

Castleman File: American Petroleum Institute
w/c = with cover letter or memo If DATE = 0, undated
CD-ROM Document #: API ~~173~~ ~~172~~ DATE 1991

- ☐ published article from medical journal
- ☐ published article from trade journal
- ☐ published advertisements
- ☐ newspaper article
- ☐ published government report
- ☐ government inspection results
- ☐ unpublished or internal report
- ☐ unpublished presentation from conference
- ☐ letter
- ☐ memorandum
- ☐ industry warning labels
- ☐ industry sales literature
- ☐ industry recommended practices
- ☐ meeting minutes (with attachments)
- ☐ membership list
- ☒ BC notes letter from Baggett Jr

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July 30, 1991

Dr. Barry Castleman
1722 Linden Avenue
Baltimore, Maryland 21217

RE: Shell Documents/ Bonsib Report

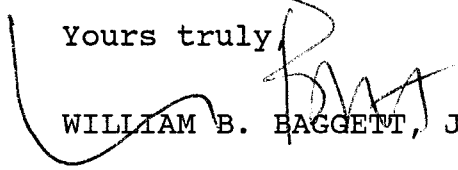
Dear Dr. Castleman:

Paul Henderson introduced us about a month ago while you were Beaumont testifying in one of his asbestos cases. You expressed an interest in some documents I told you about that Hershel Hobson recently obtained from Shell in some of our benzene cases. I believe we also talked about the 1948 API Toxicological review on Benzene. I have enclosed copies of these as well as a few similar documents you may be interested in seeing.

I have also enclosed a copy of "Dust Producing Operations in the Production of Petroleum Products and Associated Activities." We have argued that what Standard Oil did to protect its employees is relevant to show what our clients' employers could reasonably have learned and done about asbestos as early as 1937. Of course, since employers are usually immune from tort liability, this document may not be helpful to plaintiffs in states other than Louisiana. In fact, evidence of employer knowledge could potentially be damaging to a plaintiff's product liability claim.

Once you have a chance to review these materials, I'd really appreciate hearing what you think about them.

Yours truly,


WILLIAM B. BAGGETT, JR.

WBBjr/ct
Encls.