

ALL COMMUNICATIONS TO BE ADDRESSED
TO THE COMPANY AND NOT TO INDIVIDUALS

QUOTATIONS SUBJECT TO CHANGE
WITHOUT NOTICE

CABLE ADDRESS
SHELLPETCO ST. LOUIS



SHELL PETROLEUM CORPORATION

SHELL BUILDING

St. Louis, Mo.

MAYO BUILDING
TULSA, OKLAHOMA

April 20, 1934

Dr. Robert A. Kehoe
College of Medicine
Eden and Bathesda Avenues
Cincinnati, Ohio

IN RE: [REDACTED] v. SHELL
PETROLEUM CORPORATION,
ET AL.

Dear Dr. Kehoe:

We are in receipt of a letter from Mr. Benjamin C. Loder, counsel for Ethyl Gasoline Corporation, advising us that you would assist us in preparing the medical features of the above case.

This suit was filed by the plaintiff against Shell Petroleum Corporation and two foremen who are employed by Shell for the collection of \$25,000 in damages allegedly suffered by plaintiff by reason of his continuous contact over a period of time with various gases and other substances used in our refinery at Arkansas City, Kansas.

According to this plaintiff's petition, his present disability was caused by breaching and coming into personal contact with Ethyl lead, litharge, sulphur and other highly poisonous and dangerous elements and substances used in and around our refinery. It is plaintiff's contention that we failed to warn him of the dangerous characteristics of these various substances and failed to furnish him with proper equipment while working in and around the refinery. Plaintiff further contends that

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these various fumes and poisons, when breathed and absorbed into his body, poisoned his blood stream and entire system, both mental, nervous and physical, and caused him to lose his appetite and ambition and to lose twenty pounds in weight, and further caused him to become exceedingly nervous, restless and sleepless at night; poisoned, injured and affected his nervous system and mind; caused numbness in his limbs; caused him to lose strength and his complexion to become sallow, pale and without color; his digestive organs to not properly function; caused him to be afflicted with neuritis and to have spells of dizziness and vomiting; that his throat and lungs have become sore and painful; that he is weary and exhausted, coughs, has a constant headache, pains in his chest and stomach, is afflicted with nausea, drowsiness and dizziness; and that he suffers intense pain and misery from said afflicted parts.

As you will see, this petition is quite all-inclusive, and it is rather difficult to determine from the petition exactly what plaintiff's contention will be. However, plaintiff's attorneys have agreed to an examination of plaintiff by our doctors, providing we will give them a copy of such doctors' reports.

We will appreciate very much your either sending us or advising us where we can secure literature relative to the effect of Ethyl lead, litharge, sulphur, sulphuric acid, caustic soda, and petroleum gases upon the human system and, if you know of any medical books treating with any one or more of these substances and their effect upon the human system, kindly advise us where we can purchase such books.

We should also like to know whether it would be possible and whether you deem it advisable for you to participate in an examination of this

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plaintiff. We would welcome an examination of this plaintiff by you if it can be arranged, and in any event we would appreciate any suggestions which you might make relative to the nature and type of examination we should give this claimant.

Thanking you for any assistance which you may give us in this case and any suggestions which you might make, we are

Yours very truly,

SHELL PETROLEUM CORPORATION

Legal Dept.

By Geo. W. Cunningham
Geo. W. Cunningham, Jr.

GWC:MW

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