGE 1 - Stable 2 - Unchanged
Check One 3 - Admitted
Discharge instruction: Home
1) Ibuprofen 600 #20
2) Robaxon 750 #4
3) Soft collar + pillow
4) F.A. salt
Patient's signature: Betty Langrehr

ADMITTED YES NO
ROOM NUMBER
DISCHARGE TIME 10:00p
REFERRED TO: Dr. Alegro
DOCTOR'S SIGNATURE PRINT: [Signature]
SIGN: [Signature] / 67

PAT. ACCOUNT NO. 260421971 TREATMENT ROOM ER SEX F RACE W MAR MARRIAGE 4 PAT. TYPE 4 DRG. LENGTH OF STAY MED. REC. UNIT NO. 003704308 REG. BY DMM ADMIT DATE/TIME 9/16/86 1986

PATIENT INFORMATION LANGREHR BETTY TELEPHONE NO. 5289197 PAT. B.S. NO. 113627471 RELIGION B

1640 S. HANOVER ST BALTIMORE MD 2123000000 BIRTHDATE/AGE 1/27/55 31 PREVIOUS ADMIT INFO. PATIENT EMPLOYEE INFORMATION FARM FRESH HAMMONDS LANE BALTIMORE MD 21225

FATHER'S NAME JEFFERS FRANK BIRTH PLACE N/A MOTHER'S MAIDEN NAME LEE MELVA PATIENT OCCUPATION CASHIER 301 000

NEAREST RELATIVE/FRIEND, ADDRESS, TELEPHONE FRANK LANGREHR SAME HUSBAND 000 0000 0000 EMERGENCY NOTIFICATION, NAME, ADDRESS, TELEPHONE N/A

INSURANCE INFORMATION 000 NONE 000 NONE

RESPONSIBLE PARTY/GUARANTOR LANGREHR BETTY 000000000 GUARANTOR'S EMPLOYER INFORMATION SAME

1640 S. HANOVER ST BALTIMORE MD 2123000000 301-528-9197 000- -0000 0000

ACCIDENT ILLNESS INJURED AT WORK PRIVATE/COMP. DOCTOR Auto Accident DATE & TIME

POLICE NOTIFIED NUMBER BROUGHT IN BY NUMBER COMMENTS N/A IN REEBIRD AVE. POLICE WERE NOTIFIED

LOCATION AND DESCRIPTION OF ACCIDENT OR ILLNESS PT STS SHE HAS INJURY TO NECK.

SIGNED: Betty Langrehr N. Y. Melton

I HEREBY GIVE THE ABOVE INFORMATION WHICH IS TRUE.

ER
LANGREHR.

BETTY

060451971

003904558

9/16/86

1640 S. HAROVER ST

1/27/55

P W

31

ER

RADIOLOGY DEPARTMENT
SOUTH BALTIMORE GENERAL HOSPITAL
BALTIMORE, MARYLAND 21230

X-RAY NUMBER 07-52-67

INDICATION: R/O FRACTURE

CERVICAL SPINE: 9-16-86

Vertebral body height and bony architecture, the alignment, the disc spaces, the spinus processes and the odontoid appear intact.



ROBERT BARNHART, M.D./mm
9-17-86

INDICATION FOR EXAMINATION ON REVERSE SIDE

STATEMENT

MAKE CHECKS PAYABLE TO:

HARBOR RADIOLOGISTS, P. A.
 P. O. BOX 64299
 BALTIMORE, MD 21264

ADDRESS CORRECTION REQUESTED

PATIENT	
BETTY L LANGREHR (301) 528-9197	
DATE	ACCOUNT NUMBER
12/04/86	75*060451971

BALANCE (A, 5)
 \$28.00

FOR ASSISTANCE CALL (301) 281-1510

PLEASE DETACH THIS PORTION AND RETURN WITH PAYMENT OR CORRESPONDENCE

BETTY L LANGREHR
 1640 S. HANOVER ST
 BALTIMORE MD 21230
 75*060451971

HARBOR RADIOLOGISTS, P. A. 7135 WINDSOR BLVD

DATE	CODE	3	DESCRIPTION	SUMMARY	AMOUNT
12/16/86	72040	3	CERV SPINE 3 VIEWS AP/LAT/ODON	1 @ 28.00	28.00

PATIENT	ACCOUNT NUMBER - PLEASE PRINT ON ALL PAYMENTS AND CORRESPONDENCE	AMOUNT DUE
BETTY L LANGREHR BALTIMORE GEN HOSP-ER	75*060451971 52-0893218 PHYSICIAN OF SBGH ER	\$28.00
PLACE OF SERVICE	TAX ID. NO.	REFERRING PHYSICIAN

- - - W A R N I N G - - -

YOUR ACCOUNT IS SERIOUSLY DELINQUENT. PAYMENT IS DUE IMMEDIATELY.

IF YOU HAVE RECENTLY MADE PAYMENT, DISREGARD THIS NOTICE.

BOX 85
CAMP HILL, PA. 17011

P.O. BOX 8119
COLUMBIA, S.C. 29260

BOX 82
CAMP HILL, PA. 17011

DANIEL CAGAN ESQ
5 LIGHT ST STE 800
BALTIMORE MD 21230

(CHECK ONLY ONE)

READ INSTRUCTIONS BEFORE COMPLETING OR SIGNING THIS FORM

Form Approved OMB No. 0938-0008

PATIENT & INSURED (SUBSCRIBER) INFORMATION		
1. PATIENT'S NAME (First name, middle initial, last name) ETTY LANGREHR		2. PATIENT'S DATE OF BIRTH 01 27 55
4. PATIENT'S ADDRESS (Street, city, state, ZIP code) 40 S HANOVER ST BALTIMORE MD 21230 PHONE NUMBER 528-9197		3. INSURED'S NAME (First name, middle initial, last name) BETTY LANGREHR
5. PATIENT'S SEX MALE <input type="checkbox"/> FEMALE <input checked="" type="checkbox"/>		6. INSURED'S I.D. or MEDICARE NO. (Include any letters)
7. PATIENT'S RELATIONSHIP TO INSURED SELF <input checked="" type="checkbox"/> SPOUSE <input type="checkbox"/> CHILD <input type="checkbox"/> OTHER <input type="checkbox"/>		8. INSURED'S GROUP NO. (Or Group Name)
9. OTHER HEALTH INSURANCE COVERAGE - Enter Name of Policyholder and Name and Address and Policy or Medical Assistance Number NONE		10. WAS CONDITION RELATED TO A. PATIENT'S EMPLOYMENT YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> B. AN ACCIDENT AUTO <input checked="" type="checkbox"/> OTHER <input type="checkbox"/>
11. INSURED'S ADDRESS (Street, city, state, ZIP code) SAME		13. I AUTHORIZE PAYMENT OF MEDICAL BENEFITS TO UNDERSIGNED PHYSICIAN OR SUPPLIER FOR SERVICE DESCRIBED BELOW NOT APPLICABLE TO BLUE SHIELD SIGNATURE ON FILE DATE 09/16/86

PHYSICIAN OR SUPPLIER INFORMATION		
14. DATE OF SERVICE 9/16/86	15. ILLNESS (FIRST SYMPTOM) OR INJURY (ACCIDENT) OR PREGNANCY (LMP)	15. DATE FIRST CONSULTED YOU FOR THIS CONDITION
16. HAS PATIENT EVER HAD SAME OR SIMILAR SYMPTOMS? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	16A. IF AN EMERGENCY CHECK HERE <input checked="" type="checkbox"/>	
17. DATE PATIENT ABLE TO RETURN TO WORK	18. DATES OF TOTAL DISABILITY FROM THROUGH	18. DATES OF PARTIAL DISABILITY FROM THROUGH
19. NAME OF REFERRING PHYSICIAN OR OTHER SOURCE (e.g., public health agency)		20. FOR SERVICES RELATED TO HOSPITALIZATION GIVE HOSPITALIZATION DATES ADMITTED DISCHARGED
21. NAME & ADDRESS OF FACILITY WHERE SERVICES RENDERED (other than home or office) S. BALT. GEN. HOSP.		22. WAS LABORATORY WORK PERFORMED OUTSIDE YOUR OFFICE? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>

23. DIAGNOSIS OR NATURE OF ILLNESS OR INJURY RELATE DIAGNOSIS TO PROCEDURE IN COLUMN E BY REFERENCE NUMBER 1, 2, 3, ETC. OR DX CODE 723.1 CERVICALGIA E81.9 MV TRAFFIC ACCIDENT NOS E13. P.C (ORAL) NARCOTIC GIVEN IN ER E04. VISIT TO ER BETWEEN 6PM AND 8AM		23B. EPSDT YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> FAMILY PLANNING YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> PRIOR AUTHORIZATION NO.
---	--	--

A	B	C	D	E	F	G	H
DATE OF SERVICE TO	PLACE OF SERVICE	TOS	FULLY DESCRIBE PROCEDURES, MEDICAL SERVICES OR SUPPLIES FURNISHED FOR EACH DATE GIVEN (PROCEDURE CODE IDENTIFY) (EXPLAIN UNUSUAL SERVICES OR CIRCUMSTANCES)	DIAGNOSIS CODE	CHARGES	DAYS OR UNITS	LEAVE BLANK
CODE... DESCRIPTION			*** ADDITIONAL DIAGNOSIS ***				
847.0			SPRAIN OF NECK				
1686	2	90517	EXTENDED EMERGENCY ACCIDENT TREATMENT	1, 2, 3 4, 5	110 00	01	

26. ACCEPT ASSIGNMENT (FOR GOVERNMENT CLAIMS ONLY) (SEE BACK) YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		27. TOTAL CHARGE \$110 00	28. AMOUNT PAID 0 00	29. BALANCE DUE 110 00
30. YOUR SOCIAL SECURITY NO. NIEL CAMPO, M.D. DATE 093086		31. PHYSICIAN'S OR SUPPLIER'S NAME, ADDRESS, ZIP CODE & I.D. NO. HANOVER EMERGENCY SERVICES FOUNDATION, INC. P.O. BOX 13527 BALTIMORE MD 21230		
33. YOUR EMPLOYER I.D. NO. 00299941 BL CAR		34. YOUR TELEPHONE NO. 52-1272422 301-337-8150		

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:

EDWARD R. COHEN M.D.

LAWRENCE BLUMBERG M.D.

GARY W. PUSHKIN M.D.

MICHAEL S. PROPPER M.D.

CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:

HENRY A. YOUNG M.D.

reply to:

WINTOWN	<input type="checkbox"/>	2506 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
BALTIMORE COUNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
N BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Re: Betty Langrehr
1640 South Hanover Street
Baltimore, Maryland 21230

D/A: September 16, 1986

FOR PROFESSIONAL SERVICES:

Neurosurgical consultation
on 9/18/86

\$250.00

Henry A. Young, M. D.

HAY:ps

COHEN, ED BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:
EDWARD R. COHEN M.D.
LAWRENCE BLUMBERG M.D.
GARY W. PUSHKIN M.D.
MICHAEL S. PROPPER M.D.
CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:
HENRY A. YOUNG M.D.

reply to:

DOWNTOWN	<input type="checkbox"/>	2506 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
BALTIMORE COUNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
GLEN BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Michael S. Propper, M. D.
Southdale Square Office Building
8055 Ritchie Highway
Pasadena, Maryland 21122

Re: Betty Langrehr
1640 South Hanover Street
Baltimore, Maryland 21230
D/A: September 16, 1986

Dear Doctor Propper:

Thank you for referring your patient, Betty Langrehr, to me for neuro-surgical consultation regarding post-traumatic headaches. As you know, she was injured in an automobile accident on the above date. Though she sustained no loss of consciousness, she was dazed by the accident. Since that time she has had significant headache. The headache is most often occipital in location. It is constantly present throughout the day. At times it is pounding and quite painful. At times it spreads to involve the entire head.

PAST MEDICAL HISTORY: Non-contributory.

PHYSICAL EXAMINATION:

Examination of the head and neck reveals no obvious external evidence of trauma. There is moderate tenderness posteriorly in the mid-cervical spine. There is also significant paravertebral spasm throughout the cervical spine. There is no subgaleal fluid accumulation noted. No bony deformity is appreciated.

NEUROLOGICAL EXAMINATION:

MENTAL STATUS:

The patient is alert and oriented to person, place and time. Recent and remote memory are intact. The speech pattern is normal with no evidence of aphasia.

Re: Betty Langrehr

-2-

September 18, 1986

CRANIAL NERVES:

- I. No apparent difficulty with olfaction is noted.
- II. The pupils are equal, round and reactive to light and accommodation. The disc margins are sharp, and the fundi are benign. Visual fields are full to confrontation.
- III., IV., VI. The extraocular movements are full. No nystagmus is noted.
- V. No motor or sensory deficit is noted in the trigeminal distribution.
- VII., VIII.-XII. The face is symmetric. No significant hearing loss is noted. The gag reflex is intact without evidence of uvular deviation. The sternocleidomastoid and trapezius exhibit normal motor function. The tongue is protruded midline without evidence of glossal atrophy.

MOTOR:

Motor strength appears to be 5/5 in all groups tested. However, the left upper extremity, in the distal muscle groups, is difficult to evaluate due to pain in the patient's wrist, which is being evaluated by Doctor Fropper. There is no pronator drift.

SENSORY:

Sensory examination is intact to all modalities.

REFLEX:

The reflexes are symmetric, with no pathological reflexes noted. The sign of Babinski is negative.

Re: Betty Langrehr

-3-

September 18, 1986

CEREBELLAR:

Cerebellar testing disclosed no evidence of axial or appendicular ataxia. Finger to finger, finger to nose, and heel to shin testing is normal. Rapid alternating movements are well performed with no evidence of dysdiadochokinesis.

GAIT AND STATION:

Tests of gait and station, including tandem gait, are within normal limits. Romberg's sign is not present.

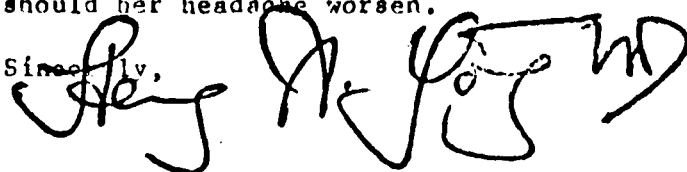
IMPRESSION:

Post-traumatic headaches.

RECOMMENDATIONS:

I have told the patient that post-traumatic headache is benign and usually resolves with time, but may take a period of weeks to several months to resolve completely. I have started the patient on Equagesic tablets, two tablets, p.o., q six hours (#100 - 0 refills) and Flexeril, 10 mg. tablets, one tablet, p.o., qhs (#50), for headache. I have not arranged a return appointment for her, but would be glad to see her should her headache worsen.

Sincerely,



Henry A. Young, M. D.

HAY:ps

PHONE: 760-3777
 PHYSIC THERAPY ASSOCIATES
 PATRIOTS PLAZA OFFICE BUILDING
 8055 RITCHIE HIGHWAY - SUITE 203
 PASADENA, MARYLAND 21122

Physician

Michael S. Propper, M.D.

DATE OF ACCIDENT

9-16-86

DIAGNOSIS

Cervical Sprain

PRESCRIPTION/MODALITIES

Moist Heat, Massage

Billing Information

EMP:

INS. CO.

ATTY. Daniel Cagan, ESQ.

5 Light Street - S. 800
 Baltimore, Maryland
 21202

PAST DUE NOTICE

Payment of this bill is past due. Please send payment or contact this office regarding the present status of this account.

LANGREHR, Betty
 1640 South Hanover St.
 Baltimore, Maryland
 21230

S.S. NO.

213-62-7471

Telephone

Year

1986

STATEMENT OF CHARGES 528-9197

DATE	CHARGE	CREDIT	BALANCE	DATE	CHARGE	CREDIT	BALANCE
9-18-86	55.00		55.00	JUN 30 1987			
9-19	40.00		95.00	DEC 30 1987			
9-24	40.00		135.00				
9-25	40.00		175.00				
9-30	40.00		215.00				
10-6	40.00		255.00				
10-7	40.00		295.00				
10-14	40.00		335.00				
10-22	40.00		375.00				
10-24	40.00		415.00				
11-24	40.00		455.00				
1-13-87			455.00				

NSC	No Significant Change	LS	Lumbar Spine	TR	Trunk
WNL	Within Normal Limits	CS	Cervical Spine	LT	Left
TTP	Tenderness to Palpation	RTD	limited	RT	Right
HOM	Range of Motion	P	Pain	L	Loss
TR	Treatment Rendered	N	Normal	S	Subjective Complaint
IW	Ipsilateral Weak	LBP	Low Back Pain	O	Objective Findings
MT	Muscle Tightness	BL	Bilaterally	LFTL	limited Few Terminal Digits
TS	Thoracic Spine	FL	Flexion		

MAKE CHECKS PAYABLE TO: PHYSICAL THERAPY ASSOCIATES
 FULLER MEDICAL CENTER - SUITE ONE
 6918 RIDGE ROAD
 BALTIMORE, MARYLAND 21237

I.D. #: 52-1218949

INFORMATION CALL: 687-5040

ANY CORRESPONDENCE SEND TO SAME ADDRESS.

INITIAL EVALUATION

NAME: Betty Langels DOCTOR: Crupper

D/A: 9/14/86

Patient was seen today for injuries sustained in a MVA, WRA on the above date.

Today the patient is complaining of constant severe neck & left shoulder pain

Objective Findings: Active cervical ROM is markedly limited in all planes due to pain & muscle guarding (25% of normal) (2) shoulder is restricted to shoulder level due to pain - Very tender to palpation in (2) upper trap. Mus. tightness in upper trap.

Diagnosis: Cervical Strain
(2) Shoulder strain

Plan of Treatment: to pain & improve mobility

- Moist heat
- Massage
- Range of Motion
- Ultrasound
- Cervical Traction
- Exercises
- Whirlpool
- Other home instructions

Out straight RPT

PROGRESS AND DOCUMENTATION NOTES

NAME: Betty Langels

DATES: 9/18/86 See initial eval.

9/19/86 M.L. msg. ROM to neck & shoulder. No change. Out straight RPT

9/24/86 Neck painful, better following to M.L. msg. & slight improvement. P. cont to.

9/25/86 Neck painful. M.L. msg. & some ROM still some tightness in upper trap. Out straight RPT

9/30/86 M.L. (U.S. med.) msg. Out straight RPT

10/6/86 M.L. U.S. msg. starts improving

10/12/86 M.L. U.S. msg. - Cont to improve.

10/12/84

to have hand surgery
o. U.S. ml. may to neck & shoulder
A. Neck & shoulder ROM improving
5% of normal rotation

10/22/84 M. L. 4.5 hr.
TTP in D upper trap not being well

10/24/84 A. Occasional headache & shoulder pain
but generally better
o. C. ROM normal in flex & ext, rotation
60% of normal. M. L. 4.5 may 4.
A. Improving - more tightness in D upper trap
P. Cont

11/24/84 Returned to Hospital for following
hand surgery. O.R. R.P.

DISCHARGE NOTE

DATE: 11-24-86

PATIENT'S NAME: Betty Langford

D/A: 9/10/86

REFERRING DOCTOR: M. Duggan
Regimen Ex. stum

DESCRIPTION OF PROBLEM The client reports severe constant neck, shoulder pain & headache. Unable to elevate arm above shoulder level. Must sleep sitting up due to severe pain.

TREATMENT Treatment consisted of manual neck massage, gentle ROM to the C7 shoulder & neck. Ultrasound was added along to provide a better stretching of the tight musculature.

ASSESSMENT The client was making steady progress with painful symptoms. Cervical & C4-5 ROM was still restricted but markedly improved since initial visit. Muscular tightness in the Duggan traps was decreased. The client was involved in another MRSA on 11/24/86.

DISPOSITION

Pat Knight
PHYSICAL THERAPIST



STATE FARM INSURANCE COMPANIES

REPAIR ESTIMATE

9/16
 POLICY NO. 20-3010-388 DATE OF ESTIMATE 11/3/86
 INSURED Hobbs WHERE INSPECTED S.P.

ADDRESS _____ PHONE NO. _____
 NAME OF OWNER Langehr PHONE NO. _____

1978 Ford 2 1/2 section Granada 07976 HRF355
 YEAR MAKE BODY STYLE MODEL MILEAGE LICENSE

APPRAISER: H.A. MacLennan VEHICLE IDENTIFICATION # 8E831Z08913

Power Steering Power Brakes Factory Air Cond. Under Dash Air Cond. Radio AM. Radio AM, FM. Number Cyl. _____
 Transmission Automatic 3 Speed Standard 4 Speed Standard Floor Shift Electric Windows Electric Seats
 Electric Window Def. Vinyl Roof Tape Player CLAIM REPR. - C. McLen / 265-6600

FRONT	NET	HRS.	PARTS	FRONT & SIDE	NET	HRS.	PARTS
Bumper <u>align</u>		2.0		Fender Right			
Guard				Mldg / Name			
Arms <u>high back</u>		1.0		Skirt / Extn			
Shield							
Valance <u>LR</u>	15.75	1.0		Fender Left			
<u>FLUDED WTS SITE</u>				Mldg / Name			
Grille <u>LOWER UPPER</u>	62.50	2.0		Skirt / Extn			
Panel <u>LOWER UPPER</u>		5.0					
Emb / Mldg. <u>LR</u>				Windshield TINT CLEAR			
Supt.				Cowl			
				Hinge Pillar			
Radiator				Revel Mldg.			
Supt / Bffe				Rocker			
Shroud				Mldg			
Fan / Clutch				Sill Plate			
Water Pump				Floor			
Coolant / Belt				Center Pillar			
Headlamp				Door Front			
Door / Gskt				Lock			
Beam / Ret				Handle / Button			
				Weatherstrip			
Pk Lamp				Hinge			
Side Lamp				Glass			
Hood				Regulator			
Mldg / Name				Mldg			
Lock							
Hinge / Brkt.							
				Door Rear			
Front System				Lock			
Up Cont. Arm/Shft				Handle / Button			
Lr Cont. Arm/Shft				Weatherstrip			
Hub & Drum				Hinge			
Knuckle				Glass			
Shock				Regulator			
Strg Wheel / Ring				Mldg.			
Tie / End							
Strg. Column				Roof			
Frame							
				Rear Glass			

REAR & MISC.	NET	HRS.	PARTS
Qtr. R			
Qtr. L			
Extn			
Mldg / Name			
Whl Hsg			
Tail Gate			
" Hinge			
" Mldg.			
" Rail			
Trunk Lid / Hinge			
Lock			
Mldg / Name			
Bumper Rear			
Arms			
Valance			
Rear Body Panel			
Trunk Floor			
License Lamp			
B/U Light			
Tail Lamp			
Side Lamp			
Air Cond			
Condenser			
Recharge			
<u>paint candidate</u>			
Fuel Tank			
Mtr Supts			
Trans Lkg			
Tail Pipe / Hangar			
Cover Disc.			
Battery			
Antenna			
Wheel & Stem			
Axle / BRNG SEAL			
Hub DISC CUP			
Tire			
Seat			
Seat Guide			
Striping			
Paint & Mat.	20.00	2.0	
Wrecker			
LABOR BODY	1.0 HRS @ 20.00		\$ 180.00
MECH.	HRS @		\$
PARTS	LESS	%	\$
NET & SUBLET			\$ 101.25
TAX			\$ 5.05
APPRAISAL TOTAL			\$ 286.30
DEDUCTIBLE			\$
BETTERMENT			\$
OWNER TO PAY			\$
COMPANY TO PAY			\$

The Below Agrees To Make Guaranteed Repairs As Per Appraisal, When Authorized By Owner
 Accepted By: _____ Person Phone Garage: _____

A-Align 1-2-New OH-Overhaul S-Straighten R-Repair
 THIS IS NOT AN AUTHORIZATION FOR REPAIRS
 RM MO 82.1

*THIS ESTIMATE INCLUDES PRICES BASED UPON ONE OF MORE NON-ORIGINAL EQUIPMENT MANUFACTURER PARTS/OR OTHER LIKE KIND, AND QUALITY PARTS

PREVAILING COMPETITIVE PRICE
 Policy explained to owner
 Labor rate at \$20 per hour
 parts discount 10%

LK-PAK
 707-5200

5/2/90

Def's No 1



5/2/90

Debi's No 2



J. Hollander

LAW OFFICES
CAGAN & GANN
SUITE 201
ONE EAST LEXINGTON STREET
BALTIMORE, MARYLAND 21202

DANIEL W. CAGAN (301) 727-5565
WILLIAM S. GANN (301) 244-0100

OF COUNSEL
GERALD A. ZIMLIN

December 13, 1990

Clerk,
Circuit Court for Baltimore
City
111 N. Calvert Street
Baltimore, Maryland 21202

Re: Langrehr vs. Hobbs
Case No.90215022/CL117523

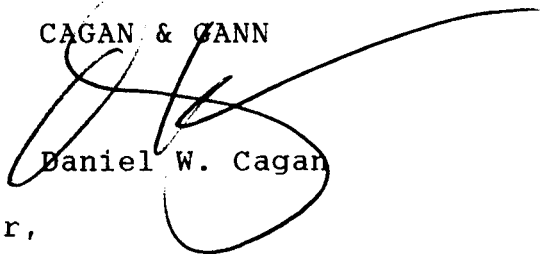
Dear Madam Clerk:

Enclosed please find Plaintiff/Appellant's Memorandum regarding the above captioned case.

Your cooperation and assistance in filing same among the Court documents is appreciated.

Very truly yours,

CAGAN & GANN



Daniel W. Cagan

DWC:sw
cc: Judge Ellen L. Hollander,
David B. Ginsburg, Esq.

BETTY LANGREHR * IN THE CIRCUIT COURT
 Plaintiff/Appellant * OF MARYLAND
 vs. * FOR
 EPHRAIM HOBBS * BALTIMORE CITY
 Defendant/Appellee * Case: 90215022/CL117523

FILED
 BALTIMORE CITY
 DEC 18 1990
 CIRCUIT COURT FOR
 BALTIMORE CITY

* * * * *

PLAINTIFF/APPELLANT'S MEMORANDUM

STATEMENT OF CASE

The facts of this case, put briefly, concern an automobile accident in which the Plaintiff/Appellant, was a passenger in her husband's car. The automobile was stopped at an intersection, waiting for a traffic light to change, and, while so waiting, Appellant's husband's car was struck by the Defendant/Appellee's vehicle. At trial, the Judge found, as a matter of fact, that the Appellee caused the accident by making too wide a turn and striking Appellant's husband's car.

The Trial Judge, at that point, was going to award the Appellant property damages. However, the Judge then learned that Appellant's husband, the owner of the car, was never a party to the suit and so refused to award any property damages, stating that there was "no claim". In addition, the Judge went further and found, as a factual matter, that the accident could not possibly have caused the injuries that Appellant alleged. Although none of Appellant's treating physicians had been called to testify, the parties had stipulated to all of Appellant's medicals, histories, and bills. The medicals clearly indicate that Appellant was being

treated by these physicians for injuries specifically sustained by her in the accident in question. She was seen at Harbor Hospital shortly after the accident and then followed by her own physician thereafter.

Finally, the Trial Judge, as a result of deciding that Appellant had, in fact, sustained no injuries (damages), rendered a judgment for the Defendant/Appellee, even though he had decided earlier, as a factual matter, that the Defendant/Appellee had indeed caused the accident.

QUESTIONS PRESENTED

I. Does the Trial Judge's decision, in not finding a causal connection between Appellee's injuries and the accident, constitute a clear abuse of discretion?

II. Did the Trial Judge, in light of his earlier finding that the Appellee caused the accident, commit reversible error in not finding for Appellant, basing the decision on his finding that Appellant sustained no damages?

ARGUMENT

I. The first question to be answered, then, is whether the Trial Judge abused his discretion in not finding causally for Appellant regarding her injuries and the accident in question.

Although Appellant concedes that a Trial Judge has broad latitude regarding rulings and findings of fact made at trial, City of Baltimore v. Schreiber, 243 Md. 56 (1966), it is also settled law in Maryland that "the limits of a Trial Court's discretion are narrow when the consequences of a particular exercise of discretion are clear, so that one result is clearly just and the other result

is clearly unjust..." Thodos v. Bland, 75 Md. App. 700 (1988). Further, when the abuse of discretion standard is applied by an Appellate Court to a Trial Judge's factual findings, it is incumbent upon that Appellate Court "to check to be sure that the Trial Court has exercised its discretion within the range of permissible alternatives, based on all relevant factors and no improper factors." Johnson v. United States, D.C. App., 398 A.2d 354 (1979). The Appellate Court then evaluates whether the decision is supported by "substantial" reasoning, (that is), drawn from a firm factual foundation in the record." Id. at 364. "An informed choice among the alternatives requires that the Trial Court's determination be based upon and drawn from a firm factual foundation. Just as a Trial Court's action is an abuse of discretion if no valid reason is given or can be discerned for it,...so also it is an abuse if the stated reasons do not rest upon a specific factual predicate." Id. Moreover, it is settled that it is incumbent upon the Trial Judge to "take pains to ensure that the record reflects both the foundations and the reasoning behind the discretionary decision." Greater Boston Television Corp. v. FCC, 444 F.2d 841 (1980).

Appellant urges that the Trial Judge in the instant case would be hard pressed to explain in the rationale behind his factual finding that there is no causal connection between Appellant's injuries and the automobile accident. This finding was made in spite of numerous medical reports and histories that clearly indicate that the Appellant was being treated solely for injuries specifically sustained in the accident and, as stated, the parties

had even stipulated as to those reports. (A copy of said reports are attached hereto). Further, there was not one iota of evidence introduced by Appellee or anyone else contradicting in the least Appellant's assertions regarding her injuries. As such, there is absolutely no discernible reason or reasonable basis to be found in the record for the Judge to have decided that Appellant did not sustain her injuries as so alleged.

It is settled that judicial decisions may be overturned where it is apparent that some serious error, abuse of discretion or autocratic action has occurred. Northwestern Nat. Ins. Co. v. Rosoff, 195 Md. 421 (1949). As such, Appellant urges that the decision of the Trial Judge regarding causal connection being clear that that decision is against the great weight of compelling and incontrovertible evidence and is totally without any discernible or rational foundation, be set aside as clearly erroneous. Schakow v. Medical-Legal Consulting Serv., Inc. 46 Md. App. 179 (1980); Knowles v. Binford, 268 Md. 2 (1973).

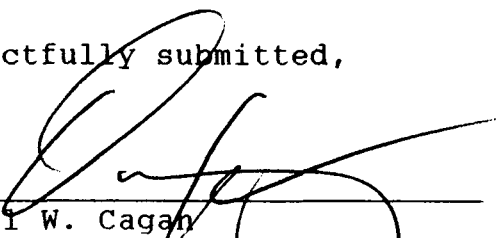
II. Appellant also urges that the Trial Judge's decision rendering a verdict for the Appellee be set aside as reversible error. In the case at bar, it may not be disputed that the Trial Court's verdict for the Appellee works a real injustice on the Appellant. The record amply demonstrates that the Appellant was not and, indeed, could not have been, responsible for the accident. Nor is there any evidence that the accident resulted from an act of God or unavoidable consequences. Again, it must be emphasized, the Judge himself made a factual finding earlier in the hearing that the Appellee caused the accident (see transcript, p.

110, L.12-14). As previously stated, however, the Judge rendered a verdict for the Appellee because he decided that the Appellant sustained no injuries (damages). Although he agreed that the Appellee caused the accident, he decided that the force of the impact was not sufficient to have caused the injuries of which Appellant complained and that, therefore, Appellee was entitled to the verdict.

Appellant urges, on this point also, that the Judge seriously misread the law. It is clear that the Appellant was entitled to the verdict and at least nominal damages for Appellee's violation of a technical right. It is settled that "every injury to the rights of another imports damages, and, if no other damage is established, the party injured is at least entitled to a verdict for nominal damages." Mason v. Wrightson, 205 Md. 481 (1954). "The term "nominal damage" means a trivial sum, usually one cent or one dollar, awarded to a Plaintiff whose legal right has been technically violated but who has proved no real damage". Morrisette v. Boiseau, 91 A.2d 130 (1952).

