

COPY

STANDARD OIL COMPANY OF NEW JERSEY
26 Broadway, New York

July 8, 1935.

Hubbard vs: Standard

Mr. E. W. Webb
Ethyl Gasoline Corporation
135 East 42nd Street
New York City

Dear Mr. Webb:-

I feel sure you will be glad to have the following further comment on the value of Dr. Kehoe's testimony in the [REDACTED] case. The comment is from one of our Bennettsville counsel who has been studying the Town's reaction to the trial. The comment is:

"All commentators with whom I have come in contact have stressed the point that Slim Mathews, if anyone, was responsible for the injury to the boy's eye. The intervening cause was a simple, direct explanation which practically all people understood. Some of the more intelligent listeners have commented upon the fact that this was the first contention that lead poisoning could be caused by an eye injury of this sort; but even these commentators seem to have adopted that view largely because of the personality of Dr. Kehoe rather than because of their understanding of the technical facts. In my opinion, Dr. Kehoe's presence was of inestimable value so far as favorable publicity was concerned. In a moment I shall comment upon the effects on the jurors. To the people in the Court room, Dr. Kehoe seems to have been the personification of a very technical science, and though they could not understand the science they could at any rate see the man".

So that you may have a better understanding of the problems South Carolina litigation presents to us, let me add the following observation made a few days after the trial by one member of the jury who apparently favored a verdict for the plaintiff:

"That Esso - hit'll do things to you. I say anything that'll do things to a arn engine is bound to do somep'n to a man....and another thing, you know the Bible, you know what it says about the eyes. Hit says a man's eye is the most touchous thing they is."

Yours very truly,

Edwin S. Hall (signed)