

STANDARD OIL COMPANY OF NEW JERSEY

26 BROADWAY, NEW YORK

EDWIN S. HALL
FRANK S. PERRY
GEORGE H. TOWER
WILLIAM L. STEPHENS
COUNSEL

April 14 1936

vs: Standard

Doctor Robert A. Kehoe
College of Medicine
Eden and Bethesda Avenue
Cincinnati, Ohio

Dear Doctor Kehoe:-

Mr. Christie Benet, our South Carolina counsel, has constantly before him the possibility this case will be tried again next June. He is disturbed over the testimony given at the last trial by Dr. G.F. Lipscomb and Professor J. L. Moore and writes me the following comments:

"At the trial last June we were somewhat concerned about the testimony of Dr. G. F. Lipscomb and his assistant, Professor J. L. Moore, both on the Chemical staff at the University of South Carolina. You may remember that Dr. Lipscomb testified for the plaintiffs in the old Williams and Derrick explosion cases. In the [redacted] case there was no question but that the plaintiff's attorneys intended to rely strongly upon Lipscomb's testimony and we had reason to believe that they were somewhat disappointed at the way his testimony turned out. You will note from the reading of the transcript of his testimony and particularly my objections and cross-examinations, we were nervous about Lipscomb and blocked him every way we could and he was not as positive in his statements as his assistant, Professor Moore, a young and fairly keen person.

"Moore was on the stand a while before the noon recess and unquestionably Lipscomb and the plaintiff's attorneys worked on him pretty strongly before he went back on the stand after the court reconvened, as his testimony was much more positive and there was little doubt in our mind that he was doing all he could to blow a hole in the defendant's case."

Mr. Benet has asked if we will have the Lipscomb and Moore testimony reviewed by any available experts and give him the benefit of the best method to pursue in cross-examining them if they offer similar testimony at the next trial. It seems to me that since the testimony in question is more medical than chemical, you are in the best position to comment on it. Consequently, I am taking the liberty of sending you by express the transcript of the record and asking if you will review the testimony of these witnesses and give Mr. Benet and me the benefit of any comments you can offer.

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I doubt if there is any real need for you to review any other part of the record, although your very welcome interest in the case may lead you to read other parts of the testimony. If you care to offer comments on the testimony of any other witness, they will be most welcome. May I ask you to return the copy of the record when you are ready to send us your comments?

You very truly,

Edwin S. Hall

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c.c. Mr. Christie Benet