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SAVANNAH, GEORGIA

CABLE ADDRESS
ABALAW

April 25th, 1939

Dr. Robt. A. Kehoe,
University of Cincinnati,
College of Medicine,
Cincinnati, Ohio.

RE: [REDACTED] V. A. & M. WRECKING CO.
CITY COURT OF SAVANNAH

Dear Doctor Kehoe:

With further reference to yours of April 10th.

We have consulted the Court and opposing counsel about a date for the trial of this case and have tentatively agreed on May 29th, provided this date will be agreeable with you.

The 29th is Monday and the Court will start in on a fresh calendar on that date, so as to give this case the right-of-way.

In your letter to us of April 10th you mention the fact that an analysis had been made of the urine and blood of plaintiff [REDACTED] under your direction in July, 1937, for Dr. J. K. Train of Savannah. Dr. Train has been kind enough to furnish us his file. On July 9th, you wrote Dr. Train in part as follows:

"The blood sample showed 0.035 milligrams per 100 grams of blood, and the urine sample showed 0.01 milligrams per liter. With these results at hand, I think it is quite justifiable to conclude that this patient has not absorbed any considerable quantity of lead within the past several months."

Will you please advise us if this analysis would have proper bearing on the case, although it appears that Norton left his work with the company where he claims to have received the lead poisoning, on May 20th, 1936, which was more than a year before the analysis was made.

If [REDACTED] had suffered lead poisoning during a period of time prior to May 20, 1936, would an analysis made in July 1937 show a larger quantity of lead in the blood and urine than was found in Norton's specimens?

If the analysis, although taken more than a year after the man claims to have been poisoned is good evidence to show there is no lead poisoning, we want to be sure to get this in evidence for the trial of the case. If you can testify to the

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Dr. Robt. A. Kehoe

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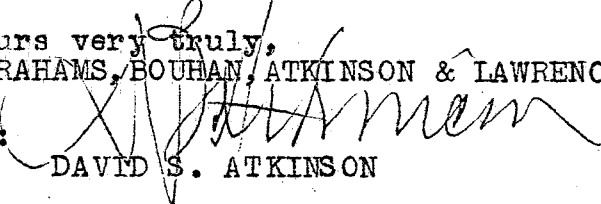
analysis from your own knowledge, that will be sufficient.

If not, we would like to have the depositions of the person who made the analysis taken by interrogatory, and filed in Court prior to the trial date.

We would like to ask you to consider these questions and if you think the analysis would be material, and the analysis was made by one of your assistants, then let us know the name of the person who made the analysis, and also give us the name of a Court Reporter or Notary Public, who may take the interrogatories of the witness so we can give proper notice and have these interrogatories taken and returned to the Court.

Thanking you for your kind consideration, we are

Yours very truly,
ABRAHAMS, BOUHAN, ATKINSON & LAWRENCE

BY: 
DAVID S. ATKINSON

DSA:epc

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