

Raymond Pearce

STANDARD OIL COMPANY OF NEW JERSEY

26 BROADWAY, NEW YORK

October 26 1936

EDWIN S. HALL
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Dr. Robert A. Kehoe
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My dear Doctor Kehoe:-

You will recall that while we were at Wilson, Messrs. MacLean, Reid and others anticipated the plaintiff would call as a witness a Mr. [REDACTED] who would claim he was suffering from lead poisoning resulting from an exposure substantially similar to Pitt's exposure. When I returned to the office I inquired if we had any file on [REDACTED]. We found we have quite a file.

[REDACTED] commenced his employment as a tank wagon driver about the first of the year 1928. He does not seem to have suffered any ill health until the early part of May, 1934, except that in 1933 while washing his tankwagon he slipped and fell striking his side against the can rack fracturing the fifth and sixth ribs on the left side. When he commenced in May, 1934, to show signs of disability, he was sent repeatedly to Dr. C. F. West of Kinston, North Carolina and at one time to a Dr. J. W. Ashby at the State Hospital at Raleigh. I enclose photostatic copies of the medical reports and correspondence concerning Mr. Pearce's illness. It will be very helpful if you will review them and let me have any comments you may care to offer. Please return the enclosures.

The file here does not contain any suggestion that Mr. [REDACTED] is thinking of suing us for lead poisoning. There has been considerable correspondence during which he has sought to perfect a claim against the Equitable Life Insurance Society for permanent disability allowance under the Group Insurance Policy that Company has issued to our Company and our employees. At one time the policy provided for total permanent disability payments but the provision was cancelled out of the policy before Pearce became disabled, if he is in fact disabled.

Mr. MacLean has written me the suggestion that it might be well to have some careful and discreet person, preferably a physician, at Greenville, where Mr. [REDACTED] lives, observe him. I think I would not want to make any attempt at this time to have Mr. [REDACTED] examined because of the danger of suggesting we are fearful he will commence suit. It is my feeling that the result achieved in the Pitt case will very seriously deter [REDACTED] and his counsel from undertaking any litigation.

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I am endeavoring to determine the origin of the instructions which so seriously perplexed us while we were trying the Pitt case. When I have gotten the whole story, I will advise you.

Yours very truly,

William L. Hall

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Enclosure

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