

STANDARD OIL COMPANY OF NEW JERSEY

26 BROADWAY, NEW YORK

EDWIN S. HALL
FRANK S. PERRY
GEORGE H. TOWER
WILLIAM L. STEPHENS
COUNSEL

May 9 1935.

Hubbard vs: Standard

Mr. E. T. Webb
Ethyl Gasoline Corporation
135 East 42nd Street
New York City

Dear Mr. Webb:-

My file tells me Mr. Dodge kept you closely informed concerning this case while the early plans for our defense were being developed. It is probable the case will be tried at the term of court commencing June 24. It may be the first case reached for trial. Mr. Herbert, associated with the defense, recently met Mr. Tison, one of plaintiff's counsel, and during a general conversation this case was mentioned. The question of possible settlement came up and Mr. Herbert asked Mr. Tison if they cared to submit any figures. Mr. Tison said they would not settle for much less than \$25,000. and Mr. Herbert told him that was out of the question, that the top figure he would be even willing to consider would be \$12,000. to \$15,000. Mr. Tison said he thought that was entirely too low but he would talk to [REDACTED] and Mr. Edens, his associate in the case. He saw Mr. Herbert again last week and said they were loathe to go below \$25,000. but would probably consider an amount from \$20,000. to \$25,000. This is the first time the question of settlement has been discussed. It was Mr. Herbert's reaction that the case could be settled for \$18,000.

Our experience with South Carolina litigation makes me fear that if we settle this case for any substantial amount, we will be confronted with more cases of this type. They are extremely difficult cases to defend. I am inclined to believe we have got to take our chances with making a successful defense. I think we should refrain from settling the case, at least for any amount in excess of the cost of trial. Your future market may be affected by our decision. Therefore, I would like to know if you share my views.

Yours very truly,

Edwin S. Hall

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