

handed in P.R. during
week of 5/30/49

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FRANK W. MIDDLETON, JR.
ROBERT J. VANDAWORKER

May 24, 1949

POST OFFICE BOX 2070
TELEPHONE 3-3411

Dr. Robert A. Kehoe, Director
Kettering Laboratory of Applied Physiology
College of Medicine
Eden and Bethesda Avenue
Cincinnati, Ohio

Re: [REDACTED] vs. Schuykill
Products Co., Inc.

Dear Dr. Kehoe:

We have your letter of May 3, 1949, and the letter from your secretary dated April 4, 1949, and we understand that you expect to be in Baton Rouge shortly, probably during the first week of June.

We would like very much to take your testimony in this case at that time in view of the fact that specimens of this man's blood and urine have already been examined by you.

We will appreciate it if you will let us know when you expect to be here so that we may make arrangements with opposing counsel for the taking of your deposition. We shall be glad to discuss with you informally at that time the questions raised in your last letter.

Very truly yours,

TAYLOR, PORTER, BROOKS & FULLER

By: *LWB*

LWB:mmm

RE 0007362

N9574

May 3, 1949

Mr. L. W. Brooks,
Taylor, Porter, Brooks, and Fuller,
Louisiana National Bank Building,
Baton Rouge 2, Louisiana.

Dear Mr. Brooks:

Reference to your letter of March 24 and my secretary's reply of April 4 will tell you that I had expected to be in Baton Rouge and to be of such assistance as I could in connection with your case of [REDACTED] vs Schuykill Products Company. It now appears most unlikely that I can be in Baton Rouge before the week in which June 1 occurs. I am not wholly certain that I can make this date, but that is my present tentative program. If this is not satisfactory for your purposes, I shall expect to hear from you.

I dare say you are fully aware of the fact that I am not anxious to appear in connection with the controversies of this company and its employees. I shall lean over backwards, because of the position that I occupy in the courts there, not to show any evidence of the least bias or interest in defending this company, since in my opinion its practices in relation to its employees are utterly barbarian. Because I have not known how to do otherwise I have continued to authorize the analysis of an occasional sample sent to us. Frankly, I prefer not to have anything to do with this situation, since I cannot avoid the feeling that I am involved in a bit of medical connivance and sharpshooting in so doing.

Very truly yours,

Robert A. Kehoe, M. D.

RAK ef

KE 0007863

N9574.01

April 4, 1949

Mr. L. W. Brooks,
Taylor, Porter, Brooks and Fuller,
Louisiana National Bank Building,
Baton Rouge 2, Louisiana.

Dear Mr. Brooks:

Dr. Kehoe has asked that I reply to your letter of March 24, advising that he will certainly be in Baton Rouge at some time during the next sixty days and would prefer the examination in person. He will advise you of the date when it has been set, and will be available for your purposes. However, if you should need to make the examination prior to his anticipated trip, the means suggested in your letter will be quite satisfactory.

Very truly yours,

E. R. Fortlage, Secretary to
Dr. Kehoe

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KE 0007364

N9574.02

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ROBERT J. VANDAWORKER

POST OFFICE BOX 2070
TELEPHONE 3-3411

March 24, 1949

Dr. Robert A. Kehoe,
Kettering Laboratory,
Eden and Bethesda Avenue,
Cincinnati, Ohio.

Dear Dr. Kehoe: [REDACTED] vs. Schuylkill Products
Co., Inc.

We have been employed to defend a workmen's compensation suit filed recently by [REDACTED] against Schuylkill Products Co., Inc. The plaintiff alleges that he is suffering from lead poisoning contracted while in the discharge of his duties as an employee of Schuylkill Products Co., Inc. Specifically he alleges the following:

"While in the scope and performance of his regular duties as a common laborer, petitioner was working the "O" shift, that is, from 11:00 P.M. until 7:00 A.M., and was engaged in his regular work of burning, and was shoveling fuel into a burner when smoke, ashes, lead and fumes from said burner were suddenly blown forceably into his face, eyes, nose and mouth, causing him to inhale said smoke, ashes, fumes and lead and other content of said burner, and to be choked and strangled, and causing him to have to quit his work for a time."

Dr. C. A. Loric of this City is the attending physician. He submitted samples of White's urine and blood to you on several occasions and you examined and reported thereon. We would, therefore, like to take your deposition at a time convenient to you. We are wondering whether or not you are planning to be in Baton Rouge any time within the next 30 or 60 days. If so, perhaps we can arrange to examine you when you are here. If not, we might have to take your deposition by interrogatories and cross-interrogatories. However, we would prefer to examine you in person as we believe that such an examination would be much more satisfactory to all concerned.

With kind personal regards, we are

Yours very truly,

TAYLOR, PORTER, BROOKS & FULLER,

N9574.03

KF 0007365