Therefore, in the case at bar, it certainly constitutes reversible error for the Trial Judge, especially in light of his earlier finding that the Appellee indeed caused the accident, to have rendered a verdict for the Appellee simply because he decided that the Appellant suffered no damages. It is elementary that the Appellant was entitled, at the very least, to a favorable verdict and nominal damages.

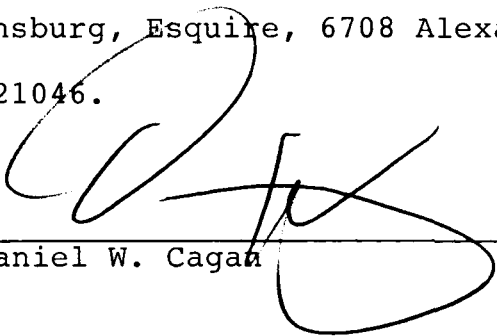
Respectfully submitted,



Daniel W. Cagan
1 East Lexington St., Suite 201
Baltimore, Maryland 21202
(301) 727-5565
Attorney for Plaintiff/Appellant

CERTIFICATE OF MAILING

I HEREBY CERTIFY, that on this 13 day of December
1990, a copy of the foregoing Plaintiff/Appellant's Memorandum
was mailed to David B. Ginsburg, Esquire, 6708 Alexander Bell
Drive, Columbia, Maryland 21046.



Daniel W. Cagan

DOB-1-27-55

STATEMENT

COHEN & BLUMBERG, M.D., P.A.

Daniel Cagan
5 L... Street
Balto, Md. 21202

MICHAEL S. PROPPER, M.D.

Patriots Plaza Office Bldg.
8055 Ritchie Hwy. Pasadena, Md. 21122
Telephone 760-3777

PRACTICE LIMITED TO
ORTHOPEDIC SURGERY

Langrehr, Betty
1640 S, Hanover St
Baltimore, Maryland 21230

~~D/A 9-16-86~~

BALANCE FORWARD

DATE	DETAIL	CHARGE	CREDIT	BALANCE
ESQ 9-18-86	- UC	150		150
ESQ 10-9-86	- F	75		225
ESQ 10-16-86	- F	75		300
ESQ 12-1-86			140	160
PLEASE ADVISE OF STATUS				

PLEASE PAY LAST AMOUNT IN BALANCE COLUMN

- X - X-Ray
- OC - Office Consultation
- HC - Hospital Consultation
- F - Follow Up Visit
- MR - Medical Report
- ADJ - Fee Adjustment
- NC - No Charge
- S - Surgery
- CA - Cast Application
- MS - Medical Supplies
- PT - Physical Therapy
- FT - Fracture Treatment
- IT - Injury Treatment
- BS - Blue Shield Payment
- IP - Insurance Co. Payment
- CP - Cash Payment
- CJ - Cortisone Injection
- IV - Initial Visit

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:

EDWARD R. COHEN M.D.
LAWRENCE BLUMBERG M.D.
GARY W. PUSHKIN M.D.
MICHAEL S. PROPPER M.D.
CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:

HENRY A. YOUNG M.D.

reply to:

DOWNTOWN	<input type="checkbox"/>	2506 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
BALTIMORE COUNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
GLEN BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Re: Betty Langrehr
S.S.#: 213-62-7471
D/A: September 16, 1986

FOR PROFESSIONAL SERVICES

Orthopedic evaluation
on 9-18-86

\$150.00

Fees for physical therapy are submitted separately.

Michael S. Propper, M. D.

MSP:esp

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:

EDWARD R. COHEN M.D.

LAWRENCE BLUMBERG M.D.

GARY W. PUSHKIN M.D.

MICHAEL S. PROPPER M.D.

CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:

HENRY A. YOUNG M.D.

reply to:

DOWNTOWN	<input type="checkbox"/>	2508 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
BALTIMORE COUNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
GLEN BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Re: Betty Langrehr

S.S.#: 213-62-7471

D/A: September 16, 1986

ORTHOPEDIC SURGEON'S REPORT:

Ms. Langrehr is seen today in orthopedic examination for injuries sustained in an automobile accident on the above date. The patient describes the impact as severe. She noted the slow onset of neck pain and stiffness that are non-radiating in nature. She states her neck aches continuously.

PAST MEDICAL HISTORY: Non-contributory.

PHYSICAL EXAMINATION:

Inspection of the cervical spine reveals no visible deformity. Both trapezius muscles are tender to deep palpation. Left-sided trapezial muscle spasm is palpated. Range of motion in the cervical spine is limited twenty (20%) percent in all planes. Compression of the cervical spine produces discomfort, but no neurological symptoms. Disc traction of the cervical spine provides mild symptomatic relief. Adson's test and Tinel's test are negative. Neurocirculatory examination is intact.

X-RAY EXAMINATION:

No x-rays were taken today. Reports from South Baltimore General Hospital, where the patient was initially treated, were obtained.

IMPRESSION:

Musculoligamentous sprain-strain of the cervical spine, post-traumatic.

Re: Betty Langrehr

-2-

September 18, 1986

RECOMMENDATIONS:

I have placed the patient out of work at this time. She is to receive physical therapy to her cervical spine over the next two weeks and take an oral anti-inflammatory medication, Indocin, 25 mg., one three times daily. Follow-up is scheduled in two weeks.

Sincerely,

Michael S. Propper M.D.

Michael S. Propper, M.D.

MSP:esp

COHEN AND BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:
EDWARD R. COHEN M.D.
LAWRENCE BLUMBERG M.D.
GARY W. PUSHKIN M.D.
MICHAEL S. PROPPER M.D.
CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:
HENRY A. YOUNG M.D.

reply to:

DOWNTOWN 2506 SAINT PAUL STREET / BALTIMORE, MD 21218
BALTIMORE COUNTY FRANKLIN SQUARE MEDICAL ARTS BUILDING
9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237
GLEN BURNIE PATRIOTS PLAZA OFFICE BUILDING
8055 RITCHIE HIGHWAY / PASADENA, MD 21122

BY APPOINTMENT TELEPHONE 235-3300
BY APPOINTMENT TELEPHONE 574-9300
BY APPOINTMENT TELEPHONE 760-3777

September 18, 1986

Re: Betty Langreh
1640 South Hanover Street
Baltimore, Maryland 21230

D/A: September 16, 1986

FOR PROFESSIONAL SERVICES:

Neurosurgical consultation
on 9/18/86

\$250.00

Henry A. Young, M. D.

HAY:ps

COHEN ED BLUMBERG M.D., P.A.

PRACTICE LIMITED TO ORTHOPEDIC SURGERY:
EDWARD R. COHEN M.D.
LAWRENCE BLUMBERG M.D.
GARY W. PUSHKIN M.D.
MICHAEL S. PROPPER M.D.
CONSTANTINE A. MISOUL M.D.

PRACTICE LIMITED TO NEUROSURGERY:
HENRY A. YOUNG M.D.

reply to:

DOWNTOWN	<input type="checkbox"/>	2506 SAINT PAUL STREET / BALTIMORE, MD 21218	BY APPOINTMENT	TELEPHONE 235-3300
BALTIMORE COUNTY	<input type="checkbox"/>	FRANKLIN SQUARE MEDICAL ARTS BUILDING 9101 FRANKLIN SQUARE DRIVE / BALTIMORE, MD 21237	BY APPOINTMENT	TELEPHONE 574-9300
GLEN BURNIE	<input checked="" type="checkbox"/>	PATRIOTS PLAZA OFFICE BUILDING 8055 RITCHIE HIGHWAY / PASADENA, MD 21122	BY APPOINTMENT	TELEPHONE 760-3777

September 18, 1986

Michael S. Propper, M. D.
Southdale Square Office Building
8055 Ritchie Highway
Pasadena, Maryland 21122

Re: Betty Langrehr
1640 South Hanover Street
Baltimore, Maryland 21230
D/A: September 16, 1986

Dear Doctor Propper:

Thank you for referring your patient, Betty Langrehr, to me for neuro-surgical consultation regarding post-traumatic headaches. As you know, she was injured in an automobile accident on the above date. Though she sustained no loss of consciousness, she was dazed by the accident. Since that time she has had significant headache. The headache is most often occipital in location. It is constantly present throughout the day. At times it is pounding and quite painful. At times it spreads to involve the entire head.

PAST MEDICAL HISTORY: Non-contributory.

PHYSICAL EXAMINATION:

Examination of the head and neck reveals no obvious external evidence of trauma. There is moderate tenderness posteriorly in the mid-cervical spine. There is also significant paravertebral spasm throughout the cervical spine. There is no subgaleal fluid accumulation noted. No bony deformity is appreciated.

NEUROLOGICAL EXAMINATION:

MENTAL STATUS:

The patient is alert and oriented to person, place and time. Recent and remote memory are intact. The speech pattern is normal with no evidence of aphasia.

Re: Betty Langrehr

-2-

September 18, 1986

CRANIAL NERVES:

I. No apparent difficulty with olfaction is noted.

II. The pupils are equal, round and reactive to light and accommodation. The disc margins are sharp, and the fundi are benign. Visual fields are full to confrontation.

III., IV., VI. The extraocular movements are full. No nystagmus is noted.

V. No motor or sensory deficit is noted in the trigeminal distribution.

VII., VIII.-XII. The face is symmetric. No significant hearing loss is noted. The gag reflex is intact without evidence of uvular deviation. The sternocleidomastoid and trapezius exhibit normal motor function. The tongue is protruded midline without evidence of glossal atrophy.

MOTOR:

Motor strength appears to be 5/5 in all groups tested. However, the left upper extremity, in the distal muscle groups, is difficult to evaluate due to pain in the patient's wrist, which is being evaluated by Doctor Propper. There is no pronator drift.

SENSORY:

Sensory examination is intact to all modalities.

REFLEX:

The reflexes are symmetric, with no pathological reflexes noted. The sign of Babinski is negative.

Re: Betty Langrehr

-3-

September 18, 1986

CEREBELLAR:

Cerebellar testing disclosed no evidence of axial or appendicular ataxia. Finger to finger, finger to nose, and heel to shin testing is normal. Rapid alternating movements are well performed with no evidence of dysidiadochokinesia.

GAIT AND STATION:

Tests of gait and station, including tandem gait, are within normal limits. Romberg's sign is not present.

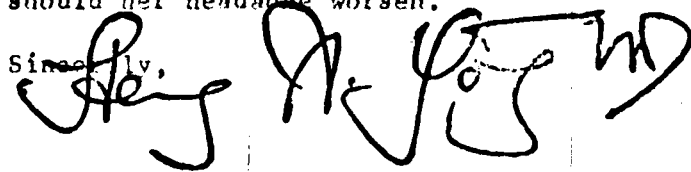
IMPRESSION:

Post-traumatic headaches.

RECOMMENDATIONS:

I have told the patient that post-traumatic headache is benign and usually resolves with time, but may take a period of weeks to several months to resolve completely. I have started the patient on Equagesic tablets, two tablets, p.o., q six hours (#100 - 0 refills) and Flexeril, 10 mg. tablets, one tablet, p.o., qhs (#50), for headache. I have not arranged a return appointment for her, but would be glad to see her should her headache worsen.

Sincerely,



Henry A. Young, M. D.

HAY:ps

SOUTH BALTIMORE GENERAL HOSPITAL/3001 S. HANOVER ST./BALTIMORE, MD. 21230/301-347-3200

14

HOSPITAL I.D.#: 52-049-1660

PATIENT NAME		RESPONSIBLE PARTY		H	PATIENT PHONE		DISCHARGED	DAYS STAY	PAGE	
ETTY L LANGREHR		LOUIS C WOOD			301-528-9197		9/16/86	9/16/86	1 OF 1	
MEDICAL RECORDS NUMBER	PATIENT STREET ADDRESS		PATIENT CITY		ST	ZIP CODE	PATIENT ACCT. NUMBER	PATIENT BIRTHDATE	SEX	DISCHARGE STATUS
904558	1640 S. HANOVER ST		BALTIMORE		MD	21230	060451971	1/27/55	F	
PATIENT TYPE		MEDICAL SERVICE TYPE		DOCTOR #	DOCTOR'S NAME		BAL FWD DATE	TOTAL CHARGES	TOTAL PAYMENTS	DUE FROM PATIENT
4					SOUTH BALTIMORE GENE					

INVOICE # 060451971

POSTING DATE	POSTING ACCOUNT NUMBER	TICKET NUMBER	REVENUE DESCRIPTION	UNIT CHARGE	UNITS	AMOUNT	PATIENT LIABILITY
9/16/86	00100008		EMERGENCY ROOM SERVICES		1	51.00	
9/16/86	00120408		CERVICAL SPN AP LAT & OD		1	33.19	
9/16/86	01354191		VALIUM TAB 5 MG UD		1	1.25	
			*** CURRENT BALANCE:		3	85.44	

SOUTH BALTIMORE GENERAL HOSPITAL

Taken to Wiggins
 Cerebral
 MVA this PM.
 to ER

3 y.o. W.F.
 involved
 initially no pain but
 ~, ~ later neck
 became very stiff &
 most of discomfort in
 neck
 @ NW @ SW

- 1) C-spine x-rays / 903 psN
- 2) soft collar / D.C.

Verdun 5...
 Pt given ketorolac patch
 Husband called home - 10:42

IMPRESSION OR DIAGNOSIS: Cervical strain

CONDITION OF DISCHARGE 1 - Stable 2 - Unchanged
 Check One 3 - Admitted

- Discharge instruction
- 1) Home
 - 2) Ibuprofen 600 #20
 - 3) Robaxon 750 #4
 - 4) Soft collar w/ pillow

ADMITTED YES NO ROOM NUMBER DISCHARGE TIME 10:00p REFERRED TO: Dr. Alvarez

DOCTOR'S SIGNATURE PRINT: [Signature] / 67

PATIENT'S SIGNATURE: [Signature]

MEDICAL RECORDS

PAT. ACCOUNT NO. 260421971 TREATMENT ROOM ER SEX F RACE W MAR. STAT. M PAT. TYPE 4 DRG. LENGTH OF STAY MED. REC. UNIT NO. 003704538 REG. BY LPM ADMIT DATE/TIME 9/16/86 1936

PATIENT INFORMATION LANGREHR BETTY TELEPHONE NO. 4101 5289197 PAT. S.S. NO. 213627471 RELIGION C

1640 S. HANOVER ST BALTIMORE MD 2123000000 BIRTHDATE/AGE 1/27/55 31 PREVIOUS ADMIT INFO. PATIENT EMPLOYEE INFORMATION FARM FRESH HAMMONDS LANE BALTIMORE 21223

FATHER'S NAME LETTERS FRANK BIRTH PLACE N/A

MOTHER'S MAIDEN NAME MELVA PATIENT OCCUPATION CASHIER 301 000

NEAREST RELATIVE/FRIEND, ADDRESS, TELEPHONE FRANK LANGREHR SAME HUSBAND 300 0000 0000 EMERGENCY NOTIFICATION, NAME, ADDRESS, TELEPHONE N/A

INSURANCE INFORMATION 000 NONE 000 NONE

RESPONSIBLE PARTY/GUARANTOR LANGREHR BETTY 000000000 SAME

1640 S. HANOVER ST BALTIMORE BC MD 212300000 301-528-9197 000- -0000 0000

ACCIDENT ILLNESS INJURED AT WORK PRIVATE/COMP. DOCTOR Auto Accident YES NO DATE & TIME 9/16/86 1741

POLICE NOTIFIED NUMBER BROUGHT IN BY NUMBER COMMENTS N/A IN REEBERS AVE. POLICE WERE NOTIFIED

LOCATION AND DESCRIPTION OF ACCIDENT OR ILLNESS PT STS SHE HAS INJURY TO NECK.

SIGNED: [Signature] CLERK'S SIGNATURE [Signature]

EMERGENCY ROOM REGISTRATION

ER
LANGREHR

BETTY
060451971

003904558 9/16/86
1640 S. HANOVER ST
1/27/55 F W 31
ER

RADIOLOGY DEPARTMENT
SOUTH BALTIMORE GENERAL HOSPITAL
BALTIMORE, MARYLAND 21230

X-RAY NUMBER 07-52-67

INDICATION: R/O FRACTURE

CERVICAL SPINE: 9-16-86

Vertebral body height and bony architecture, the alignment, the disc spaces, the spinus processes and the odontoid appear intact.



ROBERT BARNHART, M.D./mm
9-17-86

INDICATION FOR EXAMINATION ON REVERSE SIDE

MEDICAL COLLECTION SERVICES, INC.

P. O. BOX 1783
BALTIMORE, MARYLAND 21203

(301) 597-8410

93*38397

11 JUN 87

BETTY LANGREHR
DANIEL KAGEN, ATTY OFFICE
5 LIGHT ST SUITE 800
BALTIMORE MD 21202

OWED TO:
DR. ANGELL & ASSOCIATES, P. A.

PATIENT: BETTY LANGREHR
528-9197
ACCOUNT NO: 93*38397

A-11

BALANCE DUE \$36.00

* * * D E B T N O T I C E * * *

YOUR ACCOUNT IS BEING HANDLED BY THIS COLLECTION AGENCY. THE BILLING OFFICE FOR DR. ANGELL & ASSOCIATES REPEATEDLY ASKED YOU TO PAY THIS BILL. YOU MUST MAKE IMMEDIATE PAYMENT IN FULL OR YOU WILL LEAVE US WITH NO CHOICE BUT TO CONSIDER TAKING FINAL ACTION AGAINST YOU WHICH MAY JEOPARDIZE YOUR FUTURE REQUESTS FOR CREDIT.

DIRECT ALL PAYMENTS TO:

MEDICAL COLLECTION SERVICES, INC.
P. O. BOX 1783
BALTIMORE, MARYLAND 21203
(301) 597-8410

IF YOU HAVE RECENTLY MADE PAYMENT, DISREGARD THIS NOTICE.

S T A T E M E N T O F A C C O U N T

7/17/86	53100	3 WRIST LEFT COMP	MIN 3 VWS	1 @	18.00	18.00
7/17/86	47100	3 HAND LEFT MIN 3	VIEWS	1 @	18.00	18.00

					BALANCE DUE	\$36.00

STATEMENT

MAKE CHECKS PAYABLE TO:

HARBOR RADIOLOGISTS, P. A.
 P. O. BOX 64289
 BALTIMORE, MD 21264

ADDRESS CORRECTION REQUESTED

PATIENT

BETTY L LANGREHR
 (301) 528-9197

DATE

12/04/86

ACCOUNT NUMBER

75*060451971

BALANCE

\$28.00

(A. 5)

FOR ASSISTANCE CALL (301) 281-1510

PLEASE DETACH THIS PORTION AND RETURN
 WITH PAYMENT OR CORRESPONDENCE

BETTY L LANGREHR
 1640 S. HANDOVER ST
 BALTIMORE MD 21230

75*060451971

HARBOR RADIOLOGISTS, P. A. 7135 WINDSOR BLVD

DATE	CODE	DESCRIPTION	SUMMARY	AMOUNT
09/16/86	72040 3	CERV SPINE 3 VIEWS AP/LAT/ODON	1 @ 28.00	28.00
PATIENT		ACCOUNT NUMBER - PLEASE PRINT ON ALL PAYMENTS AND CORRESPONDENCE		AMOUNT DUE
BETTY L LANGREHR S. BALTIMORE GEN HOSP-ER		75*060451971 52-0893218 PHYSICIAN OF SBGH ER		\$28.00
PLACE OF SERVICE		TAX ID. NO.	REFERRING PHYSICIAN	

- - - W A R N I N G - - -

YOUR ACCOUNT IS SERIOUSLY DELINQUENT. PAYMENT IS DUE IMMEDIATELY.

IF YOU HAVE RECENTLY MADE PAYMENT, DISREGARD THIS NOTICE.

(CHECK ONLY ONE)
 READ INSTRUCTIONS BEFORE COMPLETING OR SIGNING THIS FORM

Form Approved OMB No. 0938-0008

PATIENT & INSURED (SUBSCRIBER) INFORMATION

1. PATIENT'S NAME (First name, middle initial, last name) BETTY LANGREHR		2. PATIENT'S DATE OF BIRTH 01 27 55		3. INSURED'S NAME (First name, middle initial, last name) BETTY LANGREHR	
4. PATIENT'S ADDRESS (Street, city, state, ZIP code) 1640 S HANOVER ST BALTIMORE MD 21230 TELEPHONE NUMBER 528-9197		5. PATIENT'S SEX MALE <input type="checkbox"/> FEMALE <input checked="" type="checkbox"/>		6. INSURED'S I.D. or MEDICARE NO. (Include any letters)	
9. OTHER HEALTH INSURANCE COVERAGE - Enter Name of Policyholder and Plan Name and Address and Policy or Medical Assistance Number NONE		7. PATIENT'S RELATIONSHIP TO INSURED SELF <input checked="" type="checkbox"/> SPOUSE <input type="checkbox"/> CHILD <input type="checkbox"/> OTHER <input type="checkbox"/>		8. INSURED'S GROUP NO. (Or Group Name)	
10. WAS CONDITION RELATED TO A. PATIENT'S EMPLOYMENT YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> B. AN ACCIDENT AUTO <input checked="" type="checkbox"/> OTHER <input type="checkbox"/>		11. INSURED'S ADDRESS (Street, city, state, ZIP code) SAME			
12. PATIENT'S OR AUTHORIZED PERSON'S SIGNATURE (Read back before signing) I Authorize the Release of any Medical Information Necessary to Process the Claim and Request Payment of MEDICARE/CHAMPUS Benefits Either to Myself or to the Party Who Accepts Assignment Below SIGNATURE ON FILE SIGNED _____ DATE 09/16/86		13. I AUTHORIZE PAYMENT OF MEDICAL BENEFITS TO UNDERSIGNED PHYSICIAN OR SUPPLIER FOR SERVICE DESCRIBED BELOW NOT APPLICABLE TO BLUE SHIELD SIGNATURE ON FILE SIGNED _____ (Printed or Authorized Person)			

PHYSICIAN OR SUPPLIER INFORMATION

14. DATE OF ILLNESS (FIRST SYMPTOM) OR INJURY (ACCIDENT) OR PREGNANCY (LMP) 09/16/86	15. DATE FIRST CONSULTED YOU FOR THIS CONDITION	16. HAS PATIENT EVER HAD SAME OR SIMILAR SYMPTOMS? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	16A. IF AN EMERGENCY CHECK HERE <input checked="" type="checkbox"/>
17. DATE PATIENT ABLE TO RETURN TO WORK	18. DATES OF TOTAL DISABILITY FROM _____ THROUGH _____	DATES OF PARTIAL DISABILITY FROM _____ THROUGH _____	
19. NAME OF REFERRING PHYSICIAN OR OTHER SOURCE (e.g., public health agency) S. BALT. GEN. HOSP.		20. FOR SERVICES RELATED TO HOSPITALIZATION GIVE HOSPITALIZATION DATES ADMITTED _____ DISCHARGED _____	
21. NAME & ADDRESS OF FACILITY WHERE SERVICES RENDERED (If other than home or office) S. BALT. GEN. HOSP.		22. WAS LABORATORY WORK PERFORMED OUTSIDE YOUR OFFICE? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> CHARGES _____	

23A. DIAGNOSIS OR NATURE OF ILLNESS OR INJURY RELATE DIAGNOSIS TO PROCEDURE IN COLUMN E BY REFERENCE NUMBER 1, 2, 3, ETC. OR DX CODE 1 723.1 CERVICALGIA 2 E81.9 MV TRAFFIC ACCIDENT NOS 3 E13. P.O (ORAL) NARCOTIC GIVEN IN ER 4 E04. VISIT TO ER BETWEEN 6PM AND 8AM	23B. EPSDT YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> FAMILY PLANNING YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> PRIOR AUTHORIZATION NO. _____
--	--

A DATE OF SERVICE FROM	B PLACE OF SERVICE TO	C T O S	D FULLY DESCRIBE PROCEDURES, MEDICAL SERVICES OR SUPPLIES FURNISHED FOR EACH DATE GIVEN (PROCEDURE CODE (IDENTIFY) (EXPLAIN UNUSUAL SERVICES OR CIRCUMSTANCES))	E DIAGNOSIS CODE	F CHARGES	G DAYS OR UNITS	H. LEAVE BLANK
091686	2		*** ADDITIONAL DIAGNOSIS *** EXTENDED EMERGENCY ACCIDENT TREATMENT	1,2,3 4,5	110 00	01	
091686			CODE... DESCRIPTION... E. 847.0 SPRAIN OF NECK				

25. SIGNATURE OF PHYSICIAN OR SUPPLIER <i>(It certifies that the statements on the reverse apply to this bill and are made a part hereof.)</i> DANIEL CAMPO, M.D. SIGNED _____ DATE 093086	26. ACCEPT ASSIGNMENT (FOR GOVERNMENT CLAIMS ONLY) (SEE BACK) YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	27. TOTAL CHARGE \$110 00	28. AMOUNT PAID 0 00	29. BALANCE DUE 110 00
30. YOUR SOCIAL SECURITY NO.		31. PHYSICIAN'S OR SUPPLIER'S NAME, ADDRESS, ZIP CODE & I.D. NO. HANOVER EMERGENCY SERVICES FOUNDATION, INC. P.O. BOX 13527 BALTIMORE MD 21230		
32. YOUR PATIENT'S ACCOUNT NO. 0000299941 BL CAR		33. YOUR EMPLOYER I.D. NO. 52-1272422		
34. YOUR TELEPHONE NO. 301-337-8150				

PHONE: 760-3777

PHYSICAL THERAPY ASSOCIATES
PATRIOTS PLAZA OFFICE BUILDING
8055 RITCHIE HIGHWAY - SUITE 203
PASADENA, MARYLAND 21122

PAST DUE NOTICE

Payment of this bill is PAST DUE. Please send payment or contact this office regarding the present status of this account.

Physician

Billing Information

Michael S. Propper, M.D.

EMP:

DATE OF ACCIDENT

9-16-86

INS. CO.

DIAGNOSIS

Cervical Sprain

PRESCRIPTION/MODALITIES

ATTY. Daniel Cagan, ESQ.

Therapist Heat, Massage

5 Light Street - S. 800
Baltimore, Maryland

21202

LANGREHR, Betty
1640 South Hanover St.
Baltimore, Maryland
21230

S.S. NO.

213-62-7471

Telephone

Year

1986

STATEMENT OF CHARGES 528-9197

DATE	CHARGE	CREDIT	BALANCE	DATE	CHARGE	CREDIT	BALANCE
9-18-86	55.00		55.00	JUN 30 1987			
9-19	40.00		95.00	DEC 30 1987			
9-24	40.00		135.00	MAY 03 1988	Billed Atty		455.00
9-25	40.00		175.00				
9-30	40.00		215.00	FEB 22 1989	Billed		455.00
10-6	40.00		255.00		Atty J. Feb		
10-14	40.00		295.00	OCT 18 1989	Billed		455.00
10-22	40.00		335.00		Atty J. Feb		
10-24	40.00		375.00	APR 3 1990	Billed Atty		
11-24	40.00		415.00				455.00
1-13-87			455.00	OCT 31 1990	Billed Atty		

NCS	No Significant Change	LS	Lumbar Spine	TK	Trunk
WNL	Within Normal Limits	CS	Cervical Spine	LT	Left
TTP	Tenderness to Palpation	LTD	Limited	RT	Right
ROM	Range of Motion	P	Pain	L	Less
TR	Treatment Rendered	N	Normal	SC	Subjective Complaint
TW	Tolerated Well	LBP	Low Back Pain	OF	Objective Finding
MT	Muscle Tightness	BIL	Bilaterally	LFTD	Limited Few Terminal Degrees
TS	Thoracic Spine	FL	Flexion	c/o	Complains of

MAKE CHECKS PAYABLE TO: PHYSICAL THERAPY ASSOCIATES
FULLER MEDICAL CENTER - SUITE ONE
6918 RIDGE ROAD
BALTIMORE, MARYLAND 21237

I.D.#: 52-1218949

INFORMATION CALL: 687-5040

ANY CORRESPONDENCE SEND TO SAME ADDRESS.

INITIAL EVALUATION

NAME: Betty Langford DOCTOR: Dr. Duggan

D/A: 9/14/86

Patient was seen today for injuries sustained in a MVA, WRA on the above date.

Today the patient is complaining of constant severe neck & left shoulder pain

Objective Findings: Active cervical ROM is markedly limited on all planes due to pain & muscle guarding (25% of normal)
(+) shoulder is restricted to shoulder level due to pain - Very tender to palpation in (+) upper trap. Mus. tightness in upper trap.

Diagnosis: Cervical Strain
(+) Shoulder strain

Plan of Treatment: ↓ pain & improve mobility

- Moist heat
- Massage
- Range of Motion
- Ultrasound
- Cervical Traction
- Exercises
- Whirlpool
- Other home instructions

Out straight RPT

PROGRESS AND DOCUMENTATION NOTES

NAME: Betty Langford

DATES: 9/18/86 See initial eval.

9/19/86 M.L. mag, ROM to neck & shoulder
No change Out straight RPT

9/24/86 Neck painful, better following tx
M.L. mag, etc.
A. Slight improvement
P. Cont tx.

9/25/86 Neck painful
M.L. mag, etc.
A. Some P in ROM still mus. tightness in upper trap
Out straight RPT

9/30/86 M.L. (4.5 added) mag
Out straight RPT

10/4/86 M.L. 4.5 mag
slowly improving

10/7/86 M.L. 4.5 mag - Cont to improve.

10/12/86 D. Neck pain, ...
A. have hand surgery
B. U.S. m.l. may to neck & shoulder
A. Neck & shoulder ROM improving.
3 1/2 of normal rotation

10/22/86 M.L. 4.5 hrs.
TTP in D upper trap had doing well

10/24/86 A. Occasional headache & shoulder pain
but generally better
O.C. ROM normal in flex & ext, rotation
60% of normal. M.L. 4.5 may 4.
A. Improving - Neck tightness in D upper trap
P. Cont.

11/24/86 Returned to Hospital for following
hand surgery. O.S. R.P.

DISCHARGE NOTE

DATE: 11-24-86

PATIENT'S NAME: Betty Langford

D/A: 9/16/86

REFERRING DOCTOR: Mr. Duggan
Dignity Care Home

DESCRIPTION OF PROBLEM The client reports severe constant neck, shoulder pain & headache. Unable to elevate arm above shoulder level. Must sleep sitting up due to severe pain.

TREATMENT

It consisted of manual neck massage, gentle ROM to the shoulder & neck. Ultrasound was added along to passive & active stretching of the tight musculature.

ASSESSMENT

The client was making steady progress with painful symptoms. Cervical & DUF ROM was still restricted but markedly improved since initial eval. Muscular tightness in the Dupper trap was decreased. The client was involved in another MVA on 11/24/86.

DISPOSITION

The client was involved in another MVA on 11/24/86.

Pet Knight
PHYSICAL THERAPIST

(4)

BETTY LANGREHR

Appellant

vs.

EPHRAIM HOBBS

Appellee

FILED
AUG 15 1990
CIRCUIT COURT FOR
BALTIMORE CITY

IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

Case: 90215022/
CL117523

* * * * *

REQUEST FOR ORAL ARGUMENT

Betty Langrehr, Appellant, by Daniel W. Cagan, her attorney, respectfully requests that this case be set for Oral Argument before the Court.

Daniel W. Cagan
1 E. Lexington Street, Suite 201
Baltimore, Maryland 21202
(301) 727-5565

Attorney for Appellant

CERTIFICATION OF MAILING

I HEREBY CERTIFY that on this 15th day of August, 1990, a copy of the foregoing Request for Oral Argument was mailed to David B. Ginsburg, Esquire, 6708 Alexander Bell Drive, Columbia, Maryland 21046.

