

no problem? needed

ETHYL GASOLINE CORPORATION

Sum. O. L.
25 BROADWAY

NEW YORK

March 5, 1930.

INTER-OFFICE
CORRESPONDENCE

Dr. R. A. Kehoe,
College of Medicine,
Eden & Bethesda Aves.,
Cincinnati, Ohio.

Dear Dr. Kehoe:

Enclosed is copy of letter from
Mr. Stryker to Mr. Johnson of the 1st which was
sent to us by the latter with the request that
we ascertain your views concerning the question
of Mr. Stryker.

Will you kindly let us have this
information at your earliest opportunity.

Yours very truly,

W. W. W. H.

A:H

KE 0017451

c o p y

LINDABURY, DEWEE & FAULKES
Prudential Building
763 Broad Street, Newark, N. J.

March 1, 1930

Re: ██████████ VS. STANDARD OIL CO.

Edward F. Johnson, Esq.
Standard Oil Company
26 Broadway
New York, N. Y.

Dear Mr. Johnson:

I have your letter of the 27th ult., enclosing copy of letter from Dr. Kehoe.

As I understand Dr. Kehoe's letter, it is based upon ██████████ condition in 1926, which he says was a year after the alleged exposure. Suit in this case was commenced on October 15, 1929, and, in my judgment, any claim for exposure prior to 1926, which resulted in an illness in 1926 would be barred by the Statute of Limitations. Evans will undoubtedly claim, however, that he was exposed to tetraethyl lead within a period of two years prior to the commencement of the action and it may be that he will also claim that the later exposure was more harmful to him because of his previous exposure than it otherwise would have been. I would like to have Dr. Kehoe's view as to whether any such claim could be sustained if made.

While, of course, I shall reserve decision as to the defenses which should be interposed to the suit until after the Bill of Particulars has been received, it is my present view that we should plead all of the defenses pleaded to the other suits and that it is quite possible that the Statute of Limitations may play a very important part in the litigation.

I do not know why the Bill of Particulars has been so long delayed unless, perhaps, Mr. Gordon is having some difficulty in stating his case so as to avoid the defense of the Statute of Limitations.

Very truly yours,

(Signed) Josiah Stryker

JS:EAS

February 12, 1930

Mr. E. W. Webb,
Ethyl Gasoline Corp.,
35 Broadway,
New York City.

Dear Mr. Webb:

In my conversation with Mr. Johnson of the Standard Oil department last Tuesday I outlined briefly what appeared to me to be the important facts in this and in similar cases, attempting to make clear from the point of view of medical expert what it would be necessary to demonstrate in order to bring such a case to a satisfactory conclusion. Mr. Johnson asked me to expand the subject somewhat in a letter to you, which might be transmitted to him at your pleasure.

I have followed Mr. Johnson's request and am enclosing herewith what seems to me to be a fair analysis of this case on a medical point of view. There may be certain facts and details involved on which there is not absolute unanimity of medical opinion. In general, however, the outline of the subject is accurate and all of the factual details are tenable. At least it represents the sort of evidence that I would consider it necessary to present in a case of this sort.

I am enclosing a copy for Mr. Johnson if you wish to place it in his hands.

I am certainly grateful for your telegram of last Friday informing me that it was unnecessary for me to go to Boston. I am sorry indeed if I gave you the impression that I was not entirely willing to go to Boston if necessary, for I should not wish you to feel that you need hesitate in asking my services in such a matter. However, I was very happy that it was not necessary for me to go at that time, for you can probably understand that there are many things here that need looking after.

It was a great pleasure to see you in New York and to have an opportunity of talking over somewhat fully a number of important matters. Kindest regards.

Sincerely yours,