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COMMERCE TITLE BUILDING
PHONES 8-0557-8-0558
MEMPHIS, TENN.

October 11, 1937

Dr. Robert E. Kehoe, M. D.
University of Cincinnati
College of Medicine

Dear Doctor Kehoe:

This will acknowledge your letter of October 5, and I appreciate very much your sincere explanation of the difficulties that there would be in your arriving at a conclusion as to whether the specific case in question might furnish sufficient amount of information to you to determine the possibilities in regard to lead exposure.

I wonder if it might be possible that an explanation of the information desired in this matter might not have been made clear to you.

The principal point that we are trying to bring out in applying for expert testimony in this trial, is merely this:

The show the usual and necessary requirements made in various states, or in various plants, as a matter of personal precaution to protect the health and wellbeing of the employees, in order to avoid the possibility of said employees contracting said lead disease by such exposure.

By comparison the usual and necessary precautions taken, this can be compared to the present conditions under which the specific case we are trying would be made, so as to attempt to show whether or not there was any negligence on the part of the employer, in not employing the proper means of prevention to avoid the said disease.

I wonder if you would have any objections to my forwarding you a set of these questions for your personal examination, and you could possibly then determine whether or not you would conscientiously be in position to answer such general questions.

Trusting that you will advise, am

ALRJm

Very truly yours,