Daniel W. Cagan

(3)



CIRCUIT COURT FOR BALTIMORE CITY
CIVIL DIVISION

Room 462 Court House East
111 N. Calvert Street
Baltimore, Md. 21202

SAUNDRA E. BANKS,
Clerk

General Information (301) 333-3700
Law (301) 333-3711
Equity (301) 333-3722

CASE NUMBER 90215022/CL117523

BETTY LANGREHR

VS

APPELLANT

EPHRAIM HOBBS

APPELLEE

*
*
* DANIEL W. CAGAN, ESQ.
* 1 E. LEXINGTON STREET, SUITE 201
* BALTIMORE, MD 21202
*
* ATTORNEYS FOR APPELLANT
*
*
* DAVID B. GINSBURG, ESQ.
* 6708 ALEXANDER BELL DR.
* COLUMBIA, MD 21046
*
*
* ATTORNEYS FOR APPELLEE
*

STATE OF MARYLAND,

I HEREBY CERTIFY, That on the 3rd day of AUGUST Nineteen Hundred and NINETY, I received from the Clerk of the District Court of Maryland, District NO.1, located at Baltimore City, Original Papers and Transcript of Testimony in the above entitled case.

MAILED: 8/7/90

Sandra E. Banks
SAUNDRA E. BANKS, CLERK
CIRCUIT COURT FOR BALTIMORE CITY

NOTICE TO COUNSEL

Requests by counsel for Oral Argument shall be filed with the Clerk of the Appellate Court within ten (10) days after the filing of the Transcript of Testimony, otherwise the Appeal will be decided without Argument, unless the Court requests Argument.

CPD

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IN THE DISTRICT COURT FOR BALTIMORE CITY

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BETTY LANGREHR

VS

CASE NO. 29217-89

EPHRAIM HOBBS

*Is Q of
prox C. ~
factual are?
part damages an
element?*

The above captioned case came on
for trial on May 2, 1990

BEFORE:

The Honorable Andre M. Davis

APPEARANCES:

Daniel Cagan, Esquire
(for the Plaintiff)

David Ginsburg, Esquire
(for the Defendant)

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P R O C E E D I N G S

1

COURT: Good afternoon.

2

COUNSEL: Good afternoon, Your Honor.

3

4

COUNSEL: Good afternoon, Your Honor.

5

COURT: Be seated.

6

CLERK: 29 21789. Betty Langrehr versus

7

Ephraim Hobbs.

8

COUNSEL: I think my client is just outside
the door, Your Honor.

9

10

COURT: Okay.

11

COUNSEL: Thank you.

12

MR. CAGAN: Daniel Cagan on behalf of the
Plaintiff, Your Honor.

13

14

COURT: Mr. Cagan.

15

MR. GINSBURG: David Ginsburg, Your Honor.
Good afternoon. On behalf of --

16

17

COURT: Are we ready to proceed?

18

MR. GINSBURG: Yes, we're ready to proceed,
Your Honor.

19

20

COURT: Okay.

21

MR. CAGAN: There are two, I think, basic
preliminaries, Your Honor.

22

23

Number one is that the parties have agreed
that the Plaintiff may introduce and proffer the

24

25

1 medical reports and bills as well as -- I think -- the
2 property damage estimate into evidence without the
3 necessity of having to bring the medical care suppliers
4 or the person who made the estimate of the property
5 damage into Court to personally testify.

6 Of course, the Defense will reserve the right
7 to question those as to causal connection, as to
8 necessity and that type of thing.

9 The Plaintiff is agreeing that she is not
10 claiming that she is permanently injured as a result of
11 this accident. She is also not going to claim that she
12 suffered past the date of her last medical treatment as
13 a result of this accident.

14 COURT: Very well.

15 MR. CAGAN: The only other thing -- and, Your
16 Honor, I would pass these forward to have them marked
17 as Plaintiff's Exhibits in this case.

18 The only other thing that I would ask, Your
19 Honor, is that the witnesses be sequestered in this
20 case.

21 COURT: Alright.

22 MR. CAGAN: Except, of course, the Defendant
23 and the Plaintiff.

24 COURT: All the witnesses are in the
25 courtroom?

1 MR. CAGAN: Yes.

2 (All to testify are sworn)

3 COURT: Alright.

4 MR. CAGAN: You can't discuss it with anybody
5 out in the hallway. You can't discuss it with this
6 gentleman. Okay. Just step out in the hallway. There
7 are some seats out there, and wait until you're called.

8 COURT: Just step out in the hallway, please,
9 sir.

10 You can be seated, Mr. Hobbs.

11 You --

12 MR. GINSBURG: Your Honor --

13 COURT: Ms. Langrehr, if you would take the
14 stand, please?

15 MR. GINSBURG: Your Honor, in regard to the
16 bills that was -- that were submitted. There was no
17 agreement --

18 MR. CAGAN: It was done by State Farm like
19 that. Okay. If you don't want to do that, then, you
20 know -- it's up to you --

21 MR. GINSBURG: Well --

22 MR. CAGAN: You're (unclear comments --
23 whispering) I mean, we're not asking for the damages.
24 That's just for the Judge to see.

25 MR. GINSBURG: Alright. Will you stipulate

1 that these were the photographs that were taken shortly
2 after the accident that (unclear) --

3 MR. CAGAN: Just let me ask -- now this was
4 (unclear), right?

5 MR. GINSBURG: Yeah. That's not the --
6 (unclear)

7 MR. CAGAN: That's all I wanted to know.
8 Okay. Fine.

9 MR. GINSBURG: Okay.

10 MR. CAGAN: As long as it goes into the
11 property damage estimate. I have no problem with that
12 at all.

13 MR. GINSBURG: Alright.

14 And the other thing, Your Honor, is that in
15 Answers to Interrogatories, we were advised that the
16 bill of Doctor Proffer (phonetic) was two hundred and
17 ninety dollars.

18 MR. CAGAN: I think that was a -- that may
19 have been a typo error, Your Honor. Ah -- I've got no
20 problem with that. Except that the actual bill was
21 three hundred dollars, and it's ten dollars difference.

22 I think it was just -- the top bill with
23 their --

24 COURT: Okay.

25 MR. CAGAN: Your Honor, I don't think there's

1 any necessity for an opening statement. I would --

2 COURT: Certainly.

3 MR. CAGAN: Since my witness is already sworn
4 in.

5 Whereupon,

6 BETTY LANGREHR

7 was called as a witness on behalf of the
8 Plaintiff, and having been sworn, was
9 examined and testified as follows:

10 DIRECT EXAMINATION

11 MR. CAGAN:

12 Q: Mrs. Langrehr, would you state your full
13 name and your current address for the Court?

14 Please keep your voice up because this
15 microphone doesn't make your voice louder. It simply
16 records what we say.

17 MRS. LANGREHR:

18 A: Okay. My name is Betty Langrehr. And I
19 live at 1523 Clarkson (phonetic) Street.

20 Q: Okay. Are you married at the present
21 time?

22 A: Yes.

23 Q: And your husband is the other witness in
24 this case?

25 A: That's --

1 Q: Is that correct?

2 A: That's right.

3 Q: Okay. Now, I'm going to ask you to step
4 up to this magnetic board if you could. And I'm going
5 to ask you to use this red car as your automobile. I'm
6 going to ask you to use the yellow truck here as Mr.
7 Hobbs' van.

8 Now, I'm going to ask you to position these
9 cars just as they were before the accident occurred.

10 And, now, you were on what street on
11 September sixteenth, 1986?

12 A: It was at Reedbird Avenue. Here at the
13 red light.

14 Q: And it's Reedbird Avenue at what
15 intersection? What is the cross street?

16 A: Hanover Street.

17 Q: Okay. Fine. Now, I would like you to
18 tell His Honor exactly what occurred on that date at
19 that intersection between the vehicle you were in and
20 Mr. Hobbs' vehicle.

21 A: Well, we were sitting at the -- we had
22 came from up this way and turned down Reedbird Avenue,
23 going to the hospital to see a friend of mine. And we
24 got stopped at a stop light, and we were sitting there

25 --

1 Q: Maybe you could turn -- I see you may be
2 blocking His Honor's point of view.

3 COURT: Yeah. That's better.

4 MRS. LANGREHR: We was sitting at a red
5 light, and --

6 MR. CAGAN:

7 Q: Okay --

8 MRS. LANGREHR:

9 A: And it was around traffic rush hour, and
10 this truck come around sharply turning and hit the left
11 side of my car. Which I got really bad nerves. I
12 started getting really shook. I didn't even go over to
13 see my friend or nothing. I just told --

14 Q: Okay. Well, let's stop for a minute.
15 You're racing a little bit ahead of yourself.

16 Okay. Now, let's go back a little bit. You
17 say you were sitting at a red light?

18 A: Right here at a red light.

19 Q: Okay. Immediately before contact between
20 your car and Mr. Hobbs' van, did the car that you were
21 in move at all from its standing, stopped position.

22 A: No, it just jarred it. Shook it.

23 Q: Okay. I mean, before the collision, did
24 your vehicle move?

25 A: No.

1 Q: Did it go into the intersection at all
2 before the collision?

3 A: No. We were at a complete stop at a red
4 light.

5 Q: Now, as a result of the collision, what
6 part of your vehicle made contact with what part of Mr.
7 Hobbs' van?

8 A: It was his left hitting our left. Like
9 that. That's how it happened.

10 Q: Now, as a result of the contact between
11 your two -- between your automobile and Mr. Hobbs' van,
12 what physically happened to your body at that time?

13 A: I got threw (phonetic) back and forth,
14 and then -- and then, of course, I was all upset. So
15 Frank called the police, I believe Frank did it, me or
16 him. Went and, you know, the police --

17 COURT: Ms. Langrehr, you can have a seat.

18 MR. CAGAN: Okay. Have a seat, ma'am.

19 COURT: Okay. And --

20 MRS. LANGREHR: And it was all on the --

21 COURT: Just listen to the question. Just
22 answer the question.

23 MRS. LANGREHR: Okay.

24 COURT: That you're being asked. Okay. I
25 know you're a little nervous now, right? That's okay.

1 Just listen to the question.

2 MRS. LANGREHR: Okay.

3 COURT: And answer the questions that he has.

4 MRS. LANGREHR: Alright.

5 MR. CAGAN:

6 Q: Okay. Did you stay at the scene for a
7 little while?

8 MRS. LANGREHR:

9 A: Um-hm.

10 Q: Okay. Did Mr. Hobbs make contact with
11 you personally at the scene?

12 A: Yeah. He got out of his truck, and he
13 asked us was every -- was we okay. And he said, look,
14 hon, I'm really sorry. Are you okay? And I said,
15 yeah, I think so. And then I told Frank, my husband, I
16 said --

17 COURT: Ms. -- Ms --

18 MRS. LANGREHR: Okay.

19 MR. CAGAN:

20 Q: And from that point on --

21 COURT: Just answer the question.

22 MR. CAGAN:

23 Q: From that point on, how did you feel at
24 that time? While you were at the scene?

25 MRS. LANGREHR:

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A: All --

Q: How did you physically feel?

A: All shook up.

Q: Where did you go -- you exchanged information at the scene?

A: Yes.

Q: From the scene, where did you go to?

A: I went home.

Q: How long did you stay at home?

A: About an hour or so.

Q: Then what did you do?

A: I went and laid down, and I started to get a bad headache. And I thought -- my neck, the back of my neck started hurting. So I told Frank to take me on over to the hospital.

Q: As a result of this, what did you do?

A: I went to the hospital.

Q: What hospital did you go to?

A: Harbor Medical Center.

Q: Okay. Which is -- at that time, was South Baltimore General Hospital --

A: That's right --

Q: Before it changed its --

A: Um-hm.

Q: Is that correct?

1 A: That's right.

2 Q: Okay. How far is that from where you
3 live?

4 A: About a mile. If that.

5 Q: Do you know approximately how many hours
6 it was between the time the accident occurred and the
7 time you actually got to the hospital?

8 A: It was, like, in about a hour, a hour and
9 a half. Altogether.

10 Q: When you got to the hospital, how were
11 you feeling at that time?

12 A: My neck was hurting, and I was starting
13 to get a real bad headache.

14 Q: You can't say what they told you at the
15 hospital, but I'm going to ask you to describe for His
16 Honor exactly what they did to you or for you at the
17 hospital. Go slowly.

18 A: They put a thing up around my neck and
19 they sent me for x-rays. And they gave me a pain shot.
20 And, ah, they gave me a prescription to take, and they
21 told me to go on home, and to rest.

22 Q: Now -- what -- approximately what time
23 did you get home? Do you remember?

24 A: No. It's been four years.

25 Q: What did you do when you got home?

1 A: I went to bed.

2 Q: The next day, how were you feeling when
3 you woke up?

4 A: The same way. I still had the constant
5 headache. I had been up that night, taking the pills
6 that the doctor had given me, and Tylenol and so --
7 then I still felt lousy. So then I -- so I had this
8 bad headache, and it worries me, because I got bad
9 nerves anyway. And I had went down to see Dr. Proffer.

10 Q: You had used Dr. Proffer before, is that
11 correct?

12 A: That's right.

13 Q: What did you first use Dr. Proffer for?

14 A: My hand was crushed.

15 Q: Okay. So you used him for a work related
16 injury treatment. Is that correct?

17 A: That's correct.

18 Q: Okay. Now, what did Dr. Proffer do to
19 you or for you when you got to his office?

20 A: He took an x-ray. Ah, and I -- and they
21 -- they would rub it, and they put this ultrasound
22 thing on my neck --

23 Q: I'm talking about that day. The first
24 day you got to him regarding this.

25 A: It's been four years ago. The only thing

1 that I can remember that they did was they used the
2 ultrasound, and heat pad, and he just tried to turn my
3 neck, and, you know, just asked me what side it --
4 where it hurt, and how far I could turn it, and, you
5 know, and stuff like that.

6 Q: Did he take any special measures, if at
7 all, with regard to your headaches?

8 A: Yeah, he sent me to another Doctor, right
9 there in his office --

10 Q: Dr. Young (phonetic)?

11 A: Dr. Young.

12 Q: Okay. And what did Dr. Young do to you
13 or for you?

14 A: He prescribed the medication to take. I
15 think he sent me for tests, but I can't remember.

16 Q: Okay. And this was after examining you.
17 Is that correct?

18 A: Um-hm.

19 Q: Now, did there come a time when you did
20 some physical therapy?

21 A: Right. And that's when they used the
22 ultrasound and rubbed it.

23 Q: And how long did that continue for?

24 A: A couple of months.

25 Q: Okay. Was that into November?

1 A: Probably. Yes.

2 Q: Okay. That ended abruptly, did it not,
3 November the twenty-fourth?

4 A: That day. Yeah, right.

5 Q: You're quite aware of that day?

6 A: Oh, yeah.

7 Q: Is that correct?

8 Your Honor, I'll proffer for the Court,
9 because I think it's a matter of the record that on
10 November the twenty-fourth, this young lady was in a
11 horrible accident where a vehicle crossed a cement
12 median strip and landed on top of her car, causing her
13 to be hospitalized in the shock trauma unit for many
14 weeks. So that's one of the reasons that we're saying
15 that her complaints are ending as of the date of her
16 last treatment.

17 Now, ah -- you continued with your physical
18 therapy to that time? Is that correct?

19 A: That's correct. I was on my -- yeah.

20 Q: Did your condition steadily improve while
21 you were going to physical therapy?

22 A: I -- I guess. It's been too long ago.
23 It's been four years.

24 Q: But it is fair to say that the other
25 accident was so horrendous, and so traumatic to you --

1 A: Right.
2 Q: That it overshadowed anything?
3 A: Right.
4 Q: With regard to this accident.
5 A: That's right.
6 Q: Is that correct?
7 A: That's correct.
8 Q: Okay.
9 Witness with you.

CROSS EXAMINATION

10
11 MR. GINSBURG:
12 Q: When did you -- when did you crush your
13 hand?

14 MRS. LANGREHR:
15 A: Ah, I believe that was on September the
16 fourth, 1986.

17 Q: Tell me about that. What happened?

18 A: I was working, and they had had new steel
19 racks put in. And, ah -- I was wrapping a bag around
20 these steel racks when I --

21 Q: Where were you working?

22 A: Farm Fresh.

23 Q: At a convenience store?

24 A: Yeah.

25 Q: Okay.

1 A: Grocery store.

2 Q: Okay. Grocery store. You were wrapping
3 these bags around the --

4 A: I was wrapping a plastic bag around this
5 rack, and this older gentleman -- it was like on check
6 day, and things was kind of moving -- they wanted them
7 to move fast. And my boss was standing right there,
8 taking the groceries from this older man, putting them
9 on to this belt, and I was wrapping around the thing,
10 trying to hurry, like he wanted me to do. And he was
11 standing right there. And as I wrapping there, the
12 elderly man got the part stuck up here, and he shoved
13 it. And when he did, he shoved the cart -- my hand was
14 between the steel rack and the -- the steel rack and
15 the cart. And my hand got crushed in between the cart
16 and the steel rack.

17 And the boss seen it happen, come out and
18 yanked the rack. And when he did, my -- it kind -- it
19 messed my hand up real bad.

20 Q: Okay. I noticed you were pointing to
21 your left hand while you were talking.

22 A: That's right. It still bothers me.

23 Q: And I also notice that you have it
24 wrapped. Is that --

25 A: And I've also had two operations on it

1 and it's still in real bad shape.

2 Q: Did you also injure you knee or something
3 at that time?

4 A: That was in the serious accident,
5 November twenty-fourth. That's when I was taken to
6 shock trauma.

7 Q: Okay. The reason -- the reason I ask is
8 because on your Interrogatory Answers, you indicated
9 that on the -- the September fourth accident, you had
10 injured your hand and your knee.

11 A: Oh, no. That's where I was trying to
12 explain that I had -- it said, where do you have
13 injuries, and I said -- previous injuries, and I said,
14 to my hand. And then -- afterwards, it said -- and
15 then I said, to my knee.

16 Q: Okay. I -- let me read this to you.

17 A: Go ahead.

18 Q: On September fourth, 1986, I was involved
19 in a work related accident. I sustained injuries to my
20 left knee --

21 A: No --

22 Q: And left hand.

23 A: That's written incorrectly. I sustained
24 injuries only to my hand in the work related accident.
25 The -- ah -- my knee came from the real bad accident,

1 where the car come across the median strip.

2 Q: Okay. So you never injured your -- your
3 knee or your leg until November the twenty-fourth?

4 A: That's correct.

5 Q: Okay. Now, as a result of injuring your
6 hand, were you treated at the -- at any hospitals?

7 A: Yeah.

8 Q: Okay.

9 A: I've been operated on --

10 Q: Okay. Well, tell me on the -- on the day
11 that you had your hand crushed what happened?

12 A: They sent me -- they applied ice to it
13 right away. And, ah, they told me I'd better get right
14 to the hospital because it was like a bone sticking out
15 of my skin.

16 Q: Did you go to a hospital?

17 A: I think I went to Mercy.

18 Q: Mercy. Did they keep you there?

19 A: No. They took x-rays and all, and told
20 me I'd better get to a surgeon.

21 Q: Okay. And did you go to a surgeon?

22 A: Ah, yeah.

23 Q: Who did you go to?

24 A: Dr. Michael -- that's when I was
25 introduced to Dr. Michael Proffer.

1 Q: Okay. So you were already under Dr.
2 Proffer's care --

3 A: That's exactly right.

4 Q: At the time of this accident?

5 A: That's exactly right.

6 Q: Okay. And also, from the time that you
7 had had your hand crushed at work, you had not returned
8 to work? Isn't that true?

9 A: That's true.

10 Q: Okay. So you were not working at the
11 time of this accident?

12 A: No. That's right.

13 Q: And you were under Dr. Proffer's care at
14 the time of this accident?

15 A: That's right.

16 Q: Okay. Between when you first had your
17 hand crushed, and, say, the time that this accident
18 that we're here to talk about --

19 A: Um-hm?

20 Q: What sort of treatments did Dr. Proffer
21 have, or did he do, or did he refer you to, or what
22 have you?

23 A: Well, he had worked on my hand with the
24 ultrasound and taken x-rays and whatnot. And then he
25 kept telling me that it had to have surgery. It wasn't

1 going to get better. But I kept saying, well, I'd
2 rather -- I would like to try to get it better without
3 all that. Because I don't like to be cut on, and -- I
4 just kept saying, I'd rather have the ultrasound, that
5 it might get better.

6 And he said, it's not going to get any
7 better. And so, finally, he operated on it --

8 Q: Okay. Now, this ultrasound -- was this
9 administered by Dr. Proffer, or was this someone else
10 in his office that was doing it?

11 A: Dr. Proffer.

12 Q: Dr. Proffer himself?

13 A: A lot of times. A lot of times it was
14 him, and sometimes, a girl.

15 Q: Okay. Some -- some girl that worked in
16 his office?

17 A: Right.

18 Q: Okay. Was this done in the same room or
19 area where you later had physical therapy following
20 this accident?

21 A: Right, um-hm.

22 Q: Okay. So it was basically the same
23 physical therapy area that -- that you later learned of
24 following this accident?

25 A: That's right.

1 Q: So would it be fair to say, then, that
2 you were undergoing physical therapy at the time that
3 you were involved in this accident?

4 A: Was I going to the Doctor already, for my
5 hand?

6 Q: Yeah.

7 A: Yeah.

8 Q: And you were undergoing physical therapy
9 at that time, too.

10 A: For my hand.

11 Q: Okay. But it was physical therapy.

12 A: Right.

13 Q: Okay. How many times had you been there
14 for physical therapy, would you say?

15 A: For my hand?

16 Q: Um-hm.

17 A: I don't know.

18 Q: Well --

19 A: I can't remember back that far. We're
20 talking about four years ago, hon.

21 Q: Okay. I realize that. At the time -- at
22 the time of the accident, were you on medications for
23 your hand?

24 A: Pain medication.

25 Q: Okay. I imagine -- I imagine it was

1 causing you pain as soon as it happened --

2 A: Right.

3 Q: And isn't it true that it was still
4 causing you pain, even up until the day of this
5 accident, and probably long past this accident?

6 A: That's right.

7 Q: Okay. Was Wyegesic (phonetic) one of the
8 pain medications that you were taking?

9 A: It's possible.

10 Q: Does that sound familiar to you?

11 A: I don't remember.

12 Q: Okay. I ask you that because, according
13 to the emergency room records at South Baltimore, they
14 say that you were taking Wyegesic.

15 A: That was probably right. That was pain
16 medicine for my hand. I probably was taking it.

17 Q: Okay. Were you taking any other
18 medication at that time?

19 A: No, I don't think so. Other than
20 Tylenol. I take Tylenol a lot when something bothers
21 me.

22 Q: Do you remember when you were first
23 prescribed the Wyegesic that you were warned about it
24 causing drowsiness or what have you, and that you
25 shouldn't drive?

1 A: I don't remember.

2 Q: No? You don't remember that?

3 A: No.

4 Q: Do you remember whether it did cause you
5 drowsiness or not?

6 A: No. Nothing makes me sleepy.

7 Q: Okay. Do you remember taking a drug
8 called Augmentin (phonetic)?

9 A: I don't remember.

10 Q: Have you ever heard of the drug?

11 A: Probably. If I put -- if it says down
12 there I took it, I probably took it.

13 Q: Okay. And -- again, the reason I ask you
14 that again is because that was also listed on the top
15 of the --

16 A: That was probably pain medication or what
17 not for my hand.

18 Q: Okay -- so you were on two different
19 types of pain medications?

20 A: Probably.

21 Q: Okay, because the Wyegesic was a pain
22 medication, too, I think you'd said?

23 A: Probably. I don't know.

24 Q: Okay. Isn't it true that -- that
25 following your hand injury, that you were also having

1 headaches?

2 A: Having headaches?

3 Q: Yeah. Did you have any headaches
4 following your hand injury?

5 A: I don't think so.

6 Q: Okay. You don't remember having
7 headaches or not?

8 A: No, I don't remember.

9 Q: You may have or may not? You just don't
10 remember because it's been four years or so?

11 A: Yeah. It's been so long ago. I don't
12 think I had headaches because of my hand injury,
13 though.

14 Q: Okay. Do you remember on
15 Interrogatories, though, being asked whether you had
16 taken any medication within eight hours of the
17 accident? Do you remember being asked that question?

18 A: On the papers I just received a couple
19 months ago on -- the ones I (unclear comments)?

20 Q: Yeah. The ones you and your attorney
21 went over?

22 A: That might have -- that might have said
23 that, I don't know.

24 Q: Is there any reason that -- that you
25 didn't tell me at that time that you were on two

1 different kinds of pain medication for your hand?

2 A: When I --

3 MR. CAGAN: I'm going to object to the form
4 of the question, Your Honor. Basically, the question
5 is within eight hours. Now, he hasn't asked her
6 whether or not she actually took any within eight
7 hours.

8 COURT: Okay.

9 MR. GINSBURG:

10 Q: Had you taken any of your pain medication
11 before this accident occurred?

12 MRS. LANGREHR:

13 A: No. I usually took it at night time so I
14 could sleep.

15 Q: So you were only taking medication at
16 night? Is that what you're -- is that what you want me
17 to believe?

18 A: I -- it bothered me most -- it bothered
19 me the most at night time, hon. Because I had it up in
20 a --

21 Q: So you --

22 A: A cast, I mean, a sling, most of the day
23 --

24 Q: So you --

25 A: If it bothered me, I took a pill. If it

1 didn't -- if it wasn't aching me real -- I don't like
2 to take pills of any type. And I -- something really
3 has to be bothering me an awful lot before I take
4 medicine because I don't believe in taking pills. I
5 take Tylenol most of the time, and that's about it.

6 Q: Now, at the time that you first went to
7 the emergency room, isn't it true that the only
8 complaints that you had was about an injury to your
9 neck?

10 A: That's right.

11 Q: Okay. Well, why didn't you tell them
12 that you were having this -- this pain in your hand?
13 Or that you injured your hand?

14 A: I never injured my hand in that -- in
15 that -- in this car accident.

16 Q: Well, were you being treated?

17 A: They could clearly see that my hand was
18 injured. It was in a -- it was being taken care of. I
19 never hurt my hand in this accident. My hand was work
20 related.

21 Q: My question was -- I thought my question
22 was -- about -- had to do with the complaints you were
23 having at the time you were treated at the emergency
24 room.

25 A: I went to the emergency room --

1 Q: Now, my question is, were you having any
2 complaints about your hand at that time?

3 A: No. I told them that my neck -- I had
4 been in a accident about a hour ago, and when I went
5 home, I started getting my -- my neck is stiffening up,
6 and I'm getting a terrible headache.

7 Q: Okay. So this -- this hand that you had
8 crushed two weeks before the accident wasn't bothering
9 you enough to mention it to the emergency room staff?

10 A: I'm not going to sit here and tell you my
11 hand don't bother me. My hand, up to today, bothers
12 me.

13 Q: Well, we're talking about --

14 A: But I never went to the hospital for my
15 hand. I went because I was getting a bad headache, and
16 my neck was stiffening up and I was scared.

17 Q: Well, isn't it true that you never
18 mentioned anything about a headache to the emergency
19 room staff at South Baltimore General Hospital?

20 A: I'm pretty sure I did mention a headache,
21 because that's why I really went. My head started
22 busting, and I had taken a Tylenol, and it wouldn't go
23 away. And I got upset, and I told my husband, I think
24 you'd better take me to the hospital. I got a real bad
25 headache, and my neck feels like it's stiffening up.

1 Q: Well, I'm looking at the bottom of the
2 emergency room sheet, next to your signature, that asks
3 for a description of accident or illness --

4 A: Um-hm?

5 Q: And typed in, it says, patient states she
6 has injury to neck.

7 A: Um-hm?

8 Q: And there's no mention of headache, or --
9 or anything else.

10 A: Well, that's their negligence for not
11 writing it down there. It's certainly not mine,
12 because that's what I went for -- my neck, and I had a
13 bad headache.

14 Q: Well, could it be possible that you
15 didn't have any complaints of a headache at that time?

16 A: No. Because that's why I went to the
17 hospital. My neck was stiffening up, and I started to
18 get a bad headache. That's why the next -- when it --
19 it kept it up, the next day and the day after that, I
20 went down to see Dr. Proffer to see why it was still
21 doing it.

22 And then referred me to Dr. Young because he
23 -- I kept complaining of headaches.

24 Q: When was it that you saw Dr. Proffer?

25 A: I don't remember.

1 Q: Well -- was it the day following the
2 accident?

3 A: I don't remember.

4 Q: Was it the week following the accident?

5 A: I don't remember.

6 Q: Could it --

7 A: It would be right there on the records
8 that you got in front of you.

9 Q: So other than the records of Dr. Proffer,
10 you have no recollection, then, when you went in --

11 A: It's been too long.

12 Q: Okay.

13 A: I can't remember from one day to the
14 next, it's been four years ago.

15 Q: Okay. But you expect me to believe that
16 you can remember what you told the emergency room
17 doctor, but you can't remember when you next saw Dr.
18 Proffer. Is that correct?

19 A: Certainly I expect you to believe that.
20 That's why I went to the hospital.

21 Q: Okay.

22 A: I can't remember from one day to the next
23 four years ago, but I certainly remember why I went to
24 the hospital.

25 Q: Isn't it true that according to the

1 emergency room record that you had no complaint of
2 shoulder pain?

3 A: I don't know. I might not have had, I
4 might have had.

5 Q: Okay. Well, did you have complaints of
6 shoulder pain or didn't you?

7 A: Well, my neck is right here at the
8 shoulder. And I still have a problem with that, also.
9 I go to my doctor, I've been going to my doctor for the
10 past couple years.

11 But I'm not saying that the shoulder could
12 have happened from this accident. It could have been
13 from the real bad accident, when I was taken to Shock
14 Trauma.

15 I'm not saying that. I don't go saying
16 something that -- that's not true.

17 Q: Okay. That's -- well, that's -- I'm just
18 trying to keep this all straight, because you've had
19 three accidents --

20 A: That's right.

21 Q: Three major accidents --

22 A: That's exactly right.

23 Q: Within a period of approximately two
24 months.

25 A: And they were the only accidents in my

1 whole life --

2 Q: Okay. Where --

3 A: And they all happened together.

4 Q: Well, the reason I'm trying to get it all
5 sorted out -- because we're sitting here now, almost
6 four years after the accident, trying to -- trying to
7 recall what --

8 A: What happened then --

9 Q: What complaints you had --

10 A: Exactly.

11 Q: From which accident.

12 A: I can recall what complaints I had at
13 what time.

14 Q: Okay. But you're saying that any
15 shoulder complaints might have been attributable to the
16 second accident?

17 A: It's possible.

18 Q: Okay. So you're not having any shoulder
19 complaints now that you can tell me are from the
20 automobile accident that we're here discussing?

21 A: No.

22 Q: Okay.

23 After -- strike that. Where in the vehicle
24 were you sitting at the time of the accident?

25 A: In the passenger seat. The front.

1 Q: Now, as a result of the accident, did any
2 part of your body strike any part of the inside of the
3 car?

4 A: No. Just shook up. Thrown up and all.

5 Q: Okay -- just -- you leaned forward in
6 your chair and leaned back for me. Is that --

7 A: Well, I kind of went forward and back,
8 but I didn't strike anything, no.

9 Q: Okay. Now, as a result of the accident,
10 was the vehicle that you were in moved at all by Mr.
11 Hobbs' van? Was it pushed backwards or sideways or --

12 A: It might have been pushed a little to the
13 side.

14 Q: Okay.

15 A: I don't know. I don't think so. I don't
16 know.

17 Q: Okay. Do you remember, following the
18 accident, whether you had gotten out of the car at any
19 time?

20 A: I don't know --

21 Q: Well --

22 A: I can't remember if I got the police or
23 if my husband got the police. I think I spotted the
24 police over on the parking lot, and I was all upset and
25 --

1 Q: Okay. Well, you were right across the
2 street from Southern District when this happened,
3 weren't you?

4 A: No -- there was a police -- yeah, right.
5 But there wasn't any police cars there. But across the
6 street at the hospital parking lot, I spotted a police
7 or my husband did. One of us did.

8 Anyway, one of us got the -- brought the
9 police over to the accident. That's right.

10 Q: Where was your attention focused at the
11 time of the accident?

12 A: Waiting at the red light. Waiting for
13 the red light to change so I could go over to the
14 hospital because I'd been promising my girlfriend that
15 I was going to come.

