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HARRISON

HARRISON RADIATOR DIVISION

GENERAL MOTORS CORPORATION

LOCKPORT NEW YORK

November 18, 1938

Dr. Robert A. Kehoe,
College of Medicine,
University of Cincinnati,
Cincinnati, Ohio.

Dear Dr. Kehoe:

Thank you for your letter of November 16th returning the proposed examination with your comments thereon. Of course, before we go into the trial, we shall have to have some time to sit down and talk the matter over.

I note your criticism of the proposed hypothetical question which has to do with the air analyses made in the plant and the quantity of lead which such analysis showed. This question was prepared by me upon the testimony which I know will be introduced. The analyses were made by our own chemist and it would be unwise for us to question them. Insofar as the record will disclose the results of these analyses will be correct and there is no way for the claimant to dispute them. Therefore, we simply have to take the evidence as it is and formulate our question based upon that evidence.

I intend to make some motions upon technical grounds at the opening of the case when it is placed on the calendar. If I should be successful we shall avoid the trouble of going through the trial. I would not be surprised if the case were on the calendar for November 30th. If it is not closed at that time I shall try and arrange to have it adjourned to January, so as to avoid any possibility of having to go on with it during the holidays.

Yours very truly,

W. H. Kearney

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Executive Secretary.
HARRISON RADIATOR DIVISION
GENERAL MOTORS CORPORATION.

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