

July 20, 1964

Re: [REDACTED]

vs. Standard Oil Company
Glasgow, Kentucky

Mr. Uhel O. Barrickman
Richardson, Barrickman and Dickinson
New Farmers National Bank Building
Glasgow, Kentucky

Dear Mr. Barrickman:

The copy of the deposition of Mr. [REDACTED] is, as you are aware, a very indefinite affair, made [REDACTED] the replies of a man who had remarkably few facts in mind about himself or his wife, or was resolved not to provide you with any information.

It seems evident that there had been a leaking tank. It does not appear that Mr. [REDACTED] was ever the victim of illness that could be identified as anything of any significance or of any special character. His wife appears to have had badly swollen (knee) joints. Just how all of this connects up with contaminated well water or the presence therein of gasoline as the contaminant is not apparent from this testimony. I would suppose that these basic facts will be brought out by the plaintiff in some detail, otherwise there would be no case.

As to the complaints, you may be right in believing that Mr. Bybee has been coached by someone, but if that has occurred he has been badly coached or has responded badly to coaching. To be specific, the swelling of the joints, with stiffness and pain, has no relationship to the absorption of lead of any type. The complaint of nervousness and inability to sleep are much too vague to be taken very seriously. They might be due to almost anything - any type of discomfort or worry.

As I suspected, no reference, has been made to any symptoms which would certainly have resulted from swallowing gasoline in any significant quantity.

Your questions gave out no information that could be used by the plaintiff or his advisors, and you should be careful, under the circumstances, that no such information leaks out. In its present form the claim as to illness is obviously false, and being presented without knowledge of what it should be in order to be convincing. This I believe is all I need say at this point, but if you have questions, get them to

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me promptly. I am leaving for the Montana mountains on July 31 and will not be back in my office until September second.

Very truly yours,

RAK:vr

Robert A. Kehoe, M.D.