16 Q: Okay. Do you remember any activity going
17 on in front of the police station on your left, in
18 front of the Southern District -- Southern District
19 Police Station?

20 A: No.

21 Q: You don't remember them raising a statue
22 or something like that? And doing some type of
23 construction?

24 You have to give me a verbal answer.

25 A: No.

1 Q: Okay. You don't remember any activity at
2 all in front of the police station?

3 A: No. Just sitting at a red light.

4 Q: Alright. Now, as you were approaching --

5 A: In fact, we were past the police station.

6 Q: As you were approaching the intersection
7 of Hanover Street, as you were pulling up to it, what
8 color was the traffic signal when you first saw it?

9 A: When we stopped?

10 Q: No. When you first saw the light, before
11 you got to the intersection?

12 A: It was red. So we stopped.

13 Q: It was red the entire time you were
14 there?

15 A: That's right. And it was a real long red
16 light, because we were sitting there a minute. I
17 remember saying, I wish the damn light would change.
18 But it's a long red light.

19 Q: But you remember sitting there before the
20 accident occurred?

21 A: We were sitting there -- yeah. A couple
22 of minutes. Because I remember saying, Frank, this is
23 a long red light. And we were sitting there for a
24 while before this truck turned in --

25 Q: Following this accident, do you remember

1 observing the front of your vehicle or your husband's
2 vehicle and noticing any damage?

3 A: After the accident?

4 Q: Yeah. Do you remember any car damage at
5 all?

6 A: Yeah. The grille was cracked, and, ah --
7 something was the matter with the fender. I can't
8 remember, though.

9 Q: Okay. How about -- how about the
10 headlights? Were they intact?

11 A: Right. I think they were. Um-hm.

12 Q: Okay. Your Honor, Plaintiff already
13 stipulated to these photographs. I'd like to admit
14 them at this time.

15 COURT: Okay. Defendant's One - A and
16 One - B.

17 (Defendant's Exhibits Numbers 1 - A and 1 - B,
18 Entered and Received)

19 MR. GINSBURG:

20 Q: Who was driving the vehicle that you were
21 in?

22 MRS. LANGREHR:

23 A: My husband.

24 Q: And how long have you been married?

25 A: Twelve years. And for the record, my

1 husband has never had an accident.

2 COURT: Defendant's One and Two are
3 photographs of the Plaintiff's vehicle immediately
4 after the accident?

5 MR. GINSBURG: Yes, sir, Your Honor.

6 COURT: Okay.

7 MR. GINSBURG: That's the condition of the
8 vehicle immediately following the accident.

9 COURT: Okay.

10 MR. CAGAN: I take it those were done in
11 conjunction with the estimate of damage that was
12 written?

13 MR. GINSBURG: I -- that's what I would
14 assume, Your Honor.

15 MRS. LANGREHR: Um-hm.

16 MR. GINSBURG:

17 Q: Did you have any trouble keeping your
18 appointments with Dr. Proffer following this accident?
19 Were you able to keep them all?

20 MRS. LANGREHR:

21 A: I might not have kept them all, but I
22 kept most of them.

23 Q: Were -- were you able to do all of the
24 exercises and everything that he ordered you to --

25 A: Whatever he told me to do, I tried my

1 best to do.

2 Q: Okay. And except for not taking
3 medications, because you say that you don't like to do
4 that, was there anything else --

5 A: I took them when it -- when things really
6 bothered me.

7 Q: Well, was there anything else that the
8 Doctor instructed you to do that you were unable to do
9 or didn't do?

10 A: Not that I remember.

11 Q: You told me at the hospital, they
12 instructed you to wear some type of a whiplash collar.

13 A: Something around my neck, yes.

14 Q: Well, how -- how long did you wear that
15 for?

16 A: I guess about a week or two.

17 Q: Were you supposed to be wearing it at the
18 time that you first saw Dr. Proffer?

19 A: I did wear it to his office.

20 Q: Well, can you tell me why, according to
21 Dr. Proffer's records, there's no indication that you
22 were wearing a collar?

23 A: I don't know.

24 Q: How about when you saw Dr. Young? Were
25 you supposed to be wearing it then?

1 A: I don't know. At the hospital, they told
2 me to keep it on for about a week and just take it off
3 and see if it felt any better --

4 Q: Oh. And --

5 A: But it never felt any better.

6 Q: Did they tell you to keep it on, or did
7 they tell you to take it off, or what did they tell
8 you?

9 A: They told me to keep it on during most of
10 the day, but at night time, when I slept, I could take
11 it off.

12 Q: Okay. Well, were you supposed to be
13 wearing it when you saw Dr. Young?

14 A: I probably was.

15 Q: Okay. Can you tell me why there's no
16 mention in Dr. Young's records of you wearing a
17 whiplash collar?

18 A: No. I can't tell you that.

19 Q: Could it be because you weren't wearing
20 it?

21 A: If the Doctor told me to wear it, I wore
22 it.

23 Q: Well, did he tell you to wear it or
24 didn't he?

25 A: He probably did. He put it on me, didn't

1 he?

2 Q: Well, why weren't you wearing it when you
3 saw Dr. Proffer and when you saw Dr. Young?

4 A: I probably was wearing it.

5 Q: But you can't explain to me why there's
6 no mention in either of those Doctor's records of you
7 following the hospital's instructions?

8 A: Well, I can't tell you why.

9 Q: Okay. I have no further questions.

10 MR. CAGAN: I just have one.

11 REDIRECT EXAMINATION

12 MR. CAGAN:

13 Q: Ms. Langrehr, do you recognize the driver
14 of the other automobile?

15 MRS. LANGREHR:

16 A: Yes, I do.

17 Q: Do you see him here today?

18 A: Um-hm.

19 Q: And who is that?

20 A: Mr. Hobbs.

21 Q: And he's seated next to his Counsel?

22 A: That's right.

23 Q: To the left of his Counsel.

24 COURT: Thank you, Ms. Langrehr. You can
25 step down.

1 MR. CAGAN: We need Mr. Langrehr, please.

2 COURT: If you'll approach the witness stand,
3 please, MRS. LANGREHR, and just take a seat, please,
4 sir.

5 Whereupon,

6 FRANKLIN D. LANGREHR

7 was called as a witness on behalf of the
8 Plaintiff, and having been sworn, was
9 examined and testified as follows:

10 DIRECT EXAMINATION

11 MR. CAGAN:

12 Q: Mr. Langrehr, would you please state your
13 full name for the record?

14 MR. LANGREHR:

15 A: Franklin Delano Langrehr (phonetic).

16 Q: Okay. And you're married to Mrs. Betty
17 Langrehr. Is that correct?

18 A: Yes, sir.

19 Q: Now, I call your attention to September.
20 16, 1986. I'd like to approach this magnetic board
21 over here -- we're going to identify the east - west
22 street as Reedbird Avenue and we're going to identify
23 the north - south street as Hanover Street. Do you
24 understand that, sir?

25 A: Yes.

1 Q: We're going to identify this yellow truck
2 as Mr. Hobbs' vehicle.

3 A: Right.

4 Q: The driver of the van.

5 A: Right.

6 Q: And we're going to identify this as your
7 vehicle.

8 A: Yes.

9 Q: Is that correct?

10 A: Yes, sir.

11 Q: Now, you were driving that vehicle on
12 that day, is that correct?

13 A: Yes, sir.

14 Q: Would you please move these vehicles and
15 show His Honor exactly what happened at that
16 intersection on that date?

17 A: Okay -- should I start at the beginning?

18 Q: Yeah.

19 A: We were heading up to South Baltimore
20 General Hospital to see a friend.

21 Alright. Right up from the other side of
22 South Hanover Street there's Reedbird or whatever the
23 name of this street was. And I come down, I had got to
24 the light.

25 Q: Take it all down as far as you went that

1 day.

2 A: There.

3 Q: Okay.

4 A: Right here.

5 I was at the light, and Mr. Hobbs, with his
6 van, come around to my point -- if he -- to me, I
7 don't think he knew what he was doing. Because when he
8 come around, he come around so far and he come around
9 and got into me like that.

10 Q: And that's where your two vehicles made
11 contact?

12 A: Yes, sir.

13 Q: Is that correct, sir?

14 A: Yes, sir.

15 Q: Alright. You can take the stand again.

16 At the time of the impact between your two
17 vehicles, was your vehicle moving at all?

18 A: No, sir.

19 Q: Okay. What were you doing?

20 A: I was standing there waiting for the
21 light to change from red to green.

22 Q: Did you have an opportunity to observe
23 the driver of the other vehicle as he was making his
24 turn?

25 A: No.

1 Q: Where was your attention focused at that
2 time?

3 A: Straight at the light. Waiting for the
4 light to change.

5 Q: And then, suddenly, the two vehicles --

6 A: Suddenly, he come -- he come around and
7 he collided into me.

8 Q: Now, did there come a time when your wife
9 -- well, that. I'll drop that.

10 Witness with you.

11 CROSS EXAMINATION

12 MR. GINSBURG:

13 Q: Now, looking at where you had placed the
14 vehicles, Mr. Langrehr --

15 MR. LANGREHR:

16 A: Yeah.

17 Q: You're showing me that the left front
18 corner of your car made contact right at the door area
19 of -- of Mr. Hobbs' vehicle. Is that -- is that where
20 you intended to show that the vehicles met?

21 A: Something like that, yeah.

22 Q: Okay. So, are you telling the Court that
23 it was the left front corner of your vehicle that made
24 contact with the door of Mr. Hobbs' van?

25 A: Something like that.

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COURT: You have to talk up.

MR. LANGREHR: Yeah.

MR. GINSBURG:

Q: And you're certain of that?

MR. LANGREHR:

A: Yeah.

Q: The reason I bring that up --

A: Yeah.

Q: Is because your wife placed the cars so that the left front corner of your car was touching the left front corner of Mr. Hobbs' van. But you say that's not correct. It was the door that was struck.

A: I think that's so.

Q: Okay. Now, you also indicate by the way you placed the vehicles that you were beyond -- or you had not come up to where the stoplight would be at the intersection. Is that -- is that correct?

A: Right.

Q: Okay. You were stopped --

COURT: You have to talk up.

MR. LANGREHR: Correct.

MR. GINSBURG:

Q: Okay. You had stopped somewhere before you would get to the stop line?

MR. LANGREHR:

1 A: Right.

2 Q: How -- how far before the stop line would
3 you say that you were?

4 A: Ah -- two foot.

5 Q: Pardon me?

6 A: Two foot.

7 Q: Two foot. Okay. And you're showing me
8 that there was a line down the center of the road in
9 which you were stopped that Mr. Hobbs' van would have
10 been way over on your side of the road. Is that -- is
11 that what you meant to do?

12 A: No. He just made -- he just made too
13 sharp a turn to come around.

14 Q: Okay.

15 A: If I get to the board, can I show it?

16 Q: No, well, that's okay. That's okay.

17 COURT: You don't want him to go to the
18 board?

19 MR. GINSBURG: No.

20 COURT: Okay.

21 MR. GINSBURG:

22 Q: I'll accept it the way it is.

23 Now, do you remember any activity going on --
24 strike that. Do you remember what building was to the
25 left of you when you were stopped at the traffic light?

1 Let me ask you this. Do you remember the
2 police headquarters that's located there?

3 MR. LANGREHR:

4 A: I know it's --

5 Q: The Southern District Headquarters?

6 A: I know it's there. I know it's the
7 headquarters there.

8 Q: Okay. Do you remember any activity going
9 on in that building, like construction, or they were
10 installing a statue, or something?

11 A: No, I do not.

12 Q: You don't remember that going on?

13 A: No, I don't remember that.

14 Q: Is it possible that at the time of the
15 accident, that you really weren't stopped, but that
16 your vehicle had drifted forward?

17 A: Nah. No way.

18 Q: Why -- why are you so certain of that?

19 A: Because I'm usually -- driving careful
20 when I come up and down because I know it's so many
21 accidents out there. I always watch what I'm doing. I
22 don't have no terminally bad record on my driver's
23 license or anything like that. I'm always careful.

24 Q: Okay. Because -- because you're careful.

25 Do you remember what complaint or -- strike

1 that.

2 Do you remember talking to the police
3 following the accident?

4 A: After -- after we collided, Mr. Hobbs
5 come out and he asked me --

6 Q: No. My question is --

7 A: Oh.

8 Q: Do you remember talking to the police?

9 A: Yes.

10 Q: Okay. And do you remember the police
11 asking if anybody was hurt, if anybody needs an
12 ambulance?

13 A: Yes.

14 Q: And do you remember that at the time that
15 -- that there wasn't reason for an ambulance? That
16 your wife didn't have any complaints at that time?

17 A: Yeah.

18 Q: Okay. And you didn't have any complaints

19 --

20 A: No.

21 Q: At that time?

22 A: No.

23 Q: And none of the people in Mr. Hobbs' van
24 had any complaints?

25 A: No.

1 Q: And do you remember that there were four
2 other -- or, three other people in the van with Mr.
3 Hobbs?

4 A: I knew he had other people in the van.

5 Q: Okay. You remember there being several
6 people in the van?

7 A: Ah, yes, I do.

8 Q: Okay. And none -- none of those people
9 complained that they were injured, did they?

10 A: No.

11 Q: Do you remember if the police prepared a
12 report or if they said, you know, since nobody's
13 injured we don't have to do a report?

14 A: No.

15 Q: Do you --

16 A: I don't.

17 Q: Okay. You don't remember there being a
18 police report or anything?

19 A: No.

20 Q: After the accident, did you -- were you
21 able to drive your vehicle?

22 A: Yes.

23 Q: Was there any damage to your car?

24 A: Damage to the front and the side.

25 Q: And the side? What about the front?

1 What was damaged?

2 A: The grille, and -- ah -- oh, man. A
3 couple of little odds and ends. I can't actually
4 remember.

5 Q: Well, let me ask you. It was -- how
6 about the headlights? Were the headlights or the
7 lights on the corner damaged at all?

8 A: I can't remember.

9 Q: Okay. How about -- how about the bumper?
10 Was that pushed in at all?

11 A: Yeah.

12 Q: Okay. Did any -- did any pieces come off
13 the bumper or around the lights?

14 A: I can't remember.

15 Q: Okay. And what about the side? You said
16 that the side was also damaged?

17 A: I had, like, ah -- scrapings on it and
18 stuff.

19 Q: Okay. And what side would that be?

20 A: Driver's side.

21 Q: I have no further questions. Thank you.

22 MR. CAGAN: You can wait outside, Mr.
23 Langrehr.

24 COURT: Thank you, Mr. Langrehr.

25 MR. CAGAN: Your Honor, that is the

1 Plaintiff's case.

2 COURT: Very well.

3 MR. GINSBURG: Your Honor, I would call Mr.
4 Hobbs as my witness.

5 COURT: Mr. Hobbs, would you take the stand,
6 please, sir?

7 MR. HOBBS: Yes, sir.

8 Whereupon,

9 EPHRAIM L. HOBBS

10 was called as a witness on behalf of the
11 Defendant, and having been sworn, was
12 examined and testified as follows:

13 DIRECT EXAMINATION

14 MR. GINSBURG:

15 Q: Mr. Hobbs, would you state your full name
16 and your address, please?

17 MR. HOBBS:

18 A: Ah, my name is Ephraim Lester Hobbs. I
19 live at 2400 Brookfield Avenue, Baltimore, Maryland.

20 Q: Okay. You have to speak up and face the
21 Judge. That microphone doesn't amplify your voice.

22 A: Oh, okay.

23 Q: It's just recording us.

24 Mr. Hobbs, at the time of the accident, where
25 were you coming from and where were you going to?

1 A: I was coming from work in Curtis Bay and
2 going into the city.

3 Q: Okay. And what were you driving at the
4 time of the accident?

5 A: I was driving a Ford van.

6 Q: Alright. And what color was that van?

7 A: Green.

8 Q: And was there anybody else in the van
9 with you?

10 A: Yeah, there was several other people with
11 me.

12 Q: Okay. Can -- can you name who any of
13 those people were in the van?

14 A: Ah, yeah. Vincent Dodson (phonetic),
15 Eddie Smith (phonetic), Thomas Warner (phonetic), and
16 Marcus Taylor (phonetic).

17 Q: Okay. Where was Mr. Dodson seated in the
18 van?

19 A: If I'm not mistaken, at the -- I think he
20 was in the passenger seat on the left. I'm not quite
21 sure of that, but I think it was on the left.

22 Q: Okay. Now, you heard Mr. and Mrs.
23 Langrehr testify where the accident occurred.

24 A: Right.

25 Q: Can -- and -- and -- can you tell the

1 Judge what the name of the intersection was where the
2 accident occurred?

3 A: Hanover and Cherry Hill Road.

4 Q: Okay. Well, you heard them say Reedbird.
5 Is that correct?

6 A: That's what they said, but it's not. I
7 come that way every day.

8 Q: Okay. On which street were you?

9 A: I was on Hanover Street.

10 Q: Okay. And Hanover Street is a one lane
11 street?

12 A: No --

13 Q: Where you --

14 A: It's a one way street.

15 Q: Okay. That's what I meant. Excuse me.

16 A: Going north.

17 Q: Alright. As you were coming to Cherry
18 Hill, which way were you planning on going?

19 A: I was making a -- to make a left on
20 Cherry Hill Road off of Hanover Street.

21 Q: Okay. Now, as you were approaching the
22 intersection of Cherry Hill Road while you were on
23 Hanover, did you notice whether there was a traffic
24 signal?

25 A: Yes. There's a traffic signal.

1 Q: Okay. And as you were approaching that
2 intersection, what color was that traffic signal?
3 For you?

4 A: Red. I had to stop.

5 Q: Okay. Now, when you stopped, in which
6 lane were you?

7 A: In the left. I was making a left turn.

8 Q: Okay. Were there any vehicles stopped in
9 front of you?

10 A: No.

11 Q: How long were you stopped there before
12 you proceeded?

13 A: Ah -- I'd say about ten seconds, maybe.
14 Something like that. The light changed. The light
15 changed when I -- after I stopped. You know. I set
16 there about ten seconds.

17 Q: Okay. Tell -- tell the Court what
18 happened when you began to proceed forward and then
19 make your left turn.

20 A: Okay. As I was going to make my left
21 turn, this car that these people were in were drifting.
22 And had stopped. So I continued to turn and it drifted
23 again. And I continued so -- when I got in to make my
24 turn, it drifted a little bit more and that's when I
25 stopped and hit the horn. And at that time, he put on

1 the brake and it kind of dipped into my door.

2 And it only made a -- a little dent. What
3 was happening -- they was, ah -- there was a man
4 working on a statue over there on the corner of the new
5 police station --

6 Q: Okay, well -- we'll get to that. Now,
7 when you first saw the Langrehr vehicle, was it moving
8 or stopped?

9 A: Moving.

10 Q: Okay. Now, in relation to the corner --
11 and if that board with the cars will help you, can you
12 show the Court where the Langrehr vehicle was when the
13 accident happened?

14 You can move those out of the way. I just
15 want you to show me where the other car was at the time
16 of the accident.

17 A: When the accident happened, I was here.
18 We were on this side of the -- we were -- this is the
19 street, right here.

20 Q: Okay.

21 A: I was here at the light. When the light
22 changed, I started up to make my turn, and the car was
23 drifting. Like they drifted down -- so I merely come a
24 little bit more because I thought they would see me.
25 They eventually came all the way down in the street.

1 So, when I made my turn, right there's my
2 door -- and he was drifting. I hit my horn, and he put
3 on the brakes, and they dipped into my door.

4 Actually, there was no accident.

5 Q: Okay. Now, did you see where the
6 attention of the driver was at the time that you were
7 blowing your horn?

8 A: Watching the man over there build the
9 statue?

10 Q: Where -- where was this statue that the
11 man was building?

12 A: Right on the corner of Hanover and Cherry
13 Hill Road. Right at that -- at the police station.
14 They were just completing it.

15 Q: Okay. I have no further questions.
16 Thank you.

17 CROSS EXAMINATION

18 MR. CAGAN:

19 Q: Mr. Hobbs, isn't it a fact that at the
20 time the contact between your vehicle and the other
21 vehicle occurred that in fact you were talking and
22 laughing with the other passengers in your vehicle?

23 MR. HOBBS:

24 A: No.

25 Q: You stated that you saw the vehicle

1 drift.

2 A: Right.

3 Q: And stop --

4 A: Right.

5 Q: As you were starting to make your turn?

6 A: Right.

7 Q: Is that correct?

8 A: Right.

9 Q: Then you saw it drift again?

10 A: Right.

11 Q: And then you say there was some contact
12 between the two of your vehicles?

13 MR. GINSBURG: That's not exactly what was
14 said.

15 MR. HOBBS: That's not exactly what I said.

16 MR. CAGAN:

17 Q: Okay. Well, you tell me what you said.

18 MR. HOBBS:

19 A: I said, after he'd drifted a little bit -
20 - looked like he was easing up off the brake, or the
21 brakes wasn't holding. So I figured he was stopped.
22 So it's a turn -- I'm at a standstill, so there's no
23 need to take off fast. I'm going to make a turn.

24 And as he drifted out a little more, I slowed
25 down. I was only doing about a mile an hour. So,

1 their attention was focused on the statue there on that
2 corner. Suddenly -- and I realized this -- so, when he
3 got real close, and I was in my turn, and I hit the
4 horn, because he was looking -- from where I was
5 setting, up in the van, it looked like he had already
6 hit me. But he hadn't.

7 So, when he touched his brakes again, the car
8 kind of dipped. And that's when we made contact.
9 Actually, I was standing still when the car -- when we
10 made contact.

11 Q: You were totally stopped?

12 A: Totally stopped.

13 Q: In other words, what you're saying is
14 that you stopped in the middle of an intersection in
15 the middle of a turn, and he just drifted into you. Is
16 that what you're saying?

17 A: He was all the way in the street.

18 MRS. LANGREHR: Oh, bull.

19 MR. CAGAN:

20 Q: How far out in the street was he?

21 COURT: Wait one second.

22 Ms. Langrehr, I realize it's kind of hard.
23 But you're going to have to --

24 MR. CAGAN: How far out in the --

25 COURT: Just a moment --

1 MR. CAGAN: How far in the --

2 COURT: Just a moment, Mr. Cates (phonetic).

3 MR. CAGAN: I'm sorry, Your Honor.

4 COURT: I realize it's nerve wracking, but
5 you're going to have to -- he sat there and listened to
6 you --

7 MRS. LANGREHR: Okay.

8 COURT: And you're going to have to sit there
9 and listen to him.

10 MRS. LANGREHR: Okay.

11 COURT: Okay? Go ahead.

12 MR. CAGAN: Sorry, Your Honor.

13 COURT: Um-hm.

14 MR. CAGAN:

15 Q: How far out in the street did this
16 collision take place? Why don't you place the --

17 MR. GINSBURG: Hey -- objection, Your Honor.
18 Ah -- objection. Mr. -- Mr. --

19 COURT: What's the basis for the objection?

20 MR. GINSBURG: The basis of the objection is,
21 all Counsel asked was how far. He didn't ask him
22 anything else. I -- I think he's trying to make him
23 represent on this board, but he didn't ask him to do
24 that.

25 COURT: No, I think he did. Go ahead.

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MR. GINSBURG: No --

COURT: The objection is overruled.

MR. GINSBURG: And I'm objecting because this is in no way to scale. Counsel already moved the pieces around. I -- I think it's terribly misleading, Your Honor.

COURT: Okay. Overruled.

Go ahead, Mr. Hobbs.

MR. HOBBS: Okay. This is --

COURT: Can you stand back a little bit, please?

MR. HOBBS: Okay. Sir, this is the -- this is the curb, right? This is the curb here, and the curb here.

Right along here you have a white line where cars normally stop. They stopped at that line in the beginning. Now, in the two seconds that it take me to come from to up here like this, they started drifting. Then they stopped. Then they started drifting. Then they was stopped.

My attention was on driving. I had seen the statue before.

I was getting ready to make my turn. They eventually got all the way down here. As a matter of fact, right about here is where we made the contact.

1 Right there. That's when I stopped. I couldn't make
2 the turn because I didn't have enough room to
3 straighten up and turn. I had to make a turn there
4 because that's how small that lane is to turn in to
5 Cherry Hill Road.

6 Then he hit me right there on the door.

7 MR. CAGAN:

8 Q: This board shows two lanes.

9 MR. HOBBS:

10 A: Right.

11 Q: Okay. Let's say, for the sake of
12 argument, this is Cherry Hill Road.

13 A: Right.

14 Q: And this is two lanes. Okay. Now, you
15 would have wanted to make your turn into this lane? Is
16 that correct?

17 A: Right. Right.

18 MR. GINSBURG: Objection. That's not what he
19 was showing.

20 COURT: Overruled.

21 MR. HOBBS: I'll just move it back over here
22 like this, then. That's the same thing. I just said,
23 we -- (unclear) it was two lanes. I explained that to
24 you in the beginning.

25 MR. GINSBURG: See, Your Honor, the witness

1 doesn't understand --

2 MR. CAGAN:

3 Q: Mr. Hobbs, you've got one lane that's
4 going west and one lane that's going east.

5 MR. HOBBS:

6 A: Okay.

7 Q: Now, this is the center of the dividing
8 line. Are you trying to tell us that the angle of your
9 vehicle was in the wrong -- was in the wrong lane? On
10 the opposite side of the dividing lane?

11 A: No. What I'm trying to tell you is that
12 I said this would be two lanes in here.

13 Q: Oh --

14 A: But you're making it one lane.

15 Q: Well, that's because the diagram shows
16 two lanes.

17 A: If you want to use a diagram, then --

18 Q: That's what I'm asking you to do --

19 MR. GINSBURG: See, that's why I'm objecting.
20 Because these cars are not to scale with the lanes,
21 Your Honor.

22 MR. CAGAN: That's --

23 MR. GINSBURG: That's the problem.

24 COURT: Okay. I understand that. Overruled.

25 MR. CAGAN:

1 Q: That's the way you're showing me it
2 happened?

3 MR. HOBBS:

4 A: Actually, it's -- this car was like that.
5 More or less to the right. He wasn't in the center
6 because he was going -- he wasn't going to make a left
7 turn, he was going straight ahead.

8 Q: Mr. Hobbs, was there anything preventing
9 you -- if you saw -- if you thought you saw him move --
10 was there anything preventing you from stopping, making
11 that turn, and going a little further up to make the
12 turn?

13 A: Yes.

14 Q: What?

15 A: Not enough room.

16 Q: Well, how much room would you say there
17 was to make the turn? How many feet?

18 A: I don't -- I -- I'm not into that.

19 Q: Well, let's put it this way. You're
20 sitting there in that chair. Point to some reference
21 in this court room that you would feel would be the
22 space that you had --

23 MR. GINSBURG: Objection --

24 MR. CAGAN:

25 Q: Between the chair and the space --

1 MR. GINSBURG: Objection, Your Honor --

2 MR. CAGAN: To make that turn.

3 MR. HOBBS: I --

4 COURT: Sustained.

5 MR. GINSBURG: You don't have to answer.

6 MR. CAGAN:

7 Q: Mr. Hobbs, do you recall answering the
8 questions that I sent to your attorney so that he could
9 prepare answers with you? Do you recall preparing
10 that?

11 MR. HOBBS:

12 A: Yeah. I think so.

13 Q: Okay. Now, do you recall that one of the
14 questions that you were asked was -- Question Number
15 Two, give a concise statement of the facts as to how
16 you contend that the occurrence took place, including
17 the time of the occurrence and the respective speeds,
18 directions, positions and location of all involved
19 during their approach to the occurrence and at the time
20 of the occurrence. Do you recall that?

21 And do you recall that your only answer to
22 that was, the vehicle in which the Plaintiff was a
23 passenger in appeared to have moved forward into the
24 intersection colliding with my vehicle?

25 A: Right.

1 Q: Okay. Now, at no time did you say at
2 that answer that you saw him drift. Is that correct?

3 A: Now, the -- yes. And where it got hit,
4 no.

5 MR. GINSBURG: I object, Your Honor. That's
6 the language of the attorney.

7 COURT: With that understanding, I'll
8 overrule the objection.

9 MR. CAGAN: Then I'm going to -- if that is
10 the case, Your Honor, I'm going to ask the Court to
11 understand a mistake that I made in the Pleadings in
12 identifying Reedbird Avenue.

13 COURT: I have no problem with that at all.

14 MR. CAGAN: Okay.

15 COURT: I have no problem with that at all.

16 MR. CAGAN: I can explain to the Court that
17 basically, if you check the Answers to Interrogatories,
18 you'll see that she identified --

19 COURT: I don't have any problem with that.

20 MR. CAGAN: That was my fault, Your Honor.
21 On Cherry Hill Road -- I just --

22 COURT: I don't --

23 MR. GINSBURG: Your Honor, if he's going to
24 explain --

25 MR. CAGAN: Your Honor, I don't mind stating

--

1
2 COURT: I don't have any -- as you folks saw
3 in the last case, everybody said Exeter Street --

4 MR. CAGAN: Right.

5 MR. GINSBURG: Yeah.

6 COURT: It happens all the time. Let's not
7 get bogged down in --

8 MR. CAGAN: Totally my fault. I put down the
9 wrong road --

10 MRS. LANGREHR: I told him it was Cherry Hill
11 Road.

12 COURT: Let's move on to the real issues of
13 the case. Let's get to the meat of the matter.

14 MR. CAGAN:

15 Q: I understand that, Your Honor.

16 Mr. Hobbs, that was your answer to my
17 question, is that correct? The one that you listed for
18 your -- that your attorney put down on this paper? Is
19 that correct?

20 MR. HOBBS:

21 A: What was the question?

22 Q: Okay. The question was, giving a concise
23 statement of the facts as to how this occurred -- okay.
24 And all you did was say that the vehicle in which the
25 Plaintiff was a passenger in appeared to -- what do you

1 mean by the word appeared?

2 MR. GINSBURG: Objection, Your Honor. Again,
3 it's the language of the attorney.

4 COURT: That's overruled.

5 MR. HOBBS: I mean, when I say appeared, I
6 mean, that's what he was doing. Drifting.

7 MR. CAGAN:

8 Q: Did you tell your attorney you actually
9 saw him drift into you?

10 MR. HOEBS:

11 A: That's what I told my attorney.

12 Q: When you signed these Interrogatories,
13 did you read them?

14 A: Briefly.

15 Q: Did you see that he had put down appeared
16 to move into the intersection?

17 A: I didn't take that into consideration.

18 Q: You didn't tell him to change that, did
19 you?

20 A: No.

21 Q: You just signed it?

22 A: Right.

23 Q: How many people, all told, did you have
24 in your van?

25 A: Counting myself?

1 Q: Counting yourself.

2 A: Five people.

3 Q: And what were the other people in the van
4 doing?

5 A: Reading, talking, smoking, whatever.

6 Q: You were talking with them?

7 A: No.

8 Q: You weren't talking to them at all?

9 A: No.

10 Q: Do you remember coming over to the
11 Langrehr vehicle after the accident and saying you were
12 sorry?

13 A: No.

14 Q: You never said that?

15 A: I went over there to see if anybody was
16 hurt or anything. I didn't say I was sorry. I might
17 have said I was sorry the accident happened. I wasn't
18 sorry.

19 Q: I have no further questions for this
20 witness.

21 REDIRECT EXAMINATION

22 MR. GINSBURG:

23 Q: Mr. Hobbs, before you testified did --
24 did I take you up to this blackboard and show you where
25 to move the cars, or anything like that?

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MR. HOBBS:

A: No. This is the first time I -- I never been at this blackboard.

Q: Who -- whose fault was the accident, Mr. Hobbs?

MR. CAGAN: Objection, Your Honor.

COURT: Sustained.

MR. GINSBURG:

Q: Mr. Hobbs, whose fault was the accident?

COURT: I just sustained.

MR. GINSBURG: I'm sorry. I thought it was overruled. I apologize.

COURT: That's alright.

MR. GINSBURG: It's getting late.

No further questions. Thank you.

COURT:

Q: Just so I get my bearings, Mr. Hobbs. Were you northbound or southbound on -- on Hanover Street?

MR. HOBBS:

A: Northbound.

