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April 13, 1979

Thomas T. Anderson, Law Offices
Palm Springs Branch Office
Suite 7, Professional Park
165 South Civic Drive At
McCallum Way
Palm Springs, California 92262

Attn: Mr. Mike Pierson, Investigator

Dear Mr. Pierson:

I have your letter of April 3, and I hasten to reply, for the reason that I cannot even consider entering into any issue which would involve the likelihood of my having to travel away from my office or home in Cincinnati. It so happens that I have been in substantial retirement for eight years and am partially disabled by several physical ailments including visual impairment, that make it impossible for me to get about alone. I continue to work, slowly, in my office, in an effort to prepare for the publication of experimental work which had not been so prepared at the time of my retirement. This work involves certain definitive issues as to lead poisoning, and it is imperative that it be put together by myself, if possible.

I mention this matter only because it has to do in part with the issue with which you are concerned. For I could if necessary (and I am not seeking employment anywhere) be consulted here in order to give advice and information to whom ever you engage as a witness, or I might give a deposition. I know full well that this is not the best way to handle a difficult case, but it is all I can do, and it might be desirable.

I should say that I am quite dubious as to the cause of the lead poisoning (if it is lead poisoning) in the case you describe, and that is my reason for suspecting that you have a difficult case on your hands. The diagnosis of lead poisoning in the small child, is by no means a simple matter to justify on such evidence as you have described. I realize, of course, that you have been brief in your letter to me, and that the evidence as to lead poisoning and its source may be much better than you have told me. However, such cases are often decided on very flimsy evidence, and so I cannot judge the matter in this instance. It is only on this account that I speak of the possibility of my being involved in this case. I would be wiser, perhaps, and also less responsible if I were to refuse flatly to be involved.

Yours sincerely,

N 24769

Robert A. Kehoe, M.D.
Professor Emeritus of