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November 23, 1938

Dr. Robert A. Kehoe
College of Medicine
Eden Avenue
Cincinnati, Ohio

Dear Sir:

Re: [REDACTED] v. Standard Oil
Company of New Jersey, et als.

The above styled action is a suit for damages against Standard Oil Company of New Jersey and S. J. Jasper now pending in the Circuit Court of Fayette County, West Virginia. This firm represents the Standard Oil Company of New Jersey. Plaintiff alleges that he contracted lead poisoning while in the employ of S. J. Jasper, the owner of a service station, at which station the products of Standard Oil Company are handled. He charges that Standard Oil Company of New Jersey was at fault in not warning him of the hazard connected with the handling of gasoline. We enclose a copy of the declaration.

Mr. Scholl of the legal department of the company in New York advises that he has made or will endeavor to make arrangements with you to assist us in defense of this case. That information from Mr. Scholl was the basis of our telephone call to you this morning.

We will be governed very largely by your judgment as to whether you should actually examine this man, or supervise the examination, or whether it would be better for you to analyze the findings of some other physician who would make the examination. We would say, however, that a physician who has actually seen the complainant is usually in a better position to impress the jury with his knowledge of the case. We probably could make arrangements to have the examination made at the Coal Valley Hospital in Montgomery, which is, as we understand it, a first class institution, and convenient to all parties interested in this case.

We are enclosing copy of a letter from our associate counsel in Fayetteville, West Virginia, covering various phases of this case. After reading this letter you may wish further detailed information as to certain matters referred to therein. We will endeavor to obtain whatever information the hospitals in this state can furnish.

Dr. Robert A. Kehoe
Page #2

In the event the Mayo Clinic is unwilling to furnish you with the information in their files, we will undertake to secure an authorization to that end from [REDACTED]. Our impression is that the doctors at the Mayo Clinic did not consider the lead poisoning of his case very serious. Please do not hesitate to call us by telephone with respect to any phase of this case. It probably will be tried in the latter part of January, and we have a great deal of preparatory work to do in the interval.

If we decide to have a physical examination of the plaintiff we should ask for it within the next two or three weeks. We would endeavor to fix the time to suit your convenience.

Very truly yours,

RUMMEL, BLAGG & STONE



A. G. Stone

AGS:ept