Q: So you -- so the hospital was on your right?

A: Right.

Q: So they were going -- when you say they

1 were going across, you're saying that because you heard
2 Ms. Langrehr testify that they were going to the
3 hospital?

4 A: That's right.

5 Q: Okay. Alright. And so the Southern
6 District Station would have been to your --

7 A: Left.

8 Q: To your left as you were going up
9 Hanover, but to your right as you turned on to Cherry
10 Hill Road.

11 A: Right.

12 Q: Okay. I got it. You can have a seat.
13 Do you need the other gentleman?

14 MR. GINSBURG: Please. Briefly, Your Honor.

15 COURT: Okay. His name?

16 MR. GINSBURG: His name is Dodson.

17 COURT: Mr. Dobson (phonetic).

18 MR. GINSBURG: Vincent Dodson.

19 COURT: Dodson.

20 MR. GINSBURG: D - O - D.

21 COURT: D - O - D.

22 MR. GINSBURG: Dodson.

23 COURT: Mr. Dodson, would you approach the
24 witness stand, please, sir? You're already under oath.
25

Whereupon,

VINCENT DODSON

was called as a witness on behalf of the
Defendant, and having been sworn, was
examined and testified as follows:

DIRECT EXAMINATION

MR. GINSBURG:

Q: Mr. Dodson, would you tell the Judge your
full name and your address, please?

MR. DODSON:

A: My name is Vincent Dodson, and I live at
1210 Myrtle Avenue, Baltimore.

COURT: Keep your voice up, please.

MR. DODSON: Baltimore, Maryland.

COURT: I heard you.

MR. GINSBURG:

Q: Alright. Were you a passenger in a van
that was involved in automobile accident?

MR. DODSON:

A: Yes, I was.

Q: And who was that van -- or, who was
driving that van at the time of that accident?

A: Hobbs, which is my co-worker. He's
sitting over there.

Q: Okay. Where -- where in the van were you

1 sitting at the time of the accident?

2 A: Just behind him. But not directly behind
3 him, but behind him.

4 Q: Okay. Now, did you see the other vehicle
5 that was involved in the accident before the accident
6 occurred?

7 A: Yes, I did.

8 Q: Okay. And was that vehicle stopped or
9 moving when you first saw it?

10 A: When I first saw it, it was completely at
11 a stop at a red light.

12 Q: Okay.

13 A: At a complete stop.

14 Q: Alright. Now, do you remember which road
15 you were on when the accident occurred?

16 A: I was up -- I don't know what street it
17 was, offhand. But anyway, there's a car dealership
18 there. It was a Harbor City Motors, or whatever. With
19 a parking lot --

20 Q: Alright.

21 A: Right there.

22 Q: Do you remember the name -- that's down
23 the street from there --

24 A: Um-hm.

25 Q: Do you remember the name of the

1 intersection of -- of the other street where the
2 accident occurred?

3 A: Well, we was right there at the new
4 police station. They had just erected the new police
5 station.

6 Q: Okay. Was --

7 A: The South Baltimore Police Station.

8 Q: Okay. Was there any activity going on in
9 front of the police station while you were at the
10 intersection?

11 A: No more than normal.

12 Q: Okay. Do you remember any construction
13 or anything?

14 A: I think, ah -- a couple of guys were over
15 there -- ah -- constructing this statue up there of an
16 officer and a kid.

17 Q: Okay.

18 A: That was like in progress.

19 Q: Now, as Mr. Hobbs approached this
20 intersection, do you remember what color the traffic
21 light was for him? As he was coming up to the
22 intersection?

23 A: No, sir. No, I didn't see that.

24 Q: Okay. You were --

25 A: Because I was setting behind. I couldn't

1 -- I couldn't -- you know, see that.

2 Q: Okay. Do you know what color the traffic
3 light was when you proceeded forward?

4 A: It was green.

5 Q: Okay. Now, as Mr. Hobbs was moving
6 forward, ah, did you notice what the other vehicle was
7 doing?

8 A: Yes. He sitting there.

9 Q: Okay. Did you see the other vehicle move
10 at all at any time before the accident occurred?

11 MR. CAGAN: Objection, Your Honor. He's
12 leading.

13 MR. DODSON: What I -- I was -- the only
14 thing I can tell you is the same thing I would tell --

15 COURT: I'm going to overrule. I don't think
16 it's -- I don't think it's leading at all.

17 MR. DODSON: What I seen is this --

18 MR. GINSBURG:

19 Q: Okay --

20 MR. DODSON:

21 A: The car that this lady or whoever was in
22 was setting there and there was three people in the
23 car. It was setting there at a complete stop.

24 Mr. Hobbs was making -- was -- came up to the
25 light --

1 Q: Okay --

2 A: It was green. He was making a turn.

3 Q: Then what happened?

4 A: He slowed completely down to make his
5 turn safely. They just drifted into him. It wasn't no
6 run-in and bang him and hit him on the passenger -- on
7 the driver's side. From where I was sitting at.

8 Q: Okay. Were you --

9 A: And it come to a rest. It wasn't a bang
10 or a hit or a run-in. Nobody was injured or rocked or
11 anything. It just come to a drift, and stopped.

12 Q: Okay.

13 A: The car.

14 Q: No further questions. Thank you.

15 A: Because if anything else had happened, he
16 would have drug the car around the corner. You know.

17 CROSS EXAMINATION

18 MR. CAGAN:

19 Q: Mr. Dodson, did you have an opportunity
20 to discuss with Mr. Hobbs how the accident occurred?

21 MR. DODSON:

22 A: No. Me and Mr. Hobbs talked and never
23 knowed anything about -- I thought it was over with
24 three years ago. I been away from the job going into
25 four years. I been out with heart surgery.

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Q: Okay. Did you talk to him today?

A: No, I did not.

Q: Did you talk to his attorney?

A: I talked to his attorney today.

Q: Okay.

A: But it wasn't --

Q: Prior to today, did you talk to his attorney?

A: No. The only thing I did was gave my address and phone number to Mr. Hobbs so he could get in touch with me to get this Court Order or whatever to come in. Other than that, that's it.

Q: Now, you say that at all times, up to entering the intersection, Mrs. Langrehr's car -- the other car -- was standing dead still at that intersection?

A: Yes. That's what he was doing. Standing dead still.

Q: You were sitting in back of Mr. Hobbs in the van?

A: Right.

Q: Is that correct?

A: Right.

Q: Okay. Were you in the middle of that passenger seat, or were you on the direct left side of

1 that passenger seat?

2 A: I wasn't directly behind him, but I was
3 sitting like this far -- you know --

4 Q: About a foot from the window?

5 A: About a foot. Six inches. Seven inches.
6 Whatever. I wasn't leaning against it or laying
7 against it. I was a reasonable distance --

8 Q: Who was sitting next to you?

9 A: I couldn't tell you. The only thing I
10 could tell you was what was happening on the side that
11 I was looking out of.

12 Q: Well, let me ask you this. Was there
13 anybody sitting next to you?

14 A: I think there was another fellow sitting
15 there.

16 Q: How many people were in the van all
17 together?

18 A: I don't even really know. The only thing
19 I know is the drifting, the stop, and -- it wasn't
20 really a bang or a hit or anything.

21 Q: I didn't ask you that. I asked you if
22 you knew how many people were in the van.

23 A: No, I don't.

24 Q: Would you be surprised if the testimony
25 revealed that there were five people in the van?

1 A: If it was six or seven -- you know, it's
2 been like, three years ago.

3 Q: Were you one of the people that was
4 smoking in the van?

5 A: Well, I don't smoke, period.

6 Q: Were there other people smoking in the
7 van?

8 A: Whether they were or not, I don't know.

9 Q: Were you talking to anybody at the time?

10 A: We might have been carrying on our
11 general conversations. Who knows? You know, I don't
12 know. You talking about three years down the road.

13 Q: When you made the turn --

14 A: I didn't make a turn. I was sitting
15 there. I was a passenger.

16 Q: Okay. When the van made the turn. Turn
17 around just one minute, if you please. Okay.

18 When the van made the turn, would it -- and
19 we'll identify the yellow vehicle as the van. Would it
20 be fair to say that the police department would have
21 been up here?

22 A: No. It should have been right here.

23 Q: On the corner?

24 A: Right. On the corner.

25 Q: Okay. Starting at the corner, but taking

1 the length of that entire block. Is that correct?

2 A: Yes. The police station should have been
3 here on --

4 Q: Okay. You say --

5 A: The used car dealership would have been -
6 -

7 Q: Okay. You say that there was a statue
8 being erected?

9 A: Yeah. Right up here --

10 Q: Where would that have been?

11 A: Along here in this green area.

12 Q: And your attention was directed to what
13 was going on with that statue, is that correct?

14 A: Well, I'd seen that thing.

15 Q: Okay. At that time, you were looking at
16 the statue? Is that correct?

17 A: Not --

18 MR. GINSBURG: Objection.

19 MR. DODSON: We make that turn every evening
20 --

21 COURT: Overruled.

22 MR. DODSON: Coming home from work, like for
23 sixteen years, to my knowledge, I would ride with him.

24 MR. CAGAN:

25 Q: So, are you saying then, that your

1 testimony that you're giving here about what happened
2 that day -- you don't know whether they were working on
3 the statue that day or not?

4 MR. DODSON:

5 A: No, I do not. But I know this vehicle
6 was sitting here, and it was coming up like this. His
7 car was parked, and it rolled up like this. And he
8 slowed down to make this turn to go in here -- they
9 drifted on through and hit like that. Drifted through
10 and hit the side -- the side of his van.

11 Q: What side of the van, sir?

12 A: On the driver's side. Which (unclear) --

13 Q: How far down --

14 A: The driver --

15 Q: Was it towards the middle?

16 A: About where I was -- where I would be
17 sitting at, behind the driver.

18 Q: Where you were sitting at?

19 A: Right.

20 Q: Okay. In other words, you were towards
21 the middle of the van. Is that correct?

22 A: That's right. In other words, past the
23 driver -- and I'm behind the driver.

24 Q: Okay. In other words, what you're saying
25 then, is there was no contact between the --

1 A: And it was --

2 Q: The --

3 A: This was not even before the turn. In
4 other words, it was -- he slowed up and drifted right
5 on into the side. Just like that.

6 Q: In other words, you're saying there was
7 no contact, then, between the left front of the van.
8 The very left front quarter of the van --

9 A: It was back in this section. Back where
10 I was sitting.

11 Q: You're sure of that?

12 A: Yes, I am.

13 Q: When did you first observe Mr. Langrehr's
14 vehicle drifting? When did you first see that?

15 A: I was -- that -- I imagine Mr. Hobbs seen
16 that at the time. That's why he stopped.

17 Q: I didn't ask you that. When did you see
18 it?

19 A: Well, I'm sitting there, and I seen it --
20 you know, that it's drifting on down, you know. They
21 just sitting there looking -- and drifting on down. I
22 ain't have time to say anything or anything in this.

23 Q: Mr. Hobbs was moving at the time?

24 A: He had just about come to a complete stop
25 to make the turn, really.

1 Q: Well, you say -- why would he have to
2 have come to complete stop to make the turn? Was there
3 traffic in front of him?

4 A: Well, there's always traffic right there.

5 Q: I didn't ask you that. Was there traffic
6 in front of him that kept him from making --

7 A: No --

8 Q: He turned --

9 A: He didn't make no turn. I tell you they
10 drifted down into him while he was slowing up. Then he
11 stopped. He stopped. Okay?

12 Q: Was there any reason why he had to make
13 the stop rather than make the complete turn?

14 A: Well, I don't know. But I do know that
15 he stopped. That's why he didn't drag the front of
16 that car or any more damage was done. Because he
17 stopped and the car drifted into the side of him.

18 Q: Is it possible that he stopped because he
19 realized that he was making the turn too tight and that
20 he was making contact with Mr. Langrehr's vehicle? Is
21 that possible, sir?

22 A: I doubt it.

23 Q: I said, is it possible?

24 MR. GINSBURG: Objection. He answered, Your
25 Honor.

1 MR. DODSON: I doubt it -- I mean --

2 COURT: I think that's the answer --

3 MR. DODSON: Pulled all the way out in the
4 intersection and the drifting --

5 COURT: Just answer the questions, please,
6 Mr. Dodson.

7 MR. CAGAN:

8 Q: Was the window that you were looking
9 through clear?

10 MR. DODSON:

11 A: Just as clear as these glasses I'm
12 looking through.

13 Q: It wasn't tinted at all?

14 A: No. No tint or anything.

15 Q: Was there any post -- door post?

16 A: No.

17 Q: Between the front seat, where Mr. Hobbs
18 was sitting, driving his van, and the seat where you
19 were sitting?

20 A: Well, yes, there's a post there.

21 Q: There's a post right there. Is that
22 correct?

23 A: But it's -- but it's directly behind him.
24 In other words, it's like knee-length back to me.

25 Q: In other words, then --

1 A: His door post is sitting like this. And
2 I'm sitting like this. I got clear vision.

3 Q: Mr. Dodson, look at this for just a
4 minute, okay? You see Mrs. Langrehr sitting here.
5 Let's say, for the sake of argument, she is Mr. Hobbs
6 sitting in the driver seat.

7 A: Um-hm.

8 Q: Okay. And I am sitting behind her like
9 this. This distance, as you showed it with your hands,
10 from the side window. Is that correct?

11 Okay. Now. Where in relationship between
12 the two of us -- where would that door post be?

13 A: The door post would be about six or seven
14 inches behind her shoulders.

15 Q: Okay. Approximately -- approximately
16 right here?

17 A: That's why the door opens and close on
18 that side. That's where the post is.

19 Q: So in other words, to see what was
20 happening to the front of the van, the side and front
21 of the van -- actually, you would have to be looking at
22 an angle towards the door. Or, you would have to look
23 directly out the side --

24 A: That's where I was looking. Directly out
25 the side.

1 Q: Is that correct?

2 A: Directly out the side. Not on the angle.

3 Q: But, in fact, the car -- the Langrehr car
4 was in front. Isn't that correct?

5 MR. GINSBURG: Objection. At one point in
6 time --

7 MR. DODSON: Right. At one point in time, it
8 was --

9 COURT: Overruled.

10 MR. DODSON: It just drifted past.

11 COURT: Overruled. Just answer as best you
12 can, Mr. Dodson.

13 MR. DODSON: Yeah.

14 COURT: Please just answer the question.

15 MR. DODSON: Alright.

16 MR. CAGAN: Your Honor, I have no further --
17 no further questions for Mr. Dodson.

18 COURT: Any redirect?

19 MR. GINSBURG: No, sir, Your Honor. I'd like
20 to call Ms. Langrehr for one question.

21 COURT: Okay.

22 What time was the accident?

23 MR. DODSON: I have no idea.

24 COURT:

25 Q: Okay. You don't remember at all?

1 MR. DODSON:

2 A: I know it was after work, and after we
3 had taken a hot shower and whatnot, we were coming home
4 from work.

5 Q: So what time was the accident?

6 A: We left -- we got off at four-thirty, so
7 it had to be around five-thirty, quarter to six,
8 something like that.

9 Q: Okay. Thank you, Mr. Dodson.

10 Go back in the hall please, and do not
11 discuss your testimony.

12 Ms. Langrehr, would you retake the stand,
13 please?

14 MR. CAGAN: Just answer the questions
15 directed to you.

16 MRS. LANGREHR: Okay.

17 Whereupon,

18 BETTY LANGREHR

19 was called as a witness on behalf of the
20 Defendant, and having been sworn, was
21 examined and testified as follows:

22 DIRECT EXAMINATION

23 MR. GINSBURG:

24 Q: Ms. Langrehr --

25 COURT: Wait just one moment.

MR. GINSBURG: Okay.

1
2 (Pause)

3 COURT: Alright.

4 MR. GINSBURG:

5 Q: Okay.

6 Ms. Langrehr, after the first trial that was
7 here today in front of Judge Davis finished but before
8 we started, isn't it true that you and your husband and
9 Mr. Cagan were all standing around this board going
10 over the position of the cars and everything?

11 MRS. LANGREHR:

12 A: Yeah, it was, because I was trying to
13 point out how to him how it happened and he said, I
14 already --

15 Q: Okay. The three of you were standing
16 around and discussing the accident?

17 A: No. Me and Mr. Cagan was. Then -- then
18 I --

19 Q: Wasn't your husband in there also?

20 A: I think he might have been. I don't
21 know.

22 Q: And so the three of you were standing
23 around the board, positioning the vehicles, discussing
24 the case with Mr. Cagan. Is that correct?

25 A: I was showing Mr. Cagan how --

1 Q: Yes or no, please.

2 MR. CAGAN: Your Honor, doesn't she have
3 enough -- to answer --

4 MR. GINSBURG: It's a real simple question.

5 COURT: You can say yes or no, Mrs. Langrehr.
6 And then if you need to explain, you can explain.

7 MRS. LANGREHR: Okay. Yeah. I showed him
8 how it happened.

9 MR. GINSBURG: I have no further questions,
10 Your Honor.

11 CROSS EXAMINATION

12 MR. CAGAN:

13 Q: Ms. Langrehr, now that you've been
14 recalled, let me ask you this. At the time that the
15 impact occurred, did you have an opportunity to observe
16 what Mr. Hobbs was doing at that time?

17 MRS. LANGREHR:

18 A: Mr. Hobbs' head was turned, and they was
19 all laughing. It was like a bunch of men in a truck,
20 and they was all cutting up and carrying on and they
21 was laughing. Because I was looking dead straight and
22 seen the man and his head wasn't even looking where he
23 was turning, he was laughing with the other fellow in
24 the front.

25 Q: Okay. You could see that through the

1 window?

2 A: Yeah. I could see them laughing.

3 Q: Okay.

4 Witness with you.

5 REDIRECT EXAMINATION

6 MR. GINSBURG:

7 Q: Were they laughing at you, Ms. Langrehr?

8 MRS. LANGREHR:

9 A: No.

10 Q: Were they laughing because your car --

11 A: It looked like they was cutting up --

12 Q: Was about to drift into them?

13 A: No. They was -- his head wasn't even
14 looking at my car. His head was looking towards the
15 passenger, and they was laughing.

16 Q: Just -- just answer my question.

17 A: When he hit, then he looked. When he hit
18 my car, that's when he looked and put on his brakes.

19 Q: Did they drag your car forward at all?

20 A: No. They didn't drag our car forward at
21 all.

22 Q: Okay. Did he -- did the van stop
23 immediately upon impact --

24 A: Yes.

25 Q: Between your vehicle and the other

1 vehicle?

2 A: As soon as he hit me, he stopped. My car
3 was moved just a little bit to the side.

4 Q: I have no further questions. Thank you.

5 COURT: Thank you, Ms. Langrehr. You can
6 have a seat.

7 MR. GINSBURG: Your Honor, that would
8 conclude --

9 COURT: Alright.

10 MR. GINSBURG: Defendant's case. Thank you.

11 MR. CAGAN: Ah --

12 COURT: Mr. Cagan?

13 MR. CAGAN: Yes. If Your Honor pleases, I
14 would just state briefly.

15 Number one, we are not contending that this
16 was a major impact that moved the cars around or any
17 such thing.

18 COURT: Well, can you show me the damage on
19 these photographs?

20 MR. CAGAN: Your Honor, the damage -- not on
21 the photographs. The damage was on the estimate that
22 was done.

23 In other words, there was slight damage --

24 MRS. LANGREHR: It hit the grille.

25 MR. CAGAN: Slight damage that was done to

1 the grille, Your Honor.

2 MRS. LANGREHR: The grille was hit.

3 MR. CAGAN: What we're stating is that there
4 was impact between the two cars. What we're stating is
5 it was two hundred and some dollars worth of impact
6 between -- this car.

7 Of course, what hasn't been introduced into
8 evidence is the pictures of the van that show the
9 damage to the van.

10 MR. GINSBURG: Objection.

11 MR. CAGAN: The van --

12 MR. GINSBURG: Objection, Your Honor.

13 There's --

14 MR. CAGAN: It's not --

15 MR. GINSBURG: I'll be glad to show the
16 pictures.

17 MRS. LANGREHR: Can I see the pictures?

18 MR. CAGAN: Shhh! Wait a minute. Just a
19 second.

20 (Long Pause)

21 MR. GINSBURG: Now --

22 COURT: The objection is overruled.

23 MR. GINSBURG: Thank you, Your Honor.

24 COURT: Wait -- I just -- I just don't see
25 any damage here.

1 MRS. LANGREHR: That's because the grille --

2 COURT: Please --

3 MR. GINSBURG: Your Honor --

4 MR. CAGAN: Your Honor, there was contact
5 between the two vehicles.

6 Now, let me point out something on the
7 pictures.

8 COURT: Go ahead. Go ahead.

9 MR. CAGAN: And that is, you're dealing with
10 an old car that has a point -- a pointed chrome bumper.
11 Okay, these are not the old -- these are not the newer
12 bumpers that are the collapsible type of bumper.

13 So what we're basically stating is that when
14 contact was made here, it was made with this heavy
15 bumper. And causing a stress crack in the grille.
16 That does not mean that there can't be damage to the
17 occupant of the car. It's as simple as that.

18 The question that we have here is not whether
19 or not there's any damage to the car. I have handled
20 over twenty years numerous accidents where there is
21 extremely minor damage or hardly any damage where there
22 is contact between bumpers, particularly in the newer
23 type of bumpers, where there is some give to the
24 bumpers, and people are injured.

25 It all depends on how you --

1 COURT: But it says -- the -- but your
2 exhibit says the patient describes the impact as
3 severe. Now, surely, that can't be severe.

4 MR. CAGAN: Your Honor, you can take that
5 into consideration in the damages --

6 COURT: Well, I --

7 MR. CAGAN: The accident --

8 COURT: But in order to sustain the claim,
9 you've got to have damages.

10 MR. CAGAN: All you have to do is show that
11 there was an impact. There was admittedly an impact.

12 COURT: I don't think you --

13 MR. CAGAN: And she was describing what
14 happened to her body --

15 COURT: I don't think you have a negligence
16 claim simply on impact. I think you've got to show
17 damage.

18 MR. CAGAN: Your Honor, by their own
19 estimates, they --

20 COURT: It says she was dazed. I mean, this
21 is her doctor.

22 MR. CAGAN: Your Honor -- okay. Then I have
23 to tell you this. Because obviously Your Honor is
24 going off into the direction --

25 COURT: No, I'm not going off in any

1 direction. I'm --

2 MR. CAGAN: When you --

3 COURT: I'm trying to decide the case.

4 MR. CAGAN: Okay.

5 COURT: I'm presented with evidence --

6 MR. CAGAN: Your Honor --

7 COURT: The evidence -- the evidence is that
8 this was a kiss.

9 MR. CAGAN: Okay. Let me tell you something.
10 Six years ago, I'm sitting --

11 COURT: Mr. Cagan, I can't --

12 MR. CAGAN: At the -- please --

13 COURT: I can't --

14 MR. CAGAN: Let me say this --

15 COURT: No. I can't retry the case.

16 MR. CAGAN: No, no, I'm not saying that --

17 COURT: I can't try a case where you were
18 sitting at a light --

19 MR. CAGAN: No --

20 COURT: And somebody hit you, and you had a
21 pain in your neck for two weeks.

22 MR. CAGAN: No, no, no --

23 COURT: I can't try the case, sir.

24 MR. CAGAN: No, but you're saying --

25 COURT: Don't take me back six years --

1 MR. CAGAN: You're saying that there has to
2 be damage to be injury.

3 COURT: No, I'm not saying there has to be.
4 I'm not saying it has to be.

5 MR. CAGAN: Well, that's exactly what you're
6 saying --

7 COURT: I am saying -- I am saying, tell me
8 about the evidence in this case and there could be a
9 claim for damages -- personal injury damages described
10 as a severe impact where Ms. Langrehr is dazed when the
11 evidence in the case --

12 MR. CAGAN: Yeah --

13 COURT: The testimonial evidence and the
14 documentary evidence is that this was what I call a
15 kiss. The testimony of -- from the Defendant's
16 witnesses is that these vehicles made contact but the
17 contact was very slight.

18 Your witnesses don't describe in terms of
19 intensity the contact at all. The closest we come to
20 that is when Ms. Langrehr was there --

21 MR. CAGAN: Yeah --

22 COURT: She showed the van coming around the
23 corner and making contact. She doesn't say how fast
24 the van was going. She doesn't say what the impact was
25 like.

1 She just says that she was shaken.

2 MR. CAGAN: Well --

3 COURT: He body didn't touch anything in the
4 car.

5 MR. CAGAN: She said she was thrown forward.

6 COURT: She was thrown forward.

7 MR. CAGAN: And thrown backward.

8 MRS. LANGREHR: The car shook.

9 COURT: Please, tell your client to --

10 MR. CAGAN: Please, you've got to keep quiet.
11 She said she was thrown forward and then
12 thrown backward by this. That's what she is saying.

13 Now, if you're saying that you -- if Your
14 Honor is saying that you don't believe that she could
15 have been thrown forward and thrown backward, and
16 because you don't believe that, you're not believing
17 any of the other things regarding need for medical
18 treatment or necessity for any of that, that's one
19 thing.

20 And if that's what your ruling is going to
21 be, I'm going to have to accept that, and my client is
22 going to have to accept that.

23 But if you're saying that you're not going to
24 take into account any of this --

25 COURT: Okay. I see.

1 MR. CAGAN: Because you feel that there was
2 no damage to her vehicle --

3 COURT: No. Okay. I understand. No, that's
4 not what I'm saying. That's not what I'm saying.

5 MR. CAGAN: Well, that's what I figured you
6 were --

7 COURT: No. That's not what I'm saying. I'm
8 saying, how do I credit her testimony in the absence of
9 any visible damage?

10 MR. CAGAN: That's exactly --

11 COURT: It's not the -- it's not the -- it's
12 not the same thing.

13 I do not -- I am not saying, and have never
14 said, and will never say, that the mere absence of any
15 physical damage to the vehicles means that people can't
16 be hurt in a car accident. That's silly.

17 But what I have here, I suggest, is the total
18 absence of any visible damage. Now, apparently, there
19 is something in that grille -- I -- I just can't make
20 it out.

21 MRS. LANGREHR: The grille was broke.

22 MR. CAGAN: Wait --

23 COURT: So, when I weigh the quantum of
24 personal injury damages against the two hundred and
25 eighty six dollars and thirty cents which is not

1 otherwise elaborated, ah -- how can --

2 MR. CAGAN: I'll tell you --

3 COURT: How can --

4 MR. CAGAN: I'll tell you --

5 COURT: You can't just say --

6 MR. CAGAN: Okay --

7 COURT: And come to me --

8 MR. CAGAN: I'll tell you how --

9 COURT: Go ahead. Go ahead.

10 MR. CAGAN: Would you please look at the last
11 page of our stipulated evidence?

12 COURT: Okay.

13 MR. CAGAN: And that is the --

14 COURT: That's the estimate.

15 MR. CAGAN: That is the estimate of property
16 damage arising from this accident that was done by --
17 on behalf of the Defendant in this case.

18 COURT: Okay. Align the bumper.

19 (Long Pause)

20 MR. CAGAN: There's apparently the upper
21 grille and part of a panel. And there's also some arms
22 (phonetic) -- and I think that says replacement.

23 COURT: Replace --

24 (Long Pause)

25 MR. CAGAN: So there was damage that his own

1 company recognized done to this car. Suffice it to
2 say, not a lot. Very minor. But, nevertheless,
3 physical damage.

4 Not all damage has to be visible on the
5 outside of a picture.

6 (Long Pause)

7 COURT: Okay. I --

8 MR. CAGAN: I mean, we have agreed that there
9 is some damage to this vehicle as a result of the
10 collision between the two vehicles. We're not claiming
11 it's major damage --

12 COURT: There's no question of that.

13 MR. CAGAN: We're not claiming --

14 COURT: There's no question of that.

15 MR. CAGAN: Then the point becomes whether or
16 not you feel the impact caused this woman to undergo
17 what she has --

18 COURT: Well, I --

19 MR. CAGAN: Testified under oath --

20 COURT: That's what we have been talking
21 about.

22 MR. CAGAN: She had to go through --

23 COURT: That's what we have been talking
24 about.

25 MR. CAGAN: And then it comes down to a

1 question of credibility. And what I'm trying to say to
2 you is, she's saying that she was thrown forward and
3 backward in this. And that she suffered these
4 injuries.

5 COURT: Okay. Let me hear from Mr. Ginsburg.

6 MR. CAGAN: Can I talk about liability, or
7 don't we want to talk about that?

8 COURT: Well, that's what we have been
9 talking about.

10 MR. CAGAN: Okay -- no --

11 COURT: Well --

12 MR. CAGAN: I don't know. We really haven't
13 --

14 COURT: Okay. I'm sorry.

15 MR. CAGAN: That --

16 COURT: You want to tell me why I should
17 believe --

18 MR. CAGAN: Right.

19 COURT: That they were not drifting.

20 MR. CAGAN: Exactly.

21 COURT: Go ahead.

22 MR. CAGAN: Exactly. They're -- well, now
23 I'm really thrown on this one.

24 COURT: Why should I -- why should I believe
25 that they were not drifting?

1 MR. CAGAN: This is the reason why you should
2 believe it -- number one, it's totally -- Your Honor
3 sees every day, I'm sure, where it's a matter of common
4 sense -- where people make too tight a turn at an
5 intersection.

6 COURT: Sure.

7 MR. CAGAN: Now, we believe that's exactly
8 what happened to these people in this case.

9 You have Mr. Dodson, who was seated in the
10 seat --

11 COURT: Say -- I don't think that --

12 MR. CAGAN: In the back --

13 COURT: Say -- well. Let me hear from Mr.
14 Ginsburg.

15 MR. CAGAN: Okay.

16 COURT: Why should I believe that they were
17 drifting?

18 MR. GINSBURG: Ah --

19 COURT: I mean, you agreed that if they were
20 not drifting, then your client is guilty of negligence.
21 Correct?

22 MR. GINSBURG: Ah, based on those facts, yes.

23 COURT: Yeah. Okay.

24 So why should I believe that they were
25 drifting?

1 MR. GINSBURG: You have a couple of reasons,
2 Your Honor. You have the testimony of two witnesses,
3 Mr. Hobbs and Mr. Dodson, who tell you that's exactly
4 what happened.

5 COURT: Okay. Apart -- obviously, I have
6 that.

7 MR. GINSBURG: Okay.

8 COURT: Apart from that, why should I accept
9 that testimony?

10 MR. GINSBURG: Well, I was ready to start on
11 the repair estimate, actually.

12 COURT: What about the estimate?

13 MR. GINSBURG: Just that -- Your Honor --

14 COURT: Is --

15 MR. GINSBURG: It's a 1978 vehicle. It was a
16 1986 accident. The car was eight years old at the
17 time. This was an estimate of the damage that the
18 appraiser found on the vehicle, but it doesn't say --
19 and I'm not conceding that it --

20 COURT: I see. You're saying --

21 MR. GINSBURG: That it's related to this
22 accident.

23 COURT: I see. You're saying --

24 MR. GINSBURG: In fact, I would be -- I would
25 be amazed if someone didn't go out and examine any

1 eight year old car today and not find any damage.

2 The testimony -- and -- and I really tried to
3 get -- to get Mr. Langrehr or Mrs. Langrehr to say the
4 headlights were bashed and things like that, and --

5 COURT: Well, no, they wouldn't say that.

6 MR. GINSBURG: They didn't say that.

7 COURT: They wouldn't say that. They knew it
8 wasn't --

9 MR. GINSBURG: Well --

10 COURT: True.

11 MR. GINSBURG: I was hoping they would
12 exaggerate things. But they didn't. But --

13 COURT: Well, no, I don't think --

14 MR. GINSBURG: But in any event, Your Honor,
15 they -- frankly, they said that they were -- that there
16 just wasn't any damage.

17 Now, you used the -- or, Mr. Cagan was
18 talking about this being an old car. I remember in
19 1978 these were new cars, and these were modern bumpers
20 for 1978. And the defense we hear now with these --
21 these rubber bumpers with the shock absorbers and the
22 recoils are that you have accidents, and there's no
23 evidence of there being any impact.

