

FILE NAME: Oil Industry and American Petroleum Institute (API)

DATE: 1991 July 20

DOC#: API173

DOCUMENT DESCRIPTION: Letter from Baggett, McCall & Burgess to Barry Castleman RE Shell Documents-Bonsib Report

LAW OFFICES
BAGGETT, McCALL & BURGESS

A PROFESSIONAL LAW CORPORATION

3006 COUNTRY CLUB ROAD 70605

P.O. DRAWER 7820

LAKE CHARLES, LOUISIANA 70606-7820

(318) 478-8888

FAX (318) 478-8946

WILLIAM B. BAGGETT
ROBERT C. McCALL
ROGER G. BURGESS

WILLIAM BAGGETT, JR.
REBECCA S. YOUNG
ROBERT C. ARLEDGE

July 30, 1991

Dr. Barry Castleman
1722 Linden Avenue
Baltimore, Maryland 21217

RE: Shell Documents/ Bonsib Report

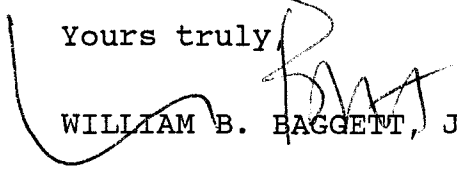
Dear Dr. Castleman:

Paul Henderson introduced us about a month ago while you were Beaumont testifying in one of his asbestos cases. You expressed an interest in some documents I told you about that Hershel Hobson recently obtained from Shell in some of our benzene cases. I believe we also talked about the 1948 API Toxicological review on Benzene. I have enclosed copies of these as well as a few similar documents you may be interested in seeing.

I have also enclosed a copy of "Dust Producing Operations in the Production of Petroleum Products and Associated Activities." We have argued that what Standard Oil did to protect its employees is relevant to show what our clients' employers could reasonably have learned and done about asbestos as early as 1937. Of course, since employers are usually immune from tort liability, this document may not be helpful to plaintiffs in states other than Louisiana. In fact, evidence of employer knowledge could potentially be damaging to a plaintiff's product liability claim.

Once you have a chance to review these materials, I'd really appreciate hearing what you think about them.

Yours truly,


WILLIAM B. BAGGETT, JR.

WBBjr/ct
Encls.