

ABE L. ROBERTS
ATTORNEY AT LAW
COMMERCE TITLE BUILDING
PHONES 8-0557-8-0558
MEMPHIS, TENN.

September 28, 1937

Dr. Kehoe
% College of Medicine
University of Cincinnati
Cincinnati, Ohio

Dear Doctor :

We wrote you some time ago, but you were away, and so we have not heard directly from you with regard to the matter in which we are interested, that is the working conditions creating lead poisoning, in plants of the type where the manufacture and mixing of paints is done.

As you perhaps may be aware, Tennessee does not have any specific law protecting employees on Occupational Diseases, neither does it have any particular statutes protecting employees relative to plant or industrial conditions connected with lead or paint manufacture.

We have a particular case in which we represent a plaintiff, wherein it is necessary to have a series of depositions answered by an expert, such as yourself, to know the usual and necessary precautions in plants which manufacture paint or use products of lead, so as to show the required safety standards which would have to be had in the ordinary uses of operation of said business, to protect the lives and the health of employees.

As such experts are not present in this part of the country, or known in or about Memphis, and as we have been referred to you, we would highly appreciate it, if it is possible that you could arrange to answer a series of such depositions in the presence of a Notary Public, and we assure you that this would take a relatively short space of time in said matter.

0002255

-2-Dr. Kehoe

No doubt, you realize the importance of this particular case, since it would mean, that is if we can impress the Court and general public of the necessity of improving same, with reference to poisonous or hazardous diseases, that this would eventually culminate in the passage of proper legislation for protection of the general public, and employees as well.

Looking forward to your reply and your cooperation, as this matter comes up in a very short time, I am

Very truly yours


ABE L. ROBERTS

ALR:mj