

March 5, 1934

Dr. Graham Edgar
Ethyl Gasoline Corporation
Chrysler Building
New York City
New York

Dear Dr. Edgar:

I have gone over the letter and the petition relating to the alleged injury of one Mr. [REDACTED] employee of the Shell Petroleum Company.

We do not have any record that such an employee was employed in blending Ethyl Fluid with gasoline. Naturally I have no way of knowing the facts concerning him, but it is quite clear that he was not one of the regular mixing personnel.

It would appear that neither the plaintiff nor his attorney has any very definite idea as to just what materials produced the alleged injury. One has no way of determining, therefore, what type of injury would be stressed. Under the circumstances I should consider it advisable for you to reply to Mr. Taylor, pointing out that on the basis of my information Mr. [REDACTED] was not a regular blender but expressing willingness to give whatever assistance is required in providing facts as to the possibilities of exposure in the handling of Ethyl Gasoline. As you know I have avoided, as far as possible, appearing as expert witness in cases of this type. However, I should be glad to give any assistance or information which they may request from me. I do not feel that it is entirely necessary for me to keep out of such cases, but I think it wise to steer clear of them if it is possible to do so without leaving the defendant in the lurch.

Very truly yours,

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Robert A. Kehoe, M.D.