24 Well, this isn't one of those bumpers, Your
25 Honor. You pointed it out yourself. It's one of these

1 older chrome, you know, pointy, whatever. And how
2 would -- how would there be anything wrong with the car
3 beyond the bumper if there's no visible damage to the
4 bumper, Your Honor?

5 And I -- and I agree completely with your
6 point that -- how could there be any physical injury,
7 then, if there's no physical evidence of there being an
8 impact? Because there just wasn't an impact.

9 Your Honor, if -- if the witness was injured,
10 perhaps -- and to -- to get back to your original
11 question. How do we know they were drifting?

12 We know they were drifting because Mr. -- Mr.
13 Langrehr had to -- had to apply his brakes. He
14 probably had to slam on his brakes.

15 COURT: Well -- but -- in other words, what
16 you're saying is --

17 MR. GINSBURG: And -- and --

18 COURT: He tells it one way, and she tells it
19 another way. I mean, neither one of you can point to
20 anything scientific, mystical, or any other thing that
21 is particularly dissuasive.

22 I don't have any reason to disbelieve Mrs.
23 Langrehr and her husband. I don't have any reason to
24 disbelieve Mr. Hobbs and his witness.

25 MR. CAGAN: I do.

1 COURT: You do?

2 MR. GINSBURG: Well --

3 MR. CAGAN: I do.

4 COURT: Well, what is it?

5 MR. CAGAN: They give is this business about
6 the statute (phonetic) over at the -- over at the
7 police station --

8 MR. GINSBURG: The statue.

9 MR. CAGAN: The statue. Excuse me. Over at
10 the police station --

11 MR. GINSBURG: I always do that.

12 MR. CAGAN: Yeah, in fact if that's the case,
13 the only way that Mr. and Mrs. Langrehr would be
14 concentrating on that statue is if they were sitting in
15 their car looking right over their shoulders at that
16 statue.

17 COURT: First of -- wait a minute. What --
18 what Mrs. Langrehr was doing was irrelevant. She was a
19 passenger.

20 MR. CAGAN: Okay. Mr. Langrehr.

21 COURT: And whether Mr. Langrehr was
22 daydreaming, nodding off, or --

23 MR. CAGAN: What --

24 COURT: Or paying attention to the statue --

25 MR. GINSBURG: It makes no difference.

1 MR. CAGAN: Well, what --

2 COURT: It doesn't matter. The point is, if
3 his foot came off the brake --

4 MR. CAGAN: The person who would be most
5 inclined -- whose attention would be most inclined to
6 be absorbed with what was going on at the police
7 station would be Mr. Hobbs, who was coming up the road
8 and is turning that way and looking directly at it.

9 COURT: I just don't think it has the kind of
10 force that you want to give it.

11 MR. CAGAN: Well --

12 COURT: It's a classic -- he says it happens
13 one way, she says it happens a different way. Is the
14 way I see it. I -- I don't see any special reason to
15 disbelieve Ms. Langrehr or to disbelieve Mr. Hobbs.

16 MR. CAGAN: Well, Your Honor, I think if you
17 take Mr. Dodson, who is supposed to be backing him up.
18 He's the one that says that the car drifted into the
19 center of the van. Okay? Whereas Mr. Hobbs says no,
20 that's not the way it happened. It came into the front
21 of my van.

22 MR. GINSBURG: No. He said the door, Your
23 Honor.

24 COURT: He said the door.

25 MR. GINSBURG: Ms. Langrehr said the front --

1 MR. CAGAN: Where he --

2 MR. GINSBURG: Ms. Langrehr said the door --

3 MR. CAGAN: Where he made the --

4 COURT: Ms. Langrehr said --

5 MRS. LANGREHR: It was like at the --

6 COURT: The front.

7 MR. CAGAN: Please, don't.

8 COURT: Ms. Langrehr said the bumpers were
9 meeting.

10 MR. GINSBURG: Yeah.

11 MR. CAGAN: Where he made the two -- okay.
12 Where he made the two connections was like this. Okay?
13 But where Mr. Dodson made the connection was -- and he
14 pointed to it -- was back here on the vehicle.

15 And he said it was almost straight up, as a
16 T-bone type of collision, rather than as a turning
17 collision.

18 So there's definite conflict between the two.
19 And if you can believe Mr. Dodson, who is seated in
20 that rear seat. Not right at the window. With his
21 view obstructed by the door post. Saw what was going
22 on below him because the van is obviously than the car.
23 All vans are higher than cars. So he would have had to
24 have been looking out the window and down at what was
25 going on.

1 MR. GINSBURG: Your Honor, the only two
2 people who agreed at the point of impact --
3 coincidentally, happened to have been the two drivers.
4 Mr. Hobbs and Mr. Langrehr, if you remember, both
5 testified that the point of impact was the corner of
6 the vehicle -- the corner of the vehicle -- and the
7 door of the van.

8 And one witness had it up by the wheel. Mrs.
9 Langrehr had it up at the corners of the vehicle. Mr.
10 Dodson had it closer to where he was sitting. Ah -- it
11 just goes to show you that we're still where we were at
12 the end of the case, which is -- everything is -- is --
13 there's no reason not believe any of the witnesses.

14 Ah, we do know one thing, Your Honor. That -
15 - that, ah, the witnesses for the Plaintiff are married
16 to each other. And --

17 COURT: Well, but Mr. Hobbs and Mr. Dodson
18 worked together for sixteen years, or something. I
19 mean, that --

20 MR. GINSBURG: Well, I guess that's like a
21 marriage.

22 COURT: Exactly.

23 MR. GINSBURG: I guess I see more people in
24 my --

25 COURT: Apparently, they car pooled for --

1 for many, many years.

2 MR. GINSBURG: Well, I don't know that that
3 was the testimony, but --

4 COURT: Well, I don't want to cut anybody
5 off, but -- but -- I'm afraid the Counsel will have to
6 work with what they're given, and you can't be there
7 when the accident happens, you just have to be there to
8 present it.

9 Anything else, Mr. Cagan?

10 MR. CAGAN: No, Your Honor.

11 COURT: Mr. Ginsburg?

12 MR. GINSBURG: No, Your Honor.

13 COURT: Alright. In my opinion, I'm going to
14 credit Mr. and Mrs. Langrehr's testimony that they were
15 not shifting -- ah, drifting.

16 Ah, it's possible. Mr. Hobbs obviously has
17 an interest in testifying in that way. And while I
18 understand that, to him, appearing to drift and
19 drifting -- with respect to the Interrogatory answer is
20 the same thing -- ah, I -- I think, perhaps, even if
21 they had drifted just a little bit, he probably cut it
22 too short. That's what I think.

23 By the same token, I cannot accept Mr.
24 Langrehr's testimony, as bolstered by the medical
25 reports, that these medicals proximately were caused by

1 this accident.

2 This was a kiss. Mrs. Langrehr was already
3 injured. Maybe she overreacted. Of course, the
4 Defendant takes the Plaintiff as he finds her, but I
5 simply cannot accept, as a -- as a common sense point
6 of view, that she could have had headaches and neck
7 pain proximately caused by this contact. I simply
8 can't accept that.

9 MR. GINSBURG: Thank you.

10 COURT: Therefore, the judgment's going to be
11 on the property damage claim only. Namely, two hundred
12 eighty-six dollars and thirty cents.

13 MR. CAGAN: Thank you, Your Honor.

14 COURT: Thank you.

15 MR. CAGAN: Your Honor, I would -- this has
16 nothing to do with the case, and I'm not expecting you
17 to -- I'm not going to file any motion for a rehearing
18 or a new trial.

19 But I want Your Honor to understand that --
20 speaking from my own personal experience, having been
21 involved in a minor accident with no visible property
22 damage. No property damage whatsoever to either car.
23 It is absolutely one hundred percent possible to suffer
24 -- being dazed, being injured -- severe headaches.

25 And for that to continue for a period of

1 anywhere from a month to a month and a half because of
2 the way a person may be seated in a car and the impact
3 jostling their body.

4 And I'm talking -- I'm not talking about an
5 old person. I'm talking about a young man. I was
6 young at one time. Ten years ago, when that happened
7 to me. And I was seated in another attorney's car at
8 the intersection of Mount Royal where -- before they
9 changed that intersection up near the Meyerhoff, and --
10 you may know him -- Alan Silverburg (phonetic) was
11 driving.

12 I was seated next to him. I'm a little bit
13 of a back seat driver. I leaned forward to see traffic
14 coming from the left and we started off and immediately
15 stopped. Three miles an hour. And the car in back of
16 us tapped us at no more than two or three miles an
17 hour. It did no visible damage.

18 I got out of the car and I thought I was
19 going to pass out. I really -- as a matter of fact,
20 the policeman wanted to call an ambulance, but Alan
21 said he would take me home. At that time.

22 And the next morning, I couldn't get my head
23 off the pillow --

24 COURT: Well, I think that's --

25 MR. CAGAN: At that time --

1 COURT: That's what the proximate cause rule
2 is all about.

3 MR. CAGAN: I just --

4 MR. GINSBURG: Your Honor, I --

5 MR. CAGAN: I just --

6 MR. GINSBURG: Just give me an opportunity to
7 check something.

8 MR. CAGAN: For future reference --

9 MR. GINSBURG: There was never any claim made
10 for property damage in this case.

11 MR. CAGAN: No. He's right. There never
12 was.

13 MR. GINSBURG: There wasn't --

14 MR. CAGAN: Because I didn't file on behalf
15 of Mr. Langrehr, Your Honor.

16 MR. GINSBURG: There was never any claim,
17 Your Honor.

18 MR. CAGAN: I wanted that --

19 COURT: Well, was it on the --

20 MR. CAGAN: I wanted it into evidence to show
21 that there was an impact. That was the primary reason.

22 MR. GINSBURG: But -- but --

23 MR. CAGAN: And Counsel is --

24 MR. GINSBURG: But the testimony of causation
25 between the estimate and the accident --

1 COURT: Okay.

2 MR. GINSBURG: There's no claim for property

3 --

4 COURT: Then -- then you're not entitled to

5 the two eighty --

6 MR. CAGAN: No. Not according to your

7 ruling, we're not, Your Honor.

8 COURT: Okay. Then judgment is going to be

9 in favor of the Defendant.

10 MR. GINSBURG: Thank you, Your Honor.

11 MR. CAGAN: Well, I would ask you to find on

12 the liability as to us --

13 COURT: But I can't --

14 MR. CAGAN: But no damages.

15 COURT: But I can't.

16 MR. CAGAN: You can.

17 COURT: I cannot. Don't you understand that

18 a cause of action for negligence --

19 MR. CAGAN: Your Honor, juries --

20 COURT: Requires --

21 MR. CAGAN: Juries do it all the time --

22 COURT: A breach of duty?

23 MR. CAGAN: Yes.

24 COURT: Owed to the Plaintiff.

25 MR. CAGAN: Right.

1 COURT: And injury proximately caused by it.

2 MR. CAGAN: No.

3 COURT: And I find that there's no injury
4 here.

5 MR. CAGAN: Excuse me. May I correct the
6 Court on that?

7 COURT: Please.

8 MR. CAGAN: And be as polite as possible.

9 COURT: Please. Correct me.

10 MR. CAGAN: The rule is, that you've got to
11 have a duty and breach of duty. The damages come
12 after.

13 Many a jury -- many a jury has found that --

14 COURT: Juries --

15 MR. CAGAN: No, no, no, no, no. You act as a
16 jury. The Judge and jury --

17 COURT: But I don't make the mistakes that a
18 jury makes.

19 MR. CAGAN: No, no, no. That's not a
20 mistake.

21 MR. GINSBURG: Well, you're right. If
22 there's no damages, that's -- there's --

23 COURT: There's -- there's no claim.

24 MR. GINSBURG: That's right.

25 MR. CAGAN: That doesn't mean that there's no

liability.

1
2 MR. GINSBURG: It's the three legs -- the
3 three legs of the stool --

4 MR. CAGAN: No. Wrong.


5 MR. GINSBURG: You need duty, duty breached,
6 and damages.

7 COURT: Well, let's go off the record.

8 (Tape stopped)
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C E R T I F I C A T E

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3
4 I, Susanne S. Trimmer, official court
5 transcriber for the District Court of Maryland, do
6 hereby certify that the foregoing testimony was taken
7 before Judge Andre M. Davis, on the second day of May,
8 1990, and that said testimony has been reduced to
9 typewriting by me, and that the foregoing transcript
10 is a correct and accurate record of the proceedings,
11 herein, to the best of my knowledge and belief.
12
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Susanne S. Trimmer
July 12, 1990

8

NOV 24 1989 AT 1 30 P

PARTIES
Plaintiff: BETTY LANGREHR CONSTABLE SERVICE
 1627 S. Hanover Street
 Baltimore, Maryland 21230

Defendant(s):
 1 EPHRAIM HOBBS
 2400 Brookfield Ave.
 Balto., Md. 21217

APPEAL BY *Plt. 6-1-90*
 PAPERS TRANSMITTED TO
 BALTIMORE CITY COURT

TRANSCRIPT ORDERED

ATTORNEYS
 Plaintiff - Name, Address & Telephone No.
 Daniel W. Cagan, Esq.
 1 E. Lexington St., #201
 Baltimore, Md. 21202
 (301) 727-5565

For Defendant:
 #1 David B. Ginsburg
 6708 Alexander Bell Dr.
 Columbia Md. 21046
 (1-800-451-464)

Tel # _____ Address _____
 Name _____
 Address _____
 Name _____
 Address _____

JUDGMENT

AFFIDAVIT Judgment Principal... *286.30*
 DEFAULT Pre Judgment Interest... *0*
 CONSENT Total Judgment... *286.30*
 CONFESSION Costs...
 CONTESTED Attorney Fees...
 EXPARTE Post Judgment Interest legal rate
 IN REM Post Judgment Interest contractual rate until date of maturity of contract; legal rate thereafter (CJ 11-106).
 FOREIGN

in favor of *Plaintiff*
 against *Defendants*
 Date *5/2/90* Judge *Alldredge*

Judgment and Notice Pursuant to Rule 3-306 and 3-601 mailed. Date/Initials

AFFIDAVIT Judgment Principal...
 DEFAULT Pre Judgment Interest...
 CONSENT Total Judgment...
 CONFESSION Costs...
 CONTESTED Attorney Fees...
 EX PARTE Post Judgment Interest legal rate
 IN REM Post Judgment Interest contractual rate until date of maturity of contract; legal rate thereafter (CJ 11-106).
 FOREIGN

in favor of *Defendant*
 against *Plaintiff*
 Date *5/2/90* Judge *Andre M. Davis*

Judgment and Notice Pursuant to Rule 3-306 and 3-601 mailed *MAY 2 1990*

DATE	PLT DEF	PAR TIES	RE ISSUE	ADD DEFT	NOT COMPLETED	RE OPENED	APPROVED	PARTIES NOTIFIED
1-22-90								
3-13-90								
5/2/90								

FILED

AUG 8 1990

CLERK OF DISTRICT COURT FOR BALTIMORE CITY

90215 022

DATE	Judgment Recorded	<i>CL 117523</i>
	Notice of Lien Filed	
	Satisfaction Filed	

DATE	DESCRIPTION OF PAPERS	CO
9-7-89	INITIAL FILING	9-14-89 25
	TORT	
	PLAINTIFF'S INTERROGATORIES FILED	
10/23/89	DEFENDANT'S INTERROGATORIES FILED	
10/23/89	Defense filed #1	
12/28/89	Def. subp. issued 4s 30.	
	JUDGE GEORGE J. HELINSKI	
	<i>net atty - del atty</i>	
	<i>1-17-90 delts. subp. to Interrog</i>	

VS.

CASE #

DATE	DESCRIPTION OF PAPERS	COSTS
7-90	Pliffs. One to Interrog.	
7-90	Deft. #1 subp. issued 9s	15.00
13 1990	REEL 74689 BEGINNING AT 1706 ENDING AT 1791	

Parties app.

Judge Andre M. Davis

1/14/90	1 subp issued for Deft. 9s	15.00
18 2 1990	REEL 74970 BEGINNING AT 0001 ENDING AT 005004	

Parties app.

Judge Andre M. Davis

1-90	appeal cost District Court	10.00
	50.00 deposit on transcript	
	80.00 check for Circuit Court	



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

RECEIVED
1ST DISTRICT COURT
1988 SEP 17 3:04 PM
CIVIL

LOCATED AT (COURT ADDRESS)

501 E. Fayette St.
Baltimore, Md. 21202

COMPLAINT \$2,500 or under over \$2,500

Clerk: Please docket this case in an action of contract tort replevin detinue.

The particulars of this case are:

CASE NO.
CV 01029217-89

BETTY LANGREHR
162 1/2 S. Hanover Street
Baltimore, Maryland 21230

EPHRAIM HOBBS
2400 Brookfield Ave.
Balto., Md. 21217

For that on or about September 16, 1986 at or about 5:15 p.m., the Plaintiff was a passenger in an automobile being driven in a careful and prudent manner by her husband. Said automobile was stopped at a red light on Reedbird Avenue in Baltimore City, State of Maryland when suddenly, without any warning, a van owned and operated by the Defendant, and being driven in a negligent manner, proceeded to make a left turn from Hanover St., on to Reedbird Avenue. The Defendant did not properly negotiate his turn and struck the Plaintiff's vehicle on the left front side. The Plaintiff claims that the Defendant was negligent in that he failed to keep his vehicle under proper control, failed to properly make his turn, and failed to keep a lookout for the Plaintiff's vehicle.

As a result of the accident, the Plaintiff was thrown in and about the vehicle, she was caused to suffer severe and painful injury, she was caused to

(See Continuation Sheet) 107 #01-01

#06547 0230 901 115:34

The Plaintiff claims:

- \$ 10,000.00 plus interest of \$ 27.16 and attorney's fees of \$ plus court costs.
- Return of the property and damages of \$ for its detention in an action of replevin.
- Return of the property, or its value, plus damages of \$ for its detention in action of detinue.
- Other and demands judgement for relief.

Daniel W. Cagan, Esq.
1 E. Lexington St., #201
Baltimore, Md. 21202
(301) 727-5565

Daniel W. Cagan Signature of Plaintiff's Attorney
Telephone Number: (301) 727-5565

APPLICATION AND AFFIDAVIT IN SUPPORT OF JUDGEMENT

There are attached the documents indicated which contain sufficient detail as to liability and damage to apprise the Defendant clearly of the claim against the Defendant, including the amount of any interest claimed.

- Properly authenticated copy of any note, security agreement upon which claim is based
- Itemized statement of account
- Interest Work Sheet
- Vouchers
- Check
- Other written document
- Verified itemized repair bill or estimate

I HEREBY CERTIFY: That I am the Plaintiff of the plaintiff herein and am competent (Owner/Partner/Agent/Officer)

to testify to the matters stated herein, which are made on my personal knowledge; that there is justly due and owing by the Defendant to the Plaintiff the sum set forth in the Complaint.

That

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the above Complaint are true and I am competent to testify to these matters. The Defendant is not now in the military service, as defined in the Soldier's and Sailor's Civil Relief Act of 1940 with amendments, nor has been in such service within thirty days hereof.

Date

Signature of Affiant

RECEIVED
DISTRICT COURT M.D.
1ST DISTRICT-CIVIL
1989 SEP 20
3:04

BETTY LANGREHR
1627 S. Hanover Street
Baltimore Maryland 21230

IN THE DISTRICT COURT

Plaintiff

OF MARYLAND

vs.

EPHRAIM HOBBS
2400 Brookfield Avenue
Baltimore, Maryland 21217

FOR

Defendant

BALTIMORE CITY

* * * * *

INTERROGATORIES

TO: EPHRAIM HOBBS, DEFENDANT

FROM; BETTY LANGREHR, PLAINTIFF

You are requested to answer the following
Interrogatories under oath, and these noted conditions will
apply:

a. These Interrogatories are continuing in character,
so as to require the filing of supplementary answers if
further or different information is obtained before trial.

b. Where the name or identity of a person is requested,
please state the full name, home address, and also business
address, if known.

c. Unless otherwise indicated, these Interrogatories
refer to the time, place and circumstances of the occurrence
mentioned or complained of in the statement of claim.

d. Where "knowledge", "information" or "possession" of
a party is requested, such request includes knowledge,

information or possession of the party's agents, representatives and unless privileged, his attorneys. When answer is made by a corporate defendant, state the name, address and title of the person supplying the information, and making the affidavit, and the source of his information.

e. The pronoun "you" refers to the party to whom these Interrogatories are addressed, and the persons mentioned in clause "d".

1. Give the names and home and business addresses of all persons known to you who were eyewitnesses to the occurrence and state the location of each said person at the time of the occurrence so far as is known to you.

2. Give a concise statement of the facts as to how you contend that the occurrence took place, including the time of the occurrence, and their respective speeds, positions, directions and locations of all vehicles involved during their approach to the occurrence and at the time of the occurrence.

3. If you contend that the Plaintiffs acted in such a manner as to cause or contribute to the occurrence, give a concise statement of the facts upon which you rely.

4. If you contend that the injuries and disability now complained of by the Plaintiffs was the result of prior or subsequent injuries or illnesses, give a concise statement of the facts upon which you rely.

5. State the names and addresses of all persons from whom you have signed statements, attaching to your answers, a copy of any signed statement in your control given by the Plaintiffs propounding these Interrogatories.

6. State whether you have within your possession or control photographs, plats or diagrams of the scene or objects connected with said occurrence. If the answer to this Interrogatory is in the affirmative, state the date or dates on which such photographs, plats or diagrams were made and identity of the subject or object shown in each such photograph, plats or diagram.

7. State whether you have within your possession or control or have knowledge of, any transcripts of testimony in any proceeding arising out of the occurrence, and if so, state the date, of the subject matter, the name and business address of the person recording said testimony and the name and address of the person who presently has possession of each said transcript of testimony.

8. Have you ever been convicted of a crime other than for violations of motor vehicle laws? If so, state the crime of which you were convicted, including the date and location of each conviction.

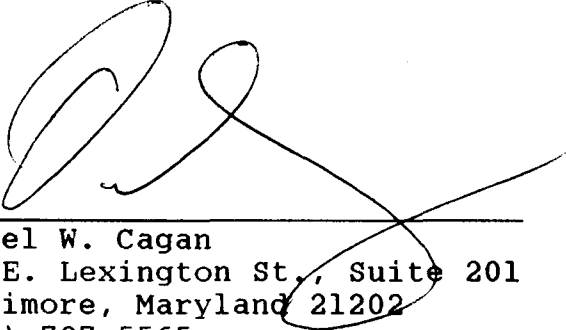
9. State the itinerary of your vehicle, including the time and place of the beginning of the trip, the time and duration of each stop, the place of destination, and expected time of arrival.

10. State whether you consumed any alcoholic beverage or took any drug or medication within eight (8) hours prior to said occurrence, the place where same was obtained, and the nature and amount thereof, and name all persons present at the time the consumption was made.

11. State the facts upon which you base your defense that you were not negligent.

12. State your full name, including alias or aliases, if any, your present address and previous address for the past five (5) years, date of birth, marital status, and social security number.

13. Name all expert witnesses you intend to call at the trial of this case and attach to your answers any written reports by said experts.



Daniel W. Cagan
One E. Lexington St., Suite 201
Baltimore, Maryland 21202
(301) 727-5565

Attorney for Plaintiff

cont'd. - page 2

incur the medical expenses for the treatment of said injuries.

The Plaintiff claims that all of her injuries are due to the negligence of the Defendant without any negligence on her part contributing thereto.

APPEAL
6-1-90

EXPIRES
7-31-90 40519



DISTRICT COURT OF MARYLAND FOR BALTO. CITY 101/27/90

Located at 501 E. FAYETTE ST. Court Address Case No. 29 217-89
(M/V - Criminal - Civil)

BETTY LANGREAR

VS.

EPHRAIM HOBBS

Full Name of Plaintiff(s)

Full Name of Defendant(s)

REQUEST FOR CASSETTE TRANSCRIPT

Please prepare a cassette/transcript of the above entitled case and bill to:

DANIEL CAGAN

Name

1 E. LEXINGTON ST. SUITE 201

Number and Street

Apt.#

BALTO. MD. 21202

City

State

Zip

6-6-90

Date

DANIEL CAGAN

Signature of Applicant

CASE # 2921789

07/27/90

DISTRICT #01-01

#46177 C120 R02 T11:18

CVL ACTN 184.00

CASE # 2921789

DISTRICT #01-01 Telephone #46178 C120 R02 T11:22

VOID N.U. 0 #

CVL ACTN 184.00

CASE # 2921789

Judge A. DAVIS

Att'y for Deft. D. GINSBERG

DISTRICT #01-01

#46177 C120 R02 T11:24

TRANSCRIPT 184.00

RECEIVED

DISTRICT COURT #1

AM 10:32

MD.

TRANSCRIBER INFORMATION

Court Location CIVIL

Appeal Date (If Applicable) 6-1-90

Att'y for Pltf. D. CAGAN

Trial Date 5-2-90

Judge A. DAVIS

Att'y for Deft. D. GINSBERG

Reel No. 74970 Beginning 0001 Ending

Reel No. Beginning Ending

Reel No. Beginning Ending

Transcriber Comments

INVOICE

117 Pages @ \$2.00 per page \$ 234.00

Cassette @ \$10.00 \$

Additional Cassette(s) @ \$5.00 ea. \$

Less Deposit \$ 50.00

Balance Due \$ 184.00

Susan S. Tremmer

Transcriber

Transcriber

Transcriber

Paid

Date

Date

Clerk

DCA 27 (Rev. 3/85)

Distribution: White—Court

Canary—Applicant

Blue—Accounting

Pink—Transcriber

Goldenrod—Accounting

appellate court (Baltimore City Court), until these costs are paid. If the bill is not paid by 7-30-90 the court will sua sponte dismiss the appeal pursuant to Maryland Rule 1313 (Appeals from the District Court - When Lower Court May Strike Order for Appeal).

APPEAL
6-1-90

EXPIRES
7-31-90 40519



DISTRICT COURT OF MARYLAND FOR BALTO. CITY

Located at 501 E. FAYETTE ST. Court Address Case No. 29 217-89 City/County (M/V - Criminal - Civil)

BETTY LANGREAR

VS.

EPHRAIM HOBBS

Full Name of Plaintiff(s)

Full Name of Defendant(s)

REQUEST FOR CASSETTE TRANSCRIPT

Please prepare a cassette/transcript of the above entitled case and bill to:

DANIEL CAGAN

Name

1 E. LEXINGTON ST. SUITE 201

Number and Street

Apt.#

BALTO, MD. 21002

City

State

Zip

6-6-90

Date

DANIEL CAGAN

Signature of Applicant

727-5565

Telephone

TRANSCRIBER INFORMATION

Court Location CIVIL
Appeal Date (If Applicable) 6-1-90
Att'y for Pltf. D. CAGAN

Trial Date 5-2-90
Judge A. DAVIS
Att'y for Deft. D. GINSBURG

Reel No. 74970 Beginning 0001 Ending 2015
Reel No. Beginning Ending
Reel No. Beginning Ending

Transcriber Comments

INVOICE

117 Pages @ \$1.50 per page \$ 234.00
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Less Deposit \$ 50.00
Balance Due \$ 184.00

Susan S. Trimmer

Transcriber

Transcriber

Transcriber

Paid Date

Date

Clerk



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St., Balto., Md. 21202 Case No. CV010-29217-89

STATE OF MARYLAND OR

RECEIVED City/County 1ST DISTRICT CIVIL Trial Date 1990 JUN -1 PM 2:27

BETTY LANGREHR Name

EPHRAIM HOBBS Name

Address

Address

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

MOTION

DEAR MADAM CLERK:

Please enter an Appeal in the above captioned case.

5-290

74970

0001

2015

CASE # 2921785

06/01/90 DISTRICT #01-01 #26545 C230 R01 TIT15

APPEALS TRANSCRIPT 50.00

Request Hearing on Motion.

June 1, 1990

Date

Handwritten signature of Daniel W. Cagan

Daniel W. Cagan Signature 1 E. Lexington Street, Suite 201, Balto., Md. 21202 (301) 727-5565 Telephone No.

CERTIFICATE OF SERVICE

I certify that I served a copy of this Motion upon the following party or parties by mailing first class mail, postage prepaid, on... to:

Date

David G. Ginsburg, Esq.

Name

6708 Alexander Bell Drive, Columbia, Md. 21046

Address

Name

Address

Name

Address

Date

Signature of Party Serving

ORDER

It is hereby ORDERED that:

- the relief requested be granted. the hearing on Motion be set for.

Date

Judge



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St. - 21202 Case No. CU01029217-89

Court Address

BETTY LANGREHR
Name
1627 S. Hanover Street
Address
Baltimore, Maryland 21230

Plaintiff/Judgment Creditor

EPHRAIM HOBBS
Name
2400 Brookfield Avenue
Address
Baltimore, Maryland 21217

Defendant/Judgment Debtor

- Original Summons
Renewal

- Serve by Sheriff
Send by restricted delivery mail.
Return to Plaintiff to serve.

REQUEST FOR SUMMONS

Please issue the summons in this case for EPHRAIM HOBBS at the above verified address.

9/7/89
Date

Daniel W. Cagan
Plaintiff's Attorney
1 E. Lexington St., Balto., Md. 21202
Address 727-5565

WRIT OF SUMMONS

The trial date in this case has been scheduled.

NOV 24 1989 AT - 1 30 PM

You are summoned to appear for trial on ... at the location shown above. If you intend to be present at the trial, you must file the Notice of Intention to Defend within 15 days of receiving this Complaint. Failure to file the Notice of Intention to Defend may result in a judgment by default or the granting of the relief sought.

SEP 12 1989

Lonnie P. Ferguson
Clerk

Must be served by OCT 13 1989

Return must be made promptly and in any event within the time during which the person served must respond to process.



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St., Balto., Md. 21202 Court Address

City/County

RECEIVED
U.S. DISTRICT COURT
1ST DISTRICT
CIVIL

Case No. CV 010-29217-89

STATE OF MARYLAND
OR

Trial Date
1990 JUN -1 PM 2:27

BETTY LANGREHR
Name

EPHRAIM HOBBS
Name

Address

Address

vs.

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

MOTION

DEAR MADAM CLERK:

Please enter an Appeal in the above captioned case.

Request Hearing on Motion.

June 1, 1990

Date


Daniel W. Cagan
1 E. Lexington Street, Suite 201, Balto.,
Md. 21202
(301) 727-5565

Signature

Address

Telephone No.

CERTIFICATE OF SERVICE

I certify that I served a copy of this Motion upon the following party or parties by mailing first class mail, postage prepaid, on _____ to:

Date

David G. Ginsburg, Esq.

6708 Alexander Bell Drive, Columbia,
Md. 21046

Name

Address

Name

Address

Name

Address

Date

Signature of Party Serving

ORDER

It is hereby ORDERED that:

the relief requested be granted.

the hearing on Motion be set for _____

Date

Judge



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St., Baltimore, Md. 21202

DISTRICT COURT M.D.

City/County

Case No. CV010-29217-89

STATE OF MARYLAND OR

1990 JUN Trial Date 27

BETTY LANGREHR Name

EPHRAIM HOBBS Name

Address

Address

vs.

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

MOTION

DEAR MADAM CLERK:

Please enter an Appeal in the above captioned case.

Request Hearing on Motion.

June 1, 1990

Date

Handwritten signature of Daniel W. Cagan

Daniel W. Cagan

Signature

1 E. Lexington Street, Suite 201, Balto., Md. 21202

Address

(301) 727-5565

Telephone No.

CERTIFICATE OF SERVICE

I certify that I served a copy of this Motion upon the following party or parties by mailing first class mail, postage prepaid, on... to:

Date

David G. Ginsburg, Esq.

Name

6708 Alexander Bell Drive, Columbia, Md. 21046

Address

Name

Address

Name

Address

Date

Signature of Party Serving

ORDER

It is hereby ORDERED that:

- the relief requested be granted.
the hearing on Motion be set for.

Date

Judge

NOV 24 1989 AT 1 30 PM

PARTIES

Plaintiff: BETTY LANGREHR CONSTABLE SERVICE
1627 S. Hanover Street
Baltimore, Maryland 21230

VS.

