

file

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ATTORNEYS AND COUNSELLORS
1207 NATIONAL LOAN & EXCHANGE BANK BUILDING
COLUMBIA, SOUTH CAROLINA

PHONE 22118
P. O. BOX 188

July 3, 1935.

Dr. Robert A. Kehoe,
University of Cincinnati,
School of Medicine,
Cincinnati, Ohio.

Dear Dr. Kehoe:

FILE: [REDACTED] vs. Standard Oil Company.

As I wired you from Myrtle Beach, Judge Dennis ordered a mistrial at 10:30 Friday night. The jury was hopelessly tied up, seven being for some verdict the largest \$25,000, and five against giving anything, on the ground that there was no liability on the part of Rowe or the Standard Oil Company. We learn that the jury never would have agreed, no matter how long the Judge kept them out.

This result is a victory for the defense. We felt that the court should have granted our motion for directed verdict, but when he refused the chances were all in favor of a verdict. The other side was in the pleasant position of having an attractive young plaintiff who had what seemed to the jury a serious injury caused by lead poisoning, and a defendant which could pay any judgment rendered.

The result is a great blow to them, and we are somewhat curious to see whether they will press for trial at the next term of Court. We will keep you fully advised.

You were a tremendous help to us in this case, Doctor, and again I wish to thank you for your fine co-operation and congratulate you upon your remarkably clear and intelligent presentation of the facts on the witness-stand. We do not think that we could have presented the defense properly unless you had been so generous with your time and thoughts. For your information we enclose copy of letter we have written Mr. Edwin S. Hall, General Counsel of the Standard Oil Company in New York.

With personal regards, and hoping the next time you are in South Carolina we will have an opportunity of seeing more of you in a social way, we are

Yours sincerely,

BENET, SHAND & MCGOWAN,

By *[Signature]*

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July 3, 1935.

Edwin S. Hall, Esq.,
Standard Oil Company
26 Broadway,
New York, N. Y.

Dear Mr. Hall:

FILE: [REDACTED] vs. Standard Oil Company.

As I know, Robert A. Kehoe came to Columbia on Jun [REDACTED] for a preliminary conference with us, and then came back on Saturday the 22nd before the trial for further conferences here and the Doctors in Florence on Sunday. He went with us from the trial and stayed through Thursday, taking the stand himself on that day as a witness for the defense.

Dr. Kehoe made a splendid impression on the court, jury and spectators. He was moderate in his attitude, clear in his statements, and impressed all with his desire to give the court the benefit of his scientific knowledge in simple language that the jury and the spectators could understand. His testimony was of great value to the defense, and over and above that, his co-operation with the attorneys and medical witnesses could not have been improved upon.

In my long experience in trying cases I have never had an expert witness who made a better impression nor one who helped the attorneys more in the preparation of a case.

I would be very glad if you would indicate our feeling about Dr. Kehoe to the proper officers of the Ethyl Gasoline Corporation.

Yours truly,

BENET, SHAND & MCGOWAN,

By

Christie Benet

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