

March 5, 1934

Dr. Graham Edgar
Ethyl Gasoline Corporation
Chrysler Building
New York City
New York

Dear Dr. Edgar:

I have gone over the letter and [REDACTED]
relating to the alleged injury of one Mr.
employee of the Shell Petroleum Company.

We do not have any record that such an employee
was employed in blending Ethyl Fluid with gasoline.
Naturally I have no way of knowing the facts concerning
him, but it is quite clear that he was not one of the
regular mixing personnel.

It would appear that neither the plaintiff
nor his attorney has any very definite idea as to just
what materials produced the alleged injury. One has no
way of determining, therefore, what type of injury would
be stressed. Under the circumstances I should consider
it advisable for you to reply to Mr. Taylor, pointing out
that on the basis of my information Mr. [REDACTED] was not a
regular blender but expressing willingness to give what-
ever assistance is required in providing facts as to the
possibilities of exposure in the handling of Ethyl Gasoline.
As you know I have avoided, as far as possible, appearing
as expert witness in cases of this type. However, I should
be glad to give any assistance or information which they
may request from me. I do not feel that it is entirely
necessary for me to keep out of such cases, but I think
it wise to steer clear of them if it is possible to do so
without leaving the defendant in the lurch.

Very truly yours,

RAK:IS

Robert A. Kehoe, M.D.