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

PAULA CORBIN JONES,

Plaintiff,

v.

WILLIAM JEFFERSON CLINTON

and

DANNY FERGUSON,

Defendants.

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**CIVIL ACTION  
NO. LR-C-94-290**

**Judge Susan Webber Wright**

**FEDERAL RULE OF CIVIL PROCEDURE 45(c) (2) (B) OBJECTIONS  
TO SUBPOENA DUCES TECUM DIRECTED TO STEPHEN JONES**

Pursuant to Fed. R. Civ. P. 45(c)(2)(B) Mr. Stephen Jones ("Jones") hereby objects to the Subpoena Duces Tecum Directed to Stephen Jones dated September 30, 1997 ("Subpoena"), which seeks "all documents . . . concerning or relating to Paula Corbin Jones," in accordance with the numbered paragraphs as set forth below.

**OBJECTIONS**

1. Deponent Stephen Jones would state that the wording of Schedule A which attempts to describe the documents which he has been commanded to produce is so general and broad that it can be interpreted to seek documents which would be privileged from discovery under the attorney/client privilege, privilege for trial preparation materials, attorney/client work product and/or party communications privilege. Although no such documents presently exist, Stephen Jones believes that the request is so overly broad and the wording contained therein is

so general that documents which may potentially be covered by said request may come into being between the present time and the time that such documents should be produced and thus Jones believes it is necessary to make the following Objections to such potential production.

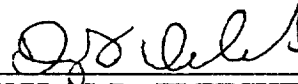
2. Deponent Stephen Jones would further Object to the instructions contained in Schedule A of the Subpoena Duces Tecum, specifically sub-part E. which attempts to make the document request constitute a "continuing request so as to require supplemental productions when appropriate" on the part of Deponent Jones. Such attempt to create a continuing duty to supplement production is improper and in violation of the Federal Rules of Civil Procedure and is not contained in Rules 26., 34. and 45. of the Federal Rules of Civil Procedure. This blatant attempt to improperly expand the scope of discovery constitutes an attempt to harass Deponent Jones and creates an unreasonable burden upon him.

3. Deponent Stephen Jones would further Object to the subpoena which seeks to require his presence for deposition at the offices of counsel for Defendant William Jefferson Clinton in Los Angeles, California on November 19, 1997, at 9:30 a.m. Although Deponent Stephen Jones resides in the Los Angeles County area he has retained legal counsel to represent him in the course of this litigation, said legal counsel being the law firm of Fletcher & Springer, L.L.P. which is located in Dallas, Texas. Mr. Jones is aware that numerous other depositions have been scheduled for the same period of time in November of 1997 in the Dallas County area and would request that the Court require his deposition to be taken at the law offices of his legal representative, the law firm of Fletcher & Springer, L.L.P. in Dallas, Texas.

Respectfully submitted,

**FLETCHER & SPRINGER, L.L.P.**

BY:



DOUGLAS D. FLETCHER

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[APPLICATION FOR ADMISSION PENDING]

**ATTORNEYS FOR STEPHEN JONES**

**CERTIFICATE OF SERVICE**

This is to certify that on the 21<sup>st</sup> day of Oct., 1997, a true and correct copy of the foregoing instrument has been mailed, telecopied or hand delivered, in compliance with the Federal Rules of Civil Procedure to the following:

Mr. Donovan Campbell, Jr.  
Rader, Campbell, Fisher & Pyke  
Stemmons Place, Suite 1080  
2777 Stemmons Freeway  
Dallas, Texas 75207

Mr. Mitchell S. Ettinger  
Skadden, Arps, Slate, Meagher  
& Flom, L.L.P.  
1440 New York Avenue, N.W.  
Washington, D.C. 20005

Mr. Bill W. Bristow, P.A.  
216 E. Washington  
Jonesboro, AR 72401

  
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DOUGLAS D. FLETCHER