

**FILED**  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS  
NOV 05 1997

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION

JAMES W McCORMACK, CLERK  
By: *[Signature]*  
DEP. CLERK

PAULA CORBIN JONES, :  
 :  
 Plaintiff, :  
 :  
 v. :  
 :  
 WILLIAM JEFFERSON CLINTON :  
 :  
 and :  
 :  
 DANNY FERGUSON, :  
 :  
 Defendants. :

CIVIL ACTION  
NO. LR-C-94-290

Judge Susan Webber Wright

(UNDER SEAL)

PRESIDENT CLINTON'S RESPONSE TO PLAINTIFF'S OPPOSITION  
TO L.D. BROWN'S MOTION TO QUASH SUBPOENA

President Clinton, through counsel, hereby submits this response to plaintiff's Opposition to L.D. Brown's Motion to Quash Subpoena.

As a threshold matter, plaintiff's Opposition overstates the Court's ruling with respect to the deposition of Mr. Brown. We understood that the Court's order permitting Mr. Brown's deposition, and certain other third party depositions, to proceed was based, in part, on the fact that the third parties themselves had not moved to quash or for a protective order. The Court made its ruling solely on the general relevance objections of counsel and did not have before it the specific information presented by Mr. Brown.

Furthermore, plaintiff should not be surprised that third parties such as Mr. Brown will seek the advice of counsel

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and protection from this Court from the far-reaching and abusive discovery initiated by plaintiff.<sup>1</sup> Moreover, it is clear from plaintiff's Opposition that this discovery, like most of plaintiff's other discovery, is focussed on attempts to harass and embarrass the President of the United States, and is not reasonably calculated to lead to the discovery of admissible evidence. Indeed, Mr. Brown's statements in his motion to quash support his claim that he has no relevant information. See, e.g., Motion to Quash at 2 ("L.D. Brown has no knowledge, in his capacity in the Arkansas State Police Gubernatorial Security Detail, either before or after June, 1985, of any sexual encounters with any women which formed the basis of either a promotion, demotion or appointment for state employment.")

Instead, plaintiff, whose lawsuit is being financed by the Rutherford Institute, has initiated discovery to further a political agenda designed to hurt the President. This is evidenced in part by the fact that plaintiff seeks broad-based discovery from Mr. Brown based on information contained in an article published in the American Spectator. Plaintiff's Opposition at 1-4 & Exhibit 1.

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<sup>1</sup> To the extent plaintiff's opposition suggested that counsel for the President were involved in Mr. Brown's "carefully drafted" motion (plaintiff's Opposition at 3), we wish to make clear that we played no role in the preparation of his motion to quash and first learned of it and its contents when we received it via facsimile.

In any event, contrary to plaintiff's protestations, we believe it is appropriate for this Court to consider the merits of Mr. Brown's motion.

Respectfully submitted,

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Dated: Washington, D.C.  
November 5, 1997


CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 1997, a true and correct copy of President Clinton's Response To Plaintiff's Opposition to L.D. Brown's Motion to Quash Subpoena was served via facsimile and first class United States Mail postage prepaid to:

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