

FILED

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

DEC 19 1997

PAULA CORBIN JONES,

Plaintiff,

vs.

WILLIAM JEFFERSON CLINTON
And DANNY FERGUSON,

Defendants.

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

C.A. No. LR-C-94-290

Judge Susan Webber Wright

FILED UNDER SEAL

MOTION TO QUASH OR MODIFY SUBPOENA
AND FOR A PROTECTIVE ORDER
PURSUANT TO RULE 26

TO THE HONORABLE FEDERAL DISTRICT JUDGE:

Amy Paul and Bruce W. Eberle & Associates, Inc., through counsel, move this Court pursuant to F.R.Civ.P. 26(c) to quash or modify a subpoena and for entry of the attached Protective Order, which is incorporated by reference herein, and in support state as follows:

Amy Paul, Eberle & Associates, was served a Subpoena In A Civil Case, dated December 2, 1997, issued under the signature of Robert S. Bennett, Attorney for Defendant, by the United States District Court for the District of Columbia ("Subpoena"), for Amy Paul, Eberle & Associates. Mr. Bennett is counsel for William Jefferson Clinton ("The President"). The Subpoena commands the production of all documents in her "custody, control, or possession or within the right of custody, control or possession of Amy Paul, Eberle & Associates" concerning:

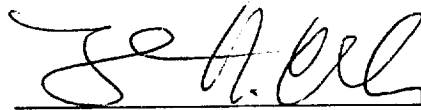
- "1. Paula Jones
2. The case captioned Jones v. Clinton, United States District Court, Eastern District of Arkansas, Western Division, Civil Action No. LR-C-94-290, and any and all appeals thereof
3. Susan Carpenter McMillan
4. Stephen Jones
5. Cindy Hays
6. Gilbert Davis
7. Joseph Cammarata
8. Any lawyer or other person affiliated with the law firm of Rader, Campbell, Fisher & Pyke
9. The Rutherford Institute or anyone affiliated with that organization
10. Margaret Birky"

The documents are to be produced at 10:00 a.m., December 22, 1997, at the office of counsel for The President and she is further commanded to appear at 10:00 a.m., January 23, 1998, for the taking of a deposition. (A true copy of the Subpoena is attached hereto as Exhibit "A" and incorporated herein by reference). An objection to production of documents was served upon Mr. Bennett on December 16, 1997.

This is an expansive demand for records. Bruce W. Eberle & Associates, Inc. joins in this request because some of the documents requested are its documents.

A memorandum in support of this Motion is submitted herewith.

Dated: December 18, 1997

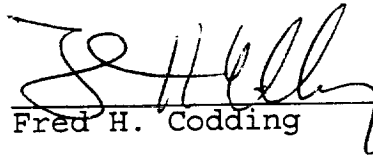


FRED H. CODDING, ESQUIRE
Counsel for Amy Paul and
Bruce W. Eberle & Associates, Inc.
10382 Main Street, Suite 200
Post Office Box 225
Fairfax, Virginia 22030
(703) 591-1870

CERTIFICATE OF COMPLIANCE

Fred H. Coddington, counsel for Amy Paul and Bruce W. Eberle & Associates, Inc., hereby certifies that he has conferred with counsel for William Jefferson Clinton in a good faith effort to resolve the issues raised by the foregoing Motion