Defendant(s): EPHRAIM HOBBS
2400 Brookfield Ave.
Balto., Md. 21217

TR

Return
10/2/89

APPEAL BY Plt. 6-1-90
PAPERS TRANSMITTED TO
BALTIMORE CITY COURT

~~NO BOND FILED.~~

~~TRANSCRIPT ORDERED~~ Date

ATTORNEYS

Plaintiff - Name, Address & Telephone No.
Daniel W. Cagan, Esq.
E. Lexington St., #201
Baltimore, Md. 21202
(301) 727-5565

Tel # Address Name Address Name Address
For Defendant: #1 David B. Ginsburg Name
Tel # 6708 Alexander Bell Dr. Address
Columbia Md. 21046 Name
Tel # (1-800-454464) Address

JUDGMENT

- AFFIDAVIT Judgment Principal... 286.30
- DEFAULT Pre Judgment Interest... 0
- CONSENT Total Judgment... 286.30
- CONFESSION Costs.....
- CONTESTED Attorney Fees.....
- EX PARTE Post Judgment Interest legal rate
- IN REM Post Judgment Interest contractual rate until date of maturity of contract; legal rate thereafter (CJ 11-106).
- FOREIGN

in favor of Plaintiff
against Defendant

5/2/90 Alld
Date Judge

Judgment and Notice Pursuant to Rule 3-306 and 3-601 mailed..... Date/Initials

- AFFIDAVIT Judgment Principal.....
- DEFAULT Pre Judgment Interest.....
- CONSENT Total Judgment.....
- CONFESSION Costs.....
- CONTESTED Attorney Fees.....
- EX PARTE Post Judgment Interest legal rate
- IN REM Post Judgment Interest contractual rate until date of maturity of contract; legal rate thereafter (CJ 11-106).
- FOREIGN

in favor of Defendant
against Plaintiff

5/2/90 Alld JAN 22 1990
Judge Andre W. Davis

DATE	PLT/DEFT	PARTIES	RE-ISSUE	ADD DEF	NOT COMPLETED	RE OPENED	APPROVED	PARTIES NOTIFIED	BY
1-22-90									
3-13-90									
5/2/90	✓								

CONSOLIDATED WITH.....

DATE	Description
	Judgment Recorded
	Notice of Lien Filed
	Satisfaction Filed

DATE	DESCRIPTION OF PAPERS	COSTS
9-7-89	INITIAL FILING	9-14-89 25.00
	TORT	
	PLAINTIFF'S INTERROGATORIES FILED	
	DEFENDANT'S INTERROGATORIES FILED	
10/23/89	Defense filed #1	
12/28/89	Plt. subp. issued	4s 30.00
2-2-1990	2448	
	plct atty - def atty	
	JUDGE GEORGE J. HELINSKI	

VS.

CASE #

DATE	DESCRIPTION OF PAPERS	COSTS
12-90	Plf's. Ans. to Interrog.	
1-90	Delt. #1 subp. issued 9s	15.00
1-1990	REEL 74689 BEGINNING AT 85785 ENDING AT 1791	
	Parties app.	Judge Andre M. Davis
1/14/90	1 subp issued for Delt. 9s	15.00
1-2 1990	REEL 74970 BEGINNING AT 8001 ENDING AT 80584	
	Parties app.	Judge Andre M. Davis
1-90	appeal costs District Court	10.00
	50.00 deposit on transcript	
	80.00 checks for Circuit Court	



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., MD. 21202 Case No. 29217-89

Court Address

BETTY LANGREHR

Plaintiff/Judgment Creditor

vs.

EPHRAIN HOBBS

Defendant/Judgment Debtor

Trial Date 5/2/90 Issue Date 4/16/90 Expiration Date 5/2/90 Received From County

1:30 P.M. REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

APRIL 16, 1990

MAB

Date

Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Vincent Dodson on 4-19-90 11:55 AM

Title

Date

Time

Description of Defendant: Race Sex Ht

Age

Other

and left with him a copy of the Complaint and all supporting papers.

I posted the premises at

I was unable to serve because

I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

I served an Order to Appear for Oral Examination in Aid of Enforcement by restricted delivery mail, return card attached delivery to

I served a Show Cause Order by restricted delivery mail, return card attached delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

4-19-90

P. Busio #41

Date

Signature

Title

Time

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address One E. Lexington St., Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Hobbs Serve on

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

Serve in county

XX Serve on

~~City State Zip~~

~~Address~~

~~City State Zip~~

~~Sex Ht~~

~~XXXXXX~~

~~Special Instructions~~

VINCENT DODSON

1210 MYRTLE AVENUE

BALTO., MD. 21217

ATTEMPT

- 1 4-18 9:55 AM Date/Time
- 2 Date/Time
- 3 Date/Time
- 4 Date/Time

1990 APR 17 AM 10:53



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., MD. 21202 Case No. 29217-89

Court Address

BETTY LANGREHR

Plaintiff/Judgment Creditor

VS.

EPHRAIN HOBBS

Defendant/Judgment Debtor

Trial Date 5/2/90 Issue Date 4/16/90 Expiration Date 5/2/90 Received From County

1:30 P.M. REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

Case No.

Type of Paper SUBPOENA

If service is not effected, send refund to:

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

APRIL 16, 1990

Date

Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Vincent Dodson on 4-19-90 11 AM

Description of Defendant: Race Sex Ht. Wt. Age Other

and left with him a copy of the Complaint and all supporting papers.

I I posted the premises at

I I was unable to serve because

I I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

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I I served a Show Cause Order by restricted delivery mail, return card attached delivery to

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4-19-90 Signature #41 Title

Time Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address One E. Lexington St., Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Hobbs Serve on

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

Serve in county.

XX Serve on

Garnishee/Agent

Address

City, State, Zip

Serve in County

Special Instructions

VINCENT DODSON 1210 MYRTLE AVENUE BALTO., MD. 21207

ATTEMPT

Table with 4 rows and 2 columns: Attempt number (1-4) and Date/Time.



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., MD. 21202 Case No. 29217-89

Court Address

BETTY LANGREHR

Plaintiff/Judgment Creditor

VS.

EPHRAIM HOBBS

Defendant/Judgment Debtor

Trial Date 5/2/90 Issue Date 4/16/90 Expiration Date 5/2/90 Received From County

1:30 P.M. REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

Case No.

Type of Paper SUBPOENA

If service is not effected, send refund to:

Date Title ON Date Time Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to Name

Title ON Date Time

Description of Defendant: Race Sex Ht

Age Other

and left with him a copy of the Complaint and all supporting papers.

I posted the premises at

I was unable to serve because

I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

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If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Date Signature Title

Time Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address One E. Lexington St., Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Hobbs Serve on

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

Serve in county.

Serve on

Garnishee/Agent

Address

City, State, Zip

Serve in County

Special Instructions

CELEST DODSON

11 MYRTLE AVENUE

ATTEMPT

Table with 4 rows for recording attempts, columns for attempt number and date/time.



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., MD 21202 Case No. 29217-89

Court Address

BETTY LANGREHR

Plaintiff/Judgment Creditor

VS.

EPHRAIN HOBBS

Defendant/Judgment Debtor

Trial Date 5/2/90 Issue Date 4/16/90 Expiration Date 5/2/90 Received From County

3:30 P.M. REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

Case No.

Type of Paper SUBPOENA

If service is not effected, send refund to:

Date Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Name

Title

ON

Date

Time

Description of Defendant: Race Sex Ht.

Age Other

and left with him a copy of the Complaint and all supporting papers.

I posted the premises at

I was unable to serve because

I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

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I served a Show Cause Order by restricted delivery mail, return card attached delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Date

Signature

Title

Time

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address One E. Lexington St., Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Hobbs

Serve on

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

Serve in county.

XX Serve on

Garnishee/Agent

Address

City, State, Zip

Serve in County

Special Instructions

CELLO DODSON 1210 MYRTLE AVENUE BALTO., MD. 21217

ATTEMPT

Table with 4 rows and 2 columns: Attempt number (1-4) and Date/Time.



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., MD. 21202 Case No. 29217-89

Court Address

STATE OF MARYLAND

VS

EPHRAIN HOBBS

Defendant

OR

BETTY LANGREHR

Address

Plaintiff

Telephone

CC#

SUBPOENA

STATE OF MARYLAND BALTIMORE City/County: XXXXX

TO: Vincent Dodson
1210 Myrtle Avenue
Baltimore, MD 21217 (Baltimore City)

YOU ARE HEREBY SUBPOENAED to appear in person before The District Court of Maryland at the above location on May 2, 1990 at 1:30 o'clock P.M.

- To testify in the above case.
To answer to the charge(s) in the above case.
To answer to the State of Maryland for failing to obey a court order as follows:
To produce the following documents:

This Subpoena was requested by David B. Ginsburg, Esquire whose address is 6708 Alexander Bell Drive, Columbia, MD 21046 and whose telephone number is 1(800) 451-1464

Failure to obey this Subpoena may result in your being charged with contempt of court and being taken into custody under a warrant or body attachment.

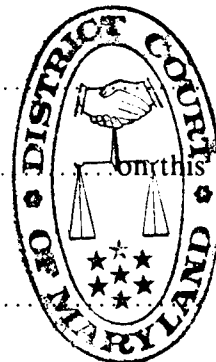
4/16/90

Date

MAB

Clerk/Judge

Vincent Dodson



I certify that I delivered the original of this Subpoena to

19th day of April, 1990

1155 A.M.

Constable # 41

Signature

P. Busse

Title

DESCRIPTION OF PERSON SUBPOENAED: Driver's License #
Sex Race Ht. Wt. Hair Eyes
Complexion Other



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., MD. 21202 Case No. 29217-89

Court Address

STATE OF MARYLAND

VS

EPHRAIN HOBBS

Defendant

or

BETTY LANGREHR

Address

Plaintiff

Telephone

CC#

SUBPOENA

STATE OF MARYLAND BALTIMORE City/County

TO: Vincent Dodson
1210 Myrtle Avenue
Baltimore, MD 21217 (Baltimore City)

YOU ARE HEREBY SUBPOENAED to appear in person before The District Court of Maryland at the above location on May 2, 1990 at 1:30 o'clock P.M.

- To testify in the above case.
To answer to the charge(s) in the above case.
To answer to the State of Maryland for failing to obey a court order as follows:

- To produce the following documents:

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whose address is 6708 Alexander Bell Drive, Columbia, MD 21046
and whose telephone number is 1(800) 451-1464

Failure to obey this Subpoena may result in your being charged with contempt of court and being taken into custody under a warrant or body attachment.

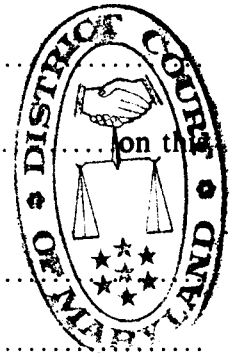
4/16/90 Date

MAB Clerk/Judge

I certify that I delivered the original of this Subpoena to
day of, 19

Signature

Title



DESCRIPTION OF PERSON SUBPOENAED: Driver's License #
Sex Race Ht. Wt. Hair Eyes
Complexion Other



DISTRICT COURT OF MARYLAND FOR BALTO. CITY

City/County

Located at 501 E. FAYETTE ST. Case No. 010-29217-89

Court Address

STATE OF MARYLAND

BETTY LANGREHR OR

EPHRAIM HOBBS

VS.

Plaintiff

Defendant

TRIAL OR HEARING NOTICE

TO: [Redacted]

[] Notice of intent to defend has been filed by [Redacted]

[Redacted] in the above case. The trial is set for [Redacted] at [Redacted]. You must be prepared for trial on this date.

[X] The trial date in the above case has been changed to MAY 2, 1990 at 1:30 P.M.

You are hereby summoned to appear at the above location.

[] Hearing on Motion to be held [Redacted] at [Redacted]

[] If Motion results in trial, trial [] will be held the same day [] will be rescheduled.

[] Continuation of oral examination to be held on [Redacted] at [Redacted]

[] Case has been continued to an indefinite date. You will be notified.

MAR. 14, 1990 Date

DORIS J. GILLIS Clerk

Copies mailed to:

(1) DANIEL W. CAGAN ONE E. LEXINGTON ST., #201 BALTO., MD. 21202

(2) DAVID B. GINSBURG 6708 ALEXANDER BELL DR. COLUMBIA, MD. 21046

(3) [Redacted]

(4) [Redacted]



DISTRICT COURT OF MARYLAND FOR Baltimore City

City/County

Located at Fayette & Gay Street, Baltimore, Case No. CV01029217-89
Court Address MD. 21202

Trial Date 3/13/90 1:30 p.m.

BETTY LANGRIEHR

HOBBS

VS.

Plaintiff

Defendant

MOTION

Dear Mr. Clerk:

Daniel W. Cagan, Attorney for the Plaintiff, respectfully requests that the above captioned case be postponed as he was suddenly taken ill and is under a doctor's care. David Ginsburg, Attorney for the Defendant, has no objection to a postponement of this matter. Also, we request permission to call the Court for this matter to be reset by mutual agreement.

Date March 13, 1990

CERTIFICATE OF SERVICE

I certify that I served a copy of this Motion upon the following party or parties by mailing first class mail, postage prepaid, on March 13, 1990:

David Ginsberg, Esquire

Name

Address

Name

Address

Name

Address

March 13, 1990

Date

Daniel W. Cagan Attorney

ORDER

GRANTED

3/13/90

Date

Judge Andre M. Davis

Judge

P.B. 4/1/95
4



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. FAYETTE ST., BALTIMORE, MD 21201 Case No. 29217-89

Court Address

BETTY LANGREHR

VS. EPHRAIN HOBBS

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

Trial Date 3/13/90

Issue Date 2/21/90

Expiration Date 3/13/90

Received From

County

Case No.

REQUEST FOR SERVICE

Please serve the attached process on the person shown.

Type of Paper

Subpoena

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

2/21/90
Date

MAB
Clerk

PROOF OF SERVICE

I CERTIFY

that I served a Summons by restricted delivery mail, return card attached delivery to

Description of Defendant: Name Title Date Time Race Sex Ht.

Wt. Age Other

and left with him a copy of the Complaint and all supporting papers.

I posted the premises at

I was unable to serve because no such address

I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

I served an Order to Appear for Oral Examination in Aid of Enforcement by restricted delivery mail, return card attached delivery to

I served a Show Cause Order by restricted delivery mail, return card attached delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

2/23/90
Date

P. Bussie # 41
Signature

Title

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address One E. Lexington Street, Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Ephrain Hobbs

Serve on

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

XXX Serve on

XXXXXXXXXXXX

XXXXXX

XXXXXXXXXX

XXXXXXXXXXXX

VINCENT DODSON

1016 PENNSYLVANIA AVENUE

BALTIMORE, MARYLAND 21201

ATTEMPT

1 2/23 11:35 AM
Date/Time

2
Date/Time

3
Date/Time

4
Date/Time

RECEIVED
DISTRICT COURT MD.
1990 FEB 22 AM 11:24



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. FAYETTE ST., BALTIMORE, MD 21201 Case No. 20217-89

Court Address

BETTY LANGREHR

VS. EPHRAIM HOBBS

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

Trial Date 3/13/90 Issue Date 2/21/90 Expiration Date 3/13/90 Received from County

1:30 P.M. REQUEST FOR SERVICE

Case No. Type of Paper Subpoena

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

2/21/90 Date

MMAAS Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Description of Defendant: Name Title on Date Time Race Sex Ht.

Wt. Age Other

I and left with him a copy of the Complaint and all supporting papers.

I I posted the premises at

I I was unable to serve because

I I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

I I served an Order to Appear for Oral Examination in Aid of Enforcement by restricted delivery mail, return card attached delivery to

I I served a Show Cause Order by restricted delivery mail, return card attached delivery to

If my return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Date Signature Title

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address 1. Lexington Street, Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Ephraim Hobbs

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

Serve on Garnishee/Agent

Address

City, State, Zip

Special Instructions

Table with 4 rows for ATTEMPT, Date/Time

Handwritten note: 1:30 P.M.

Handwritten number: 4



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at ... BALTIMORE, MD 21201 ... Case No. ... 17-89

BETTY LANGREHR

VS.

EPHRAIN HOBBS

Trial Date 3/13/90 Issue Date 2/21/96 Expiration Date 3/13/96 Received from ... County ... Case No. ...

Please serve the attached process on the person shown.

ORDER FOR SERVICE

Type of Paper ... subpoena

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

Date 2/21/96 Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Description of Defendant: Race ... Sex ... Ht. ...

Age ... Other ...

I and left with him a copy of the Complaint and all supporting papers.

I I posted the premises at

I I was unable to serve because

I I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

I I served an Order to Appear for Oral Examination in Aid of Enforcement by restricted delivery mail, return card attached delivery to

I I served a Show Cause Order by restricted delivery mail, return card attached delivery to

return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Serve on

Garnishee/Agent

Address

City, State, Zip

Special Instructions

Date

Signature

Title

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff

Plaintiff's Attorney Daniel Cagan

Address ... on Street, Ste. 201

City, State, Zip BALTIMORE, MD 21202

Defendant David B. Ginsburg for Ephrain Hobbs

Serve on

Address 6700 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

ATTEMPT

1 Date/Time

2 Date/Time

3 Date/Time

4 Date/Time



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. FAYETTE ST., BALTIMORE, MD 21201 Case No. 00017-89

BETTY LANGREHR

VS. EPHRAIN HOBBS

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

Trial Date 3/13/90 Issue Date 2/21/90 Expiration Date 3/13/90 Received from County Case No.

REQUEST FOR SERVICE

Type of Paper subpoena

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

2/21/90 Date

[Signature] Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Name Title On Date Time Description of Defendant: Race Sex Ht.

Wt. Age Other

I and left with him a copy of the Complaint and all supporting papers.

I I posted the premises at

I I was unable to serve because

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restricted delivery mail, return card attached delivery to

I I served a Show Cause Order by restricted delivery mail, return card attached

delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Serve on

Garnishee/Agent

Address

City, State, Zip

Special Instructions

Date Signature Title

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff Betty Langrehr

Plaintiff's Attorney Daniel Cagan

Address One E. Lexington Street, Ste. 201

City, State, Zip Baltimore, MD 21202

Defendant David B. Ginsburg for Ephrain Hobbs

Address 6708 Alexander Bell Drive

City, State, Zip Columbia, MD 21046

Table with 4 rows and 2 columns: ATTEMPT, Date/Time



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at FAYETTE & GAY STS., BALTIMORE, MD21202 Case No. 29217-89

Court Address

STATE OF MARYLAND

VS

EPHRAIN HOBBS

Defendant

OR

BETTY LANGREHR

Plaintiff

Address

Address

- Return to Plaintiff to be served.
Serve by Sheriff or Constable.
Serve by Mail (criminal only).

SUBPOENA TO TESTIFY

STATE OF MARYLAND... BALTIMORE... City XXXXXX

TO: VINCENT DODSON
1016 PENNSYLVANIA AVENUE
BALTIMORE, MD 21201
(BALTIMORE CITY)

YOU ARE HEREBY SUBPOENAED to appear in person before the District Court of Maryland at the above location on March 13, 1990 at 1:30 o'clock P.M. to testify for the Defendant

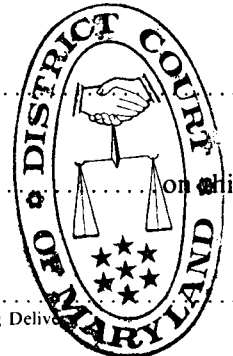
You are also commanded then and there to produce the following documents:

This Subpoena was requested by David B. Ginsburg, Esquire
whose address is 6708 Alexander Bell Drive, Columbia, MD 21046
and whose telephone number is 1 (800) 451-1464

FAILURE TO OBEY THIS SUBPOENA MAY RESULT IN AN ATTACHMENT BEING ISSUED FOR YOUR ARREST. YOU ARE LIABLE FOR A FINE IF YOU FAIL TO OBEY THIS SUBPOENA WITHOUT SUFFICIENT EXCUSE

2/21/90
Date

mar
Clerk/Judge



I certify that I delivered the original of this Subpoena to on this day of, 19

Date

Signature of Person Making Delivery

Title

NOTICE TO ATTORNEY: If you are subpoenaing witnesses in this case, please provide their names to the clerk of the court.



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at FAYETTE & GAY STS., BALTIMORE, MD21202 Case No. 29217-89

STATE OF MARYLAND

VS

EPHRAIN HOBBS

OR

BETTY LANGREHR

Plaintiff

Defendant

Address

Address

- Return to Plaintiff to be served.
Serve by Sheriff or Constable.
Serve by Mail (criminal only).

SUBPOENA TO TESTIFY

STATE OF MARYLAND... BALTIMORE... City/County

TO: VINCENT DODSON
1016 PENNSYLVANIA AVENUE
BALTIMORE, MD 21201
(BALTIMORE CITY)

YOU ARE HEREBY SUBPOENAED to appear in person before the District Court of Maryland at the above location on March 13, 1990 at 1:30 o'clock M. to testify for the Defendant.

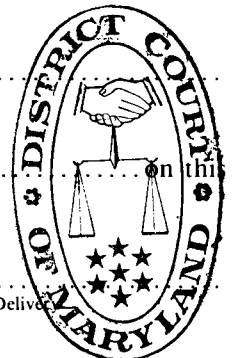
You are also commanded then and there to produce the following documents:

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FAILURE TO OBEY THIS SUBPOENA MAY RESULT IN AN ATTACHMENT BEING ISSUED FOR YOUR ARREST. YOU ARE LIABLE FOR A FINE IF YOU FAIL TO OBEY THIS SUBPOENA WITHOUT SUFFICIENT EXCUSE

3/21/90 Date

mar Clerk/Judge



I certify that I delivered the original of this Subpoena to... day of... 19...

Date

Signature of Person Making Delivery

Title

NOTICE TO ATTORNEY: If you are subpoenaing witnesses in this case, please provide their names to the clerk of the court.



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at FAYETTE & GAY STS., BALTIMORE, MD21202 Case No. 29217-89

STATE OF MARYLAND

VS

EPHRAIN HOBBS

OR

BETTY LANGREHR

Plaintiff

Defendant

Address

Address

- Return to Plaintiff to be served.
Serve by Sheriff or Constable.
Serve by Mail (criminal only).

SUBPOENA TO TESTIFY

STATE OF MARYLAND... BALTIMORE... City/County

TO: VINCENT DODSON
1016 PENNSYLVANIA AVENUE
BALTIMORE, MD 21201
(BALTIMORE CITY)

YOU ARE HEREBY SUBPOENAED to appear in person before the District Court of Maryland at the above location on March 13, 1990 at 1:30 o'clock P.M. to testify for the Defendant

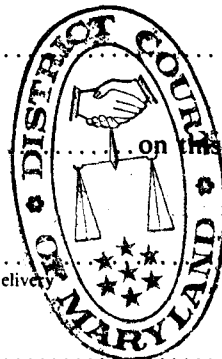
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whose address is 6708 Alexander Bell Drive, Columbia, MD 21046
and whose telephone number is 1 (800) 451-1464

FAILURE TO OBEY THIS SUBPOENA MAY RESULT IN AN ATTACHMENT BEING ISSUED FOR YOUR ARREST. YOU ARE LIABLE FOR A FINE IF YOU FAIL TO OBEY THIS SUBPOENA WITHOUT SUFFICIENT EXCUSE

3/21/90
Date

mar
Clerk/Judge



I certify that I delivered the original of this Subpoena to...
day of..., 19...

Date

Signature of Person Making Delivery

Title

NOTICE TO ATTORNEY: If you are subpoenaing witnesses in this case, please provide their names to the clerk of the court.

LAW OFFICES
CAGAN & GANN
SUITE 201
ONE EAST LEXINGTON STREET
BALTIMORE, MARYLAND 21202

DANIEL W. CAGAN (301) 727-5565
WILLIAM S. GANN (301) 244-0100

January 9, 1990

OF COUNSEL
GERALD A. ZIMLIN

Clerk,
District Court of Maryland
for Baltimore City
501 E. Fayette Street
Baltimore, Maryland 21202

Re: Langrehr vs. Hobbs
Case No.: CV010-29217-89
T/Date: 1/22/90 - 1:30 p.m.

Dear Madam Clerk:

Regarding the above captioned case, enclosed please
find answers to Interrogatories which I would appreciate
your filing among the Court documents.

Your cooperation in this matter is appreciated.

Very truly yours,

CAGAN & GANN


Daniel W. Cagan

DWC:sw
Encl:
cc: David G. Ginsburg, Esq.

RECEIVED
DIST. COURT MD.
JAN 22 1990

BETTY LANGREHR

Plaintiff

vs.

EPHRAIM HOBBS

Defendant

*

*

*

*

*

IN THE

DISTRICT COURT

FOR

BALTIMORE CITY

Case: CV010-29217-89

* * * * *

ANSWERS TO INTERROGATORIES

Now comes the Plaintiff, Betty Langrehr, by and through her attorney, Daniel W. Cagan, and for Answers to Interrogatories propounded by the Defendant, says:

a. The information supplied in these Answers to Interrogatories is not based solely on the knowledge of the executing party, but includes the knowledge of the party, her agents, representatives and attorneys, unless privileged.

b. The word usage and sentence structure may be that of the attorney assisting in the preparation of these Answers and does not necessarily purport to be the precise language of the executing party.

Interrogatory No. 1: Give a concise statement of the facts as to how you contend that the occurrence took place, including in detail the respective speeds, positions, locations and directions of the vehicles involved during their approach to, at the time of, and immediately after the collision.

Answer No. 1: My husband and I were at the red light at a complete stop when a turning van turning sharply struck us in the left front of our car. The vehicles stayed in the same place

until we hailed the police. This happened at the corner of Cherry Hill Road and Hanover Street.

Interrogatory No. 2: Give the names and addresses of all eyewitnesses to all or part of the occurrence complained of, and describe the location of each at the time of the occurrence.

Answer No. 2: Franklin Langrehr, myself, the police officer, (a report was not written), and the Defendant, Mr. Hobbs.

Interrogatory No. 3: State the names and addresses of the persons who have given you signed statements or recorded reports concerning such occurrence, the date of each statement and the name and address of the person who took such statement. Attach hereto a copy of any statement made by the Defendant.

Answer No. 3: Franklin Langrehr, 425 Annabel Avenue, Baltimore, Maryland 21225, October 29, 1989.

Interrogatory No. 4: If you consumed any alcoholic beverages, or taken any drugs or medication within eight (8) hours prior to said occurrence, state the kind and quantity you consumed, the names and addresses of all persons present when you consumed them.

Answer No. 4: Not applicable.

Interrogatory No. 5: State with precision and in detail all injuries you allege were caused in this occurrence and/or aggravations of prior conditions or diseases.

Answer No. 5: Post traumatic headaches, tenderness in the mid-cervical spine.

Interrogatory No. 6: State the names and addresses of all physicians and hospitals who have examined or treated you for injuries and/or aggravations of prior conditions or diseases you claim were caused by this incident, and state the dates of each examination or treatment.

Answer No. 6: On September 4, 1986, I was involved in a work-related accident. I sustained injuries to my left knee and left hand. Drs. Propper/Young, Patriots Plaza Office Building, 8055 Ritchie Highway, Pasadena, Maryland 21122, dates of treatment, 9/18/86, 1/29/87 and 4/23/87; Mercy Hospital, 301 St. Paul Place, Baltimore, Maryland 21202, 9/17/86; Union Memorial Hospital, 201 E. University Parkway, Baltimore, Maryland 21218, 3/14/88.

Interrogatory No. 7: Name all experts whom you propose to call as witnesses and attach to your Answers copies of all written reports. If such reports are not available, state the name, address, and qualification of said expert witness, including educational background; degrees; specialties; board certification and the subject matter that his or her testimony will relate to, the substance of the facts and opinions to which he or she is expected to testify, including a summary of the grounds of each such opinion.

Answer No. 7: Dr. Michael Propper and Dr. Henry Young, both located at Patriots Plaza Office Building, 8055 Ritchie Highway, Pasadena, Maryland 21122; South Baltimore General Hospital, 3001 S. Hanover Street, Baltimore, Maryland 21230.

Interrogatory No. 8: If you have any present complaints on account of the injuries sustained in this occurrence and/or aggravations of prior conditions or diseases, state in detail the nature of the present complaints.

Answer No. 8: I still have constant pain in my left shoulder.

Interrogatory No. 9: State which of your injuries sustained in this occurrence and/or aggravations of prior conditions or diseases you claim to be permanent.

Answer No. 9: My left shoulder.

Interrogatory No. 10: If you have ever been hospitalized other than on account of this accident, state the dates of hospitalization, the name and address of the hospital, and the nature of the injury, disease or occasion.

Answer No. 10: November 24, 1986, automobile accident, Shock Trauma, University Hospital, 22 S. Greene St., Baltimore, Maryland 21201, broken knee cap.

Interrogatory No. 11: If you have been involved in any other accidents, sustained other accidental injuries before or after the incident complained of in this case, state in details, including date, place of occurrence, nature of any injuries sustained, names and addresses of the parties involved, and names and addresses of your attending physicians, dentists or hospital.

Answer No. 11: 11/24/86, automobile accident, Ritchie Highway & 16th Avenue; left knee; Edward Fink, myself and individual who hit me. University Hospital, 22 S. Greene St.,

Baltimore, Maryland 21201.

Interrogatory No. 12: By whom were you employed and what were your duties and rate of compensation at the time of the occurrence? If you claim to have lost time or income from such employment as a result of the injuries sustained in this accident, state precisely the dates of absence from employment and the amount of wages or income lost.

Answer No. 12: Not applicable.

Interrogatory No. 13: Give an itemized statement, attaching copies of all itemized bills, of all items of monetary loss or damage suffered by you as a result of the accident complained of, including medical and other expenses, but excluding loss of earnings stated in response to Interrogatory No. 12 above.

Answer No. 13: Michael S. Propper, M.D., \$290.00, Henry A. Young, M.D., \$250.00, Physical Therapy Associates, \$455.00, Dr. Angell & Associates, \$36.00, South Baltimore General Hospital, \$85.44, Hanover Emergency Services, Inc., \$110.00, Harbor Radiologists, P.A., \$28.00.

Interrogatory No. 14: If you filed an income tax return with the Director of Internal Revenue for any of the last five (5) years, state for what years filed, the office of the Director of Internal Revenue with which said return was filed, and the amount reported in each income tax return as earned income.

Answer No. 14: I filed Income Tax Returns for the years 1987 and 1988 with the Internal Revenue Service, Philadelphia, Pa. 19255 and Comptroller of Treasury, Annapolis, Maryland. We

reserve the right to furnish the additional three (3) years at a later date.

Interrogatory No. 15: If you have been convicted of a criminal charge (other than a minor traffic violation), state the nature thereof, the court in which you were convicted and the date thereof.

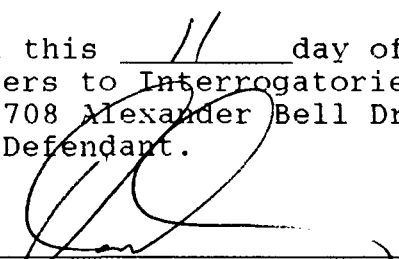
Answer No. 15: Not applicable.

I HEREBY DECLARE AND AFFIRM under the penalties of perjury that the above Answers to Interrogatories are true and correct to the best of my knowledge, information and belief.


Betty Landwehr

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11 day of January, 1990, a copy of the foregoing Answers to Interrogatories was mailed to David G. Ginsburg, Esquire, 6708 Alexander Bell Drive, Columbia, Maryland 21046, attorney for Defendant.


Daniel W. Cagan
1 E. Lexington Street, #201
Baltimore, Maryland 21202
(301) 727-5565

Attorney for Plaintiff

BETTY LANGREHR

Plaintiff

vs.

EPHRAIM HOBBS

Defendant

* IN THE
* DISTRICT COURT
* FOR
* BALTIMORE CITY
* Case No. CV 010-29217-89

1999 JAN 13
DISTRICT COURT

* * * * *

ANSWERS TO INTERROGATORIES

Now comes the Defendant, Ephraim Hobbs, by David B. Ginsburg, his attorney, and for Answers to the Interrogatories heretofore filed by the Plaintiff, says:

- (a) The information supplied in these Answers is not based solely on the knowledge of the executing party, but includes the knowledge of the party's agents and attorney, unless privileged.
- (b) The word usage and sentence structure is that of the attorney and does not purport to be the exact language of the executing party.

1. Give the names and home and business addresses of all persons known to you who were eyewitnesses to the occurrence and state the location of each said person at the time of the occurrence so far as is known to you.

ANSWER Vincent Datson, Ed Smith, Thomas Warner, and Marcus Taylor were passengers in my vehicle and eyewitnesses to the occurrence. I do not know their current whereabouts since I no longer work with these gentlemen, and over three (3) years have passed since the date of the accident. I will attempt to locate them and provide this information upon its availability to me.

I also believe the parties to this action witnessed the occurrence.

2. Give a concise statement of the facts as to how you contend that the occurrence took place, including the time of the occurrence, and the respective speeds, positions, directions and location of all vehicles involved during their approach to the occurrence and at the time of the occurrence.

ANSWER The vehicle in which the Plaintiff was a passenger in appeared to have moved forward into the intersection, colliding with my vehicle.

3. If you contend that the Plaintiff acted in such a manner as to cause or contribute to the occurrence, give a concise statement of the facts upon which you rely.

ANSWER No such contention.

4. If you contend that the injuries and disability now complained of by the Plaintiff was the result of prior or subsequent injuries or illnesses, give a concise statement of the facts upon which you rely.

ANSWER Yes since Plaintiff did not appear injured at the time of the accident.

5. State the names and addresses of all persons from whom you have signed statements, attaching to your Answers a copy of any signed statement in your control given by the Plaintiff propounding these Interrogatories.

ANSWER None.

6. State whether you have within your possession or control, photographs, plats, or diagrams of the scene, or objects connected with said occurrence. If the answer is in the affirmative, state the date or dates on which such photographs, plats or diagrams were made, the name and address of the photographer or artists or draftsman, and identify the subject or object shown in each such photograph, plat or diagram.

ANSWER My attorney is in possession of photographs relevant to the occurrence.

7. State whether you have within your control, or have knowledge of any transcripts of testimony in any proceeding arising out of the occurrence. If so, state the date, the subject matter, the name and business address of the person recording said testimony, and the name and address of the person who presently has possession of each said transcript of testimony.

ANSWER None.

8. Have you ever been convicted of a crime other than for violations of the Motor Vehicle Law? If so, state the crime of which you were convicted, including the date and location where convicted.

ANSWER Defendant refuses to answer this improper Interrogatory which requests information beyond the scope of relevance. Evans v. Johns Hopkins University, 224 Md. 23, 167 A.2d 501 (1960). However, without waiving his objection, and in the spirit of Discovery, the Defendant states that his Response is no.

9. State the itinerary of your vehicle, including the time and place of the beginning of the trip, the time and duration of each stop, and the place of destination and the expected time of arrival.

ANSWER Defendant was traveling from work to home at the time of the occurrence.

10. State whether you consumed any alcoholic beverage, medicine, or drug during the 8 hours preceding the occurrence, the nature and amount thereof, and the place or places where such alcoholic beverage, medicine or drug was obtained and/or consumed.

ANSWER None.

11. State the facts upon which you base your defense that you were not negligent.

ANSWER Defendant objects and refuses to answer this improper Interrogatory requesting information determined to be privileged as attorney work product. Thorne v. Good Humor Ice Cream Company of Baltimore, Daily Record, March 16, 1964, (Superior Court of Baltimore City).

12. State your full name, address, date of birth, marital status, social security number, and any other names or aliases which you have used or by which you have been known by.


ANSWER Ephraim Wesley Hobbs, 2400 Brookfield Avenue, Baltimore, Maryland

21217; Date of Birth: 2/22/28; Marital Status: Divorced; Social Security No:
220-20-6722.

13. Name all experts whom you propose to call as witnesses and attach to your Answers copies of all written reports made to you and all correspondence, memoranda and notes addressed to you by any experts whom you propose to call as witnesses.

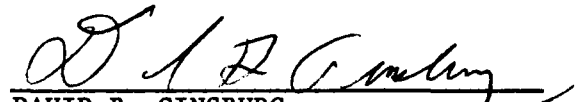
ANSWER Defendant reserves the right to rely upon any expert named by the Plaintiff in this action.

I DO SOLEMNLY DECLARE AND AFFIRM, UNDER PENALTY OF PERJURY, THAT THE CONTENTS OF THE AFOREGOING DOCUMENT ARE TRUE AND CORRECT TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.


EPHRAIM HOBBS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, That on this 12 day of Jun, 1989, a copy of the foregoing Answers to Interrogatories was mailed to Daniel W. Cagan, Esquire, One E. Lexington Street, Suite 201, Baltimore, Maryland 21202, Attorney for Plaintiff.


DAVID B. GINSBURG
Attorney for Defendant
6708 Alexander Bell Drive
Columbia, Maryland 21046
1(800) 451-1464

AI7S2/day



DISTRICT COURT OF MARYLAND FOR

501 E. FAYETTE ST BALTO CITY 21202
Located at

Court Address

City/County

Case No. 29217-89

STATE OF MARYLAND

OR

BETTY LANGREHR

VS.

EPHRAIM HOBBS

Plaintiff

Defendant

TRIAL OR HEARING NOTICE

TO:
.....
.....
.....

Notice of intent to defend has been filed by in the above case. The trial is

set for at You must be prepared for trial on this date.

The trial date in the above case has been changed to MARCH 13, 1990 at 1:30 PM

You are hereby summoned to appear at the above location. AGREED (LAST POSTPONEMENT)

Hearing on Motion to be held at

If Motion results in trial, trial will be held the same day will be rescheduled.

Continuation of oral examination to be held on at

Case has been continued to an indefinite date. You will be notified.

R JAN 30, 1990

Date

Clerk

Copies mailed to:

(1) DANAIEL CAGAN
ONE E. LEXINGTON ST, STE 201
BALTO. 21202

(2) DAVID GINSBURG
6708 ALEXANDER BELL DR
COLUMBIA, MD 21046

(3)

(4)

LAW OFFICES
CAGAN & GANN

SUITE 201
ONE EAST LEXINGTON STREET
BALTIMORE, MARYLAND 21202

DANIEL W. CAGAN (301) 727-5565
WILLIAM S. GANN (301) 244-0100

January 22, 1990

OF COUNSEL
GERALD A. ZIMLIN

Ms. Doris Creager
Clerk, District Court of
Maryland for Baltimore City
501 E. Fayette Street
Baltimore, Maryland 21202

Re: Langrehr vs. Hobbs
Case No.: CV 010-29217-89

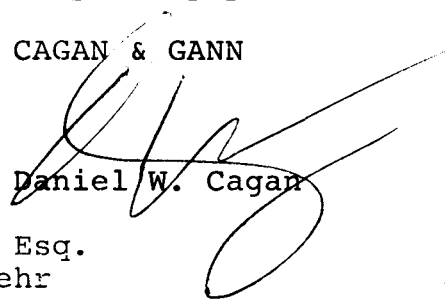
Dear Doris:

This letter will confirm that we have agreed to a trial date in the above case of Tuesday, March 13, 1990 at 1:30 p.m.

Thank you for your assistance.

Very truly yours,

CAGAN & GANN


Daniel W. Cagan

DWC:sw

cc: David Ginsburg, Esq.
Ms. Betty Langrehr

1990

95



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

City/County

Located at 501 E. Fayette St., Balto., Md., 21202. Case No. 29217-89

Court Address

STATE OF MARYLAND

VS EPHRAIM HOBBS

Defendant

or

2400 Brookfield Avenue

Address

BETTY LANGREHR

Baltimore, Maryland 21217

Plaintiff

Telephone

CC#

SUBPOENA DUCES TECUM

STATE OF MARYLAND BALTIMORE City/County

TO: Dr. Michael S. Propper
Patriots Plaza Office Bldg.
8055 Ritchie Highway
Pasadena, Maryland 21122

YOU ARE HEREBY SUBPOENAED to appear in person before The District Court of Maryland at the above location on January 22, 1990 at 1:30 o'clock P.M.

- To answer to the charge(s) in the above case.
To answer to the State of Maryland for failing to obey a court order as follows:

X TO APPEAR
To produce the following documents: all documents, medical records, x-rays, etc., pertaining to Plaintiff, Betty Langrehr, S.S.#: 213-62-7471 regarding an automobile accident which occurred on 9/16/86 & sustained personal injuries

This Subpoena was requested by Daniel W. Cagan as a result of same.
whose address is 1 E. Lexington St., Baltimore, Md. 21202
and whose telephone number is 727-5565

Failure to obey this Subpoena may result in your being charged with contempt of court and being taken into custody under a warrant or body attachment.

12/28/89 Date

MAR
Haven Rago Clerk/Judge



I certify that I delivered the original of this Subpoena to on this 9 day of JANUARY, 1990

Signature
Title

DESCRIPTION OF PERSON SUBPOENAED: Driver's License #
Sex Race Ht. Wt. Hair Eyes
Complexion Other

49



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St., Balto., Md. 21202 Case No. 29217-89

STATE OF MARYLAND

VS EPHRAIM HOBBS

or

BETTY LANGREHR Plaintiff

Defendant 2400 Brookfield Avenue Address Baltimore, Maryland 21217 Telephone

CC#

SUBPOENA

STATE OF MARYLAND BALTIMORE City/County

TO: Dr. Henry Young Patriots Plaza Office Bldg. 8055 Ritchie Highway Pasadena, Maryland 21122

YOU ARE HEREBY SUBPOENAED to appear in person before The District Court of Maryland at the above location on January 22, 1990 at 1:30 o'clock P.M.

- To answer to the charge(s) in the above case.
To answer to the State of Maryland for failing to obey a court order as follows:

X TO APPEAR

To produce the following documents: all documents, medical records, x-rays, etc., pertaining to Plaintiff, Betty Langrehr, S.S.#213-62-7471 regarding an automobile accident which occurred on 9/16/86 and sustained personal injuries as a result of same.

This Subpoena was requested by Daniel W. Cagan whose address is 1 E. Lexington St., Baltimore, Md. 21202 and whose telephone number is 727-5565

Failure to obey this Subpoena may result in your being charged with contempt of court and being taken into custody under a warrant or body attachment.

12/28/89 Date

I certify that I delivered the original of this Subpoena to Juan Lopez on this 9 day of JANUARY, 1990

Handwritten signatures and stamps including 'MAR 30' and '786'.

DESCRIPTION OF PERSON SUBPOENAED: Driver's License # Sex Race Ht. Wt. Hair Eyes Complexion Other



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St., Balto., Md. 21201 Case No. 89

STATE OF MARYLAND

VS

EPHRAIM HORRS

Defendant

2400 Brookfield Avenue

Address

Baltimore, Maryland 21217

Telephone

CC#

BETTY LANGREHR

Plaintiff

SUBPOENA

STATE OF MARYLAND. BALTIMORE. City/County:

TO: DR. HENRY YOUNG
Patriots Plaza Office Bldg.
3055 Ritchie Highway
Pasadena, Maryland 21122

YOU ARE HEREBY SUBPOENAED to appear in person before The District Court of Maryland at the above location on January 22, 1990 at 1:30 o'clock P.M.

- To answer to the charge(s) in the above case.
To answer to the State of Maryland for failing to obey a court order as follows:

X TO APPEAR

- To produce the following documents: all documents, medical records, x-rays, etc., pertaining to Plaintiff, Betty Langrehr, S.S.#213-62-7471 regarding an automobile accident which occurred on 9/16/86 and sustained personal injuries as a result of same.

This Subpoena was requested by Daniel W. Cagan whose address is E. Lexington St., Baltimore, Md. 21202 and whose telephone number is 727-5565

Failure to obey this Subpoena may result in your being charged with contempt of court and being taken into custody under a warrant or body attachment.

12/28/89 Date

MWB Clerk/Judge



I certify that I delivered the original of this Subpoena to on this day of 19

Signature

Title

DESCRIPTION OF PERSON SUBPOENAED: Driver's License # Sex Race Ht. Wt. Hair Eyes Complexion Other

CASE # 2921789

12/26/89

DISTRICT #01-01
#15637 C120 R02 T13:30

SRVC COST 15.00



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St., Balto., Md. 21202. Case No. 9217-88

STATE OF MARYLAND

VS

M. HOBBS Defendant

or

2400 Brookfield Avenue Address

BETTY LANGREHR Plaintiff

Baltimore, Maryland 21217 Telephone

CC#

SUBPOENA DUCES TECUM

STATE OF MARYLAND BALTIMORE City/County:

TO: Dr. Michael S. Propper Patriots Plaza Office Bldg. 8055 Ritchie Highway Pasadena, Maryland 21122

YOU ARE HEREBY SUBPOENAED to appear in person before The District Court of Maryland at the above location on January 22, 1990 at 1:30 o'clock M.

To answer to the charge(s) in the above case.

To answer to the State of Maryland for failing to obey a court order as follows:

TO APPEAR

To produce the following documents: All documents, medical records, x-rays, etc., pertaining to Plaintiff, Betty Langrehr, S.S.#: 213-62-7471 regarding an automobile accident which occurred on 9/16/86 & sustained personal injuries result of same.

This Subpoena was requested by Daniel W. Cagan whose address is E. Lexington St., Baltimore, Md. 21202 and whose telephone number is 727-5565.

Failure to obey this Subpoena may result in your being charged with contempt of court and being taken into custody under a warrant or body attachment.

12/28/89 Date

M. Lang Clerk/Judge



I certify that I delivered the original of this Subpoena to on this day of 19

Signature Title

DESCRIPTION OF PERSON SUBPOENAED: Driver's License # Sex Race Ht. Wt. Hair Eyes Complexion Other

CASE # 2921789

12/26/89

DISTRICT #01-01
#15637 C120 R02 T13:30

SRVC COST 15.00

LAW OFFICES
CAGAN & GANN
SUITE 201
ONE EAST LEXINGTON STREET
BALTIMORE, MARYLAND 21202

DANIEL W. CAGAN (301) 727-5565
WILLIAM S. GANN (301) 244-0100

December 21, 1989

OF COUNSEL
GERALD A. ZIMLIN

Clerk,
District Court of Maryland
for Baltimore City
501 E. Fayette Street
Baltimore, Maryland 21202

Re: Langrehr vs. Hobbs
Case No.: 29217-89

Dear Madam Clerk:

Enclosed please find two (2) Subpoena Duces Tecums regarding the above captioned case which I would appreciate the Sheriff serving.

Also enclosed please find my check in the amount of \$30.00 to cover the cost of this service.

Your cooperation is appreciated.

Very truly yours,

CAGAN & GANN


Daniel W. Cagan

DWC:sw
Encl:



DISTRICT COURT OF MARYLAND FOR

501 E. FAYETTE ST BALTO CITY 21202

City/County

Located at Court Address

Case No. 29217-89

STATE OF MARYLAND

OR

VS.

BETTY LANGREHR

EPHRAIM HOBBS

Plaintiff

Defendant

TRIAL OR HEARING NOTICE

TO:

Notice of intent to defend has been filed by in the above case. The trial is set for at You must be prepared for trial on this date.

The trial date in the above case has been changed to JANUARY 22, 1990 at 1:30 PM

You are hereby summoned to appear at the above location.

Hearing on Motion to be held at

If Motion results in trial, trial will be held the same day will be rescheduled.

Continuation of oral examination to be held on at

Case has been continued to an indefinite date. You will be notified.

R NOV 6, 1989

Date

Clerk

Copies mailed to:

(1) DANIEL CAGAN ONE E. LEXINGTON ST, SIE 201 BALTO 21202

(2) DAVID GINSBURG 6708 ALEXANDER BELL DR COLUMBIA, MD 21046

(3)

(4)

LAW OFFICES
CAGAN & GANN
SUITE 201
ONE EAST LEXINGTON STREET
BALTIMORE, MARYLAND 21202

DANIEL W. CAGAN (301) 727-5565
WILLIAM S. GANN (301) 244-0100

OF COUNSEL
GERALD A. ZIMLIN

November 2, 1989

Clerk,
District Court of Maryland for
Baltimore City
501 E. Fayette Street
Baltimore, Maryland 21202

Re: Langrehr vs. Hobbs
Case No.: 010-29217-89
D/Trial: November 24, 1989 at 1:30 p.m.

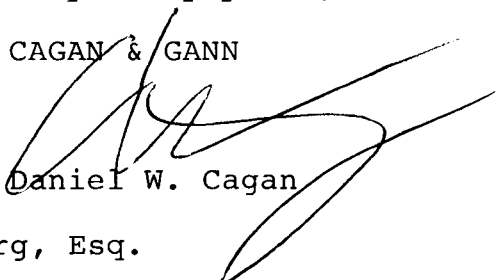
Dear Madam Clerk:

I must request a postponement of the Betty Langrehr case. This case is now scheduled for the day after Thanksgiving. My son is coming in for Thanksgiving vacation from college in Boston. He will only be in for the Thanksgiving weekend. We have planned to take advantage of that and be with him that Friday, the date that this case is set for trial. I would sincerely appreciate the Court's consideration in rescheduling this inasmuch as this is the first date for the trial.

Also, please be advised that I will be on vacation and unavailable between December 21st and December 31st. Please do not schedule this case during that period.

Very truly yours,

CAGAN & GANN


Daniel W. Cagan

DWC:sw
cc: David B. Ginsberg, Esq.

RECEIVED
DIST. COURT MD
NOV 3 10 25 AM '89



DISTRICT COURT OF MARYLAND FOR Baltimore City

Located at 501 E. Fayette St. Court Address Case No. 010-21217-89

STATE OF MARYLAND

Betty Kergelch OR vs. Ephraim Hobbs

Plaintiff

Defendant

TRIAL OR HEARING NOTICE

TO:

Notice of intent to defend has been filed by David B. Ginsberg for Ephraim Hobbs in the above case. The trial is set for Nov. 24, 1989 at 1:30 PM. You must be prepared for trial on this date.

The trial date in the above case has been changed to at

You are hereby summoned to appear at the above location.

Hearing on Motion to be held at

If Motion results in trial, trial will be held the same day will be rescheduled.

Continuation of oral examination to be held on at.

Case has been continued to an indefinite date. You will be notified.

10/26/89 Date

MD Clerk

Copies mailed to:

(1) Daniel W. Cagen 1 E. Lexington St. #201 Baltimore, MD 21202

(2) David B. Ginsberg 6708 Alexander Bell Dr. Columbia, MD 21046

(3)

(4)



DISTRICT COURT OF MARYLAND FOR

Baltimore City

XXXXXX

City/County

Located at 501 E. Fayette St., Baltimore, MD 21202

Court Address

Case No. CV010-29217-89

Trial Date Nov. 24, 1989 @ 1:30 PM

Betty Langrehr

1627 S. Hanover St.

Baltimore, MD 21230

Plaintiff

Ephraim Hobbs

240C Brookfield Avenue

Baltimore, MD 21217

Defendant

VS

Date October 20, 1989

Please enter my appearance of behalf of the Defendant, Ephraim Hobbs, in the above entitled matter. In answer to the Plaintiff's allegations, the Defendant states that he denies liability generally as to both the facts and damages; that the Plaintiff is guilty of assumption of risk; that the Plaintiff is guilty of contributory negligence; and that the Plaintiff's cause of action is barred by the statute of limitations.

RECEIVED
DISTRICT COURT OF MARYLAND
BALTIMORE
OCT 21 1989

Daniel W. Cagan, Esq.
1 E. Lexington St., #201

Baltimore, MD 21202

(301) 727-5565

Address

Telephone No.

David B. Ginsburg

David B. Ginsburg
6708 Alexander Bell Drive

Columbia, MD 21046

1 (800) 451-1464

Address of Attorney

Telephone No.

BETTY LANGREHR

* IN THE

Plaintiff

* DISTRICT COURT

vs.

* FOR

EPHRAIM HOBBS

* BALTIMORE CITY

Defendant

* CASE NO: CV010-29217-89

* * * * *

INTERROGATORIES

TO: PLAINTIFF, BETTY LANGREHR

BY: DEFENDANT, EPHRAIM HOBBS

You are hereby requested to answer the following Interrogatories separately, full, in writing and under oath, in accordance with and as required by the Maryland Rules of Procedure:

(a) These Interrogatories are continuing in character, so as to require you to file Supplemental Answers if you obtain further or different information before trial.

(b) Where the name or identity of a person is requested, please state full name, home address and also business address, if known.

(c) Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the occurrence mentioned or complained of in the pleadings.

RECEIVED
DIST. COURT MD.
1ST DISTRICT - CIVIL
OCT 23 10 39 AM '89

(d) where knowledge or information in your possession is requested, such request includes that of your agents, representatives, and unless privileged, your attorney. When answer is made by a corporate party, state the name, title and address of the person supplying the information and making the Affidavit, and the source of the information.

(e) The pronoun "you" refers to the party to whom these Interrogatories are addressed, and the person mentioned in clause (d) above.

1. Give a concise statement of the facts as to how you contend that the occurrence took place, including in detail the respective speeds, positions, locations and directions of the vehicles involved during their approach to, at the time of, and immediately after the collision.

2. Give the names and addresses of all eyewitnesses to all or part of the occurrence complained of, and describe the location of each at the time of the occurrence.

3. State the names and addresses of the persons who have given you signed statements or recorded reports concerning such occurrence, the date of each statement and the name and address of the person who took such statement. Attach hereto a copy of any statement made by the Defendant.

4. If you consumed any alcoholic beverages, or taken any drugs or medication within eight (8) hours prior to said occurrence, state the kind and quantity you consumed, the

names and addresses of all persons present when you consumed them.

5. State with precision and in detail all injuries you allege were caused in this occurrence and/or aggravations of prior conditions or diseases.

6. State the names and addresses of all physicians and hospitals who have examined or treated you for injuries and/or aggravations of prior conditions or diseases you claim were caused by this incident, and state the dates of each examination or treatment.

7. Name all experts whom you propose to call as witnesses and attach to your Answers copies of all written reports. If such reports are not available, state the name, address, and qualification of said expert witness, including educational background; degrees; specialties; board certification and the subject matter that his or her testimony will relate to, the substance of the facts and opinions to which he or she is expected to testify, including a summary of the grounds of each such opinion.

8. If you have any present complaints on account of the injuries sustained in this occurrence and/or aggravations of prior conditions or diseases, state in detail the nature of the present complaints.

RECEIVED
DISTRICT COURT MD.
1ST DISTRICT DIV.
OCT 23 10 39 AM '89

9. State which of your injuries sustained in this occurrence and/or aggravations of prior conditions or diseases you claim to be permanent.

10. If you have ever been hospitalized other than on account of this accident, state the dates of hospitalization, the name and address of the hospital, and the nature of the injury, disease or occasion.

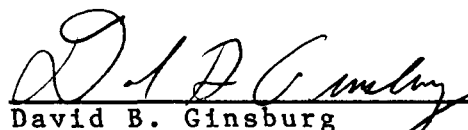
11. If you have been involved in any other accidents, sustained other accidental injuries before or after the incident complained of in this case, state in details, including date, place of occurrence, nature of any injuries sustained, names and addresses of the parties involved, and names and addresses of your attending physicians, dentists or hospital.

12. By whom were you employed and what were your duties and rate of compensation at the time of the occurrence? If you claim to have lost time or income from such employment as a result of the injuries sustained in this accident, state precisely the dates of absence from employment and the amount of wages or income lost.

13. Give an itemized statement, attaching copies of all itemized bills, of all items of monetary loss or damage suffered by you as a result of the accident complained of, including medical and other expenses, but excluding loss of earnings stated in response to Interrogatory No. 12 above.

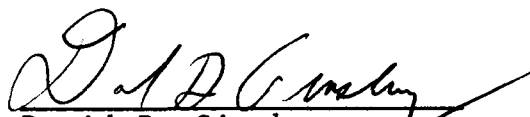
14. If you filed an income tax return with the Director of Internal Revenue for any of the last five (5) years, state for what years filed, the office of the Director of Internal Revenue with which said return was filed, and the amount reported in each income tax return as earned income.

15. If you have been convicted of a criminal charge (other than a minor traffic violation), state the nature thereof, the court in which you were convicted and the date thereof.


David B. Ginsburg
Attorney for Defendant
6708 Alexander Bell Drive
Columbia, Maryland 21046
1 (800) 451-1464

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of October, 1989, a copy of the foregoing Interrogatories was mailed Daniel W. Cagan, Esquire, 1 East Lexington Street, #201, Baltimore, Maryland 21202, Attorney for Plaintiff.


David B. Ginsburg

DBG/sal/15sf11

RECEIVED
DIST. COURT MD.
1ST DIST. CIVIL
OCT 23 10 39 AM '89



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St. - 21202

Court Address

City/County

Case No.

C. Mann

CVO10-29217-89

BETTY LANGREHR

vs.

EPHRAIM HOBBS

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

Trial Date

11-24-89

Issue Date

9-12-89

Expiration Date

10-13-89

Received From

County

REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

Case No.

Type of Paper Complaint-Interrogatories

If service is not effected, send refund to:

9-13-89

Date

[Signature]

Clerk

PROOF OF SERVICE

I CERTIFY

[X] that I served a Summons by [] restricted delivery mail, return card attached [X]

delivery to

[Signature]

Name

on

Date

Time

September 2, 1989 2:45 PM

Title

Description of Defendant: Race Sex Ht

Wt Age Other

[] and left with him a copy of the Complaint and all supporting papers.

[] I posted the premises at

[] I was unable to serve because

[] I served the Writ of Garnishment on Wages on the Garnishee by [] restricted delivery mail, return card attached [] delivery to

[] I served the Writ of Garnishment on Property on the Garnishee by [] restricted delivery mail, return card attached [] delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

[] I served an Order to Appear for Oral Examination in Aid of Enforcement by [] restricted delivery mail, return card attached [] delivery to

[] I served a Show Cause Order by [] restricted delivery mail, return card attached [] delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Sept 2, 1989

Date

[Signature]

Signature

15

Title

Time

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff BETTY LANGREHR

Plaintiff's Attorney Daniel W. Cagan

Address 1627 S. Hanover St.

City, State, Zip Baltimore, Md. 21230

Defendant EPHRAIM HOBBS

[] Serve on

Address 2400 Brookfield Avenue

City, State, Zip Baltimore, Maryland 21217

Serve in _____ county.

CASE # 2921789

09/07/89

DISTRICT #01-01 #06547 0230

SRVC COST 15.00

[] Serve on

Garnishee/Agent

Address

City, State, Zip

Special Instructions:

1	Sept 23 1989	ATTEMPT	11:00 AM
2		Date/Time	
3		Date/Time	
4		Date/Time	



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St. - 21202

Court Address

City/County

Case No.

CV010-29217-89

BETTY LANGREHR

vs.

EPHRAIM HOBBS

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

Trial Date

11-24-89

Issue Date

9-12-89

Expiration Date

10-13-89

Received From

County

REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

Case No.

Type of Paper Complaint-Interrogatorie

If service is not effected, send refund to:

9-13-89

Date

Kostek

Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to [Name]

Title

on

Date

Time

Sept 2, 1989 2:45 PM

Description of Defendant: Race Sex Ht.

Wt Age Other

I and left with him a copy of the Complaint and all supporting papers.

I posted the premises at

I was unable to serve because

I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

I served an Order to Appear for Oral Examination in Aid of Enforcement by restricted delivery mail, return card attached delivery to

I served a Show Cause Order by restricted delivery mail, return card attached delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Date

Signature

Title

Time

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff BETTY LANGREHR

Plaintiff's Attorney Daniel W. Cagan

Address 1627 S. Hanover St.

City, State, Zip Baltimore, Md. 21230

Defendant EPHRAIM HOBBS

Serve on

Address 2400 Brookfield Avenue

City, State, Zip Baltimore, Maryland 21217

Serve in county.

CASE #

28

DE #05

SRVC COST

Serve on

Garnishee/Agent

Address

City, State, Zip

Special Instructions:

ATTEMPT

- 1 Sept 23 1989 Date/Time
2 Date/Time
3 Date/Time
4 Date/Time



DISTRICT COURT OF MARYLAND FOR BALTIMORE CITY

Located at 501 E. Fayette St. - 21202

City/County

Case No. 10-91317

Court Address

BETTY LANGREHR

vs.

EPHRAIM HOBBS

Plaintiff/Judgment Creditor

Defendant/Judgment Debtor

Trial Date 11-21-99

Issue Date 7-12-99

Expiration Date 10-13-99

Received From

County

REQUEST FOR SERVICE

Please serve the attached process on the person shown.

ORDER FOR SERVICE

You are hereby commanded to serve the attached process and to make your return promptly on this Order if served, and if you are unable to serve, you are to make your return on this Order and return the original process to the Court no later than ten days following the termination of the validity of the process.

Case No.

Type of Paper Complaint-Interrogatorie

If service is not effected, send refund to:

Date 7-12-99

Clerk

PROOF OF SERVICE

I CERTIFY

I that I served a Summons by restricted delivery mail, return card attached delivery to

Name

Title

on

Date

Time

11-21-99 2:45 PM

Description of Defendant: Race Sex Ht

Wt Age Other

I and left with him a copy of the Complaint and all supporting papers.

I posted the premises at

I was unable to serve because

I served the Writ of Garnishment on Wages on the Garnishee by restricted delivery mail, return card attached delivery to

I served the Writ of Garnishment on Property on the Garnishee by restricted delivery mail, return card attached delivery to

and promptly after service mailed a copy of the Writ to the Judgment Debtor's last known address.

I served an Order to Appear for Oral Examination in Aid of Enforcement by restricted delivery mail, return card attached delivery to

I served a Show Cause Order by restricted delivery mail, return card attached delivery to

If return is made by an individual other than a sheriff or constable, I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief and do further affirm I am a competent person over 18 years of age and not a party to the case.

Date

Signature

Title

Time

Address if Private Process Server

Telephone Number if Private Process Server

Plaintiff BETTY LANGREHR

Plaintiff's Attorney Daniel W. Cagan

Address 1627 S. Hanover St.

City, State, Zip Baltimore, Md. 21230

Defendant EPHRAIM HOBBS

Address 2400 Brookfield Avenue

City, State, Zip Baltimore, Maryland 21217

Serve in county.

Serve on

Garnishee/Agent

Address

City, State, Zip

Special Instructions:

ATTEMPT

1 Date/Time

2 Date/Time

3 Date/Time

4 Date/Time

*7.8
2-1-10
250 images*

From: Jennifer Hafner
To: Ray Connor, Doris Byrne, Sheila Simms, Edward Papenfuse
Date: Monday, February 01, 2010 12:53:12 PM
Subject:MSA SC 5458-82-150, 1990 cases

These are the remaining 1990 cases. I have updated the work order.

Mayor AND City Council VS LOUDEN Box 1003 Case No. 90211027 [MSA T2691-3640, OR/11/15/36]
File should be named msa_sc5458_82_150_[full case number]-####

DESSESAURE VS ST PAUL RENTALS Box 1003 Case No. 90211028 [MSA T2691-3640, OR/11/15/36]
File should be named msa_sc5458_82_150_[full case number]-####

LANGREHR VS HOBBS Box 1010 Case No. 90215022 [MSA T2691-3647, OR/11/15/43] *7.8 2-1-10
250 images*
File should be named msa_sc5458_82_150_[full case number]-####

OZOLIN VS BOARD OF APPEALS, ET. AL. Box 1060 Case No. 90243035 [MSA T2691-3697, OR/11/16/9]
File should be named msa_sc5458_82_150_[full case number]-####

WILLIAMS VS BD. OF APPEALS, ET. AL. Box 1129 Case No. 90285042 [MSA T2691-3766, OR/11/16/77]
File should be named msa_sc5458_82_150_[full case number]-####

BOST VS DISTANCE Box 1204 Case No. 90331026 [MSA T2691-3841, OR/11/17/68]
File should be named msa_sc5458_82_150_[full case number]-####

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