

May 15, 1936

Mr. Otto M. Hamer
Suite 1503
60 West Washington Street
Chicago, Illinois

Dear Mr. Hamer:

Mr. Jordan of the Ethyl Gasoline Corporation has sent along to me your letter of May 12th concerning the case [REDACTED] vs. Packard Motor Car Company to which I hardly know how to reply.

I have a number of engagements for the latter part of this month and for the first of June which I trust will not make it impossible for me to testify in this case, but I should like to have notice as far in advance as possible of the date on which I may be required to be in Chicago.

I dare say that reasonably satisfactory consultation over the details of the matter can be had at the time of the trial of the suit. On the other hand, I had felt that it might be necessary and advisable to consider in some detail the manner of presenting the evidence so as to make sure that everything had been done to obtain all of the information that is required. It may be that you have all the information that you need. On the other hand it might well be that there would be some point in discussing the details of the case with the doctors who have examined the patient, and it might be well to make another examination of this man at present if such a thing is possible before the suit is actually brought to court. I should have thought that some consideration would have been given to the probable outcome of the case and the advisability or inadvisability of attempting to settle out of court. Not being in possession of all the information, I can not give a very intelligent opinion on the matter, but I am inclined to believe that the case will be a difficult one and that it should not be taken lightly. In this I may be mistaken, but if I were responsible I should hate to take a chance on getting together the medical information at the last minute.

I think it is perhaps worth while for you to realize that if I appear in this case, I shall not appear as a representative of the Ethyl Gasoline Corporation. I shall not conceal the fact, of course, that I have been a consultant of the latter Corporation since its origin. On the other hand my primary work is that of an investigator and teacher

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in the Medical School of the University of Cincinnati, and on account of the character of the work which we have been doing and the position which this laboratory occupies in this field of medicine, I shall, of course, appear in the case as a disinterested expert. I point this out merely to indicate that the connections of this laboratory with industry, including the Ethyl Gasoline Corporation, are from a professional point of view more or less incidental.

Very truly yours,

RAK:is

Robert A. Kehoe, M.D.

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