

August 23, 1937

Mr. Abe L. Roberts
Attorney at Law
Commerce Title Building
Memphis, Tenn.

Dear Mr. Roberts:

This is to acknowledge receipt of your letter of August 12th addressed to Dr. Kehoe. As Dr. Kehoe will be out of the city for some weeks and since you seem anxious to have some word from him, I am taking the liberty of replying to you.

In so far as your request for a deposition on precautions in lead plants is concerned, I am afraid that it will not be possible for you to get Dr. Kehoe, or anyone else, to issue any ex cathedra statements which might in any way apply to your case. Precautions vary widely, depending upon the degree of exposure to lead in the plant. Protective devices which are adequate in one situation could be considered inadequate in another, the same holding true of medical supervision and routine examination. It would seem, therefore, that for one to arrive at an opinion on the case which you now have, it would be necessary for him to visit the plant, inspect the facilities, and also carry out the necessary studies on the plaintiff to establish if he is suffering from lead poisoning.

Very truly yours,

WFM:is

Willard F. Machle, M.D.

ABE L. ROBERTS
ATTORNEY AT LAW
COMMERCE TITLE BUILDING
PHONES 8-0557-8-0558
MEMPHIS, TENN.

August 31, 1937

University of Cincinnati
College of Medicine
General Hospital
Cincinnati, Ohio

Attention: Mr. R. F. Machle, M.D.

Dear Doctor:

This will acknowledge your letter of August 23, in answer to that addressed to Dr. Kehoe, and we note where he will be out of the city for several weeks and that you are replying for him.

We will of course await his return and take up the matter again with him.

Appreciating your suggestions,

Very truly yours

A. L. Roberts
ABE L. ROBERTS

ALR:mj

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