

ROBERT M. HUGHES, JR.
LEON T. SEAWELL
LEON T. SEAWELL, JR.

CABLE ADDRESS HUGHES
POST OFFICE BOX 936

ROBERT M. HUGHES
1855-1940

LAW OFFICES OF
HUGHES, LITTLE & SEAWELL
WAINWRIGHT BUILDING
BUTE & DUKE STREETS

NORFOLK, VIRGINIA

October 23, 1940.

[REDACTED] . Gulf Oil Corp.

Dr. W. F. Mackley,
Research Department,
University of Cincinnati,
Cincinnati, Ohio.

Dear Dr. Mackley:-

We represent the Travelers Insurance Company in the defense of an action which has been brought against the Gulf Oil Corporation by Thomas Jordan, colored. The basis of this action is an alleged lead poisoning while working in cleaning out a tank for the Gulf Oil Corporation about the first of February, 1940. Out of this operation arose two other claims, one for [REDACTED], which we have recently settled, and one for a man named [REDACTED] who died, and we were fortunate enough to effect a reasonable settlement with his estate. In the present case of [REDACTED] however, they are demanding what we think is an unreasonable amount, especially for a colored man, that is \$5,000.

From the files which have been turned over to me I see that you came here to make an investigation and render such assistance as you could in the treatment of these men, and you will probably recall that Dr. W. B. Martin also made an examination of [REDACTED] and [REDACTED]. We have recently secured another examination of this man [REDACTED] and for your information I am enclosing you a copy of Dr. Martin's report.

We are somewhat concerned about the permanency of this man's condition, and I am writing to you to ask if you will be good enough to go over Dr. Martin's report and in the light of your own examination of [REDACTED] give us the benefit of your thought as to whether or not this man will improve and just what his disability may be. Of course, I can very well appreciate the uncertainty of such an opinion especially where you have not the opportunity of a personal examination of him, but in dealing with our opponent we do want to have as definite an opinion as we can so as to know just what disability actually exists.

From the information which has been given to us, this man has not performed any work since last February, and of course his counsel is claiming for him permanent total disability.

We would appreciate very much your writing us on this subject.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Leon P. Seawell". The signature is written in dark ink and is positioned to the right of the typed name "Leon P. Seawell".