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HUMBLE OIL & REFINING COMPANY

LEGAL DEPARTMENT

HOUSTON, TEXAS,

May 10, 1932.

PLEASE ADDRESS YOUR REPLY TO
POST-OFFICE DRAWER "D" HOUSTON, TEXAS

Dr. Robert A. Kehoe,
University of Cincinnatti,
General Hospital,
Cincinnati, Ohio.

Dear Doctor:

I have received your letter of May 7th which outlines the testimony you are prepared to give and which in my opinion will be very beneficial.

The plaintiffs' attorneys have approached me several times for a settlement in the case and although I feel sure that there is no legal liability in this case, there is always danger where there is sufficient evidence to take the case to a jury. Before considering any proposition of settlement, however, I deem it necessary in looking after the interest of my client to ascertain the probable cost of trial and in this connection it becomes necessary to know approximately what it will cost our Company to have you come from Cincinnati and testify in addition to your expenses.

I talked to Dr. Aves with our Company and he stated that it might be that the Ethyl Gasoline Corporation would feel sufficiently interested to donate your time and perhaps the time of Dr. Schradin in the defense of this case, as a favorable outcome might be of benefit to the Ethyl Gasoline Corporation.

The plaintiffs have come down considerably on their offer of settlement although I have never intimated to them that I would pay any more than it would cost to try the case under ordinary circumstances.

In view of the importance of the litigation and the probable influence on subsequent claims, I am wondering if it would not also be advisable in the event we try this case to have Dr. Schradin present to testify if possible, and especially in view of the fact that he saw [redacted] before he died and also talked to his physician including Dr. Tucker of Lufkin, who I am advised by the plaintiffs will be here to testify in the case. Will you please advise me as soon as possible the attitude of your company with reference to your and Dr. Schradin's coming to testify and especially so far as your testimony is concerned, as it is necessary for me to know this in consideration of any further offer of settlement which the plaintiffs' attorneys may make.

KE 0010921

If the Ethyl Corporation should feel disposed to pay for your fee and time for you and Dr. Schradin, the Petroleum Casualty Company would be willing to pay the expenses for both you and Dr. Schradin in order to have testimony of both of you instead of just one.

I shall appreciate it if you will advise me at your earliest opportunity on this matter.

Very truly yours,

K.W. Gilmore

K.W. GILMORE.

KWG:OD