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COMMERCE TITLE BUILDING
PHONES 8-0557-8-0558
MEMPHIS, TENN.

August 12, 1937

Dr. Robert A. Kehoe,
College of Medicine,
Cincinnati, Ohio.

Dear Doctor:

We have been referred to you by the American Public Health Association, Reginald M. Atwater, M. D., Executive Secretary, relative to getting some information as to working conditions creating lead poisoning, in plants for the manufacture or mixing of paint wherein insufficient ventilation and insufficient safety standards would be present, and assist in creating said conditions.

As you perhaps may be aware, Tennessee does not have any specific law protecting employees on Occupational Diseases, neither does it have any particular Statute protecting employees relative to plant or industrial conditions connected with lead or paint industries.

We have a particular case here which we represent a plaintiff, wherein it is necessary to have a series of depositions answered by an expert, such as yourself, to know the usual and necessary precautions in plants which manufacture paint or use products of lead, so as to show the required safety standard which would have to be had in the ordinary uses of operation of said business, to protect the lives and the health of employees.

As such experts are not present in this part of the country, or known in or about Memphis, and as we have been referred to you by the American Public Health Association relative to such standards, we would highly appreciate if it is possible that you could arrange to answer a series of such depositions in the presence of a Notary Public, and we assure you that this would take a relatively short space of time in said matter.

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No doubt, you realize the importance of this particular case, since it would mean, that is if we can improve and impress the Court and general public of the necessity of improving same, with reference to poisonous or hazardous diseases, that this would eventually culminate in the passage of proper Legislature for protection for the general public and employees as well.

Looking forward to your reply and your cooperation, as this matter comes up in the very near future, I am

Very truly yours

ABE L. ROBERTS


ALR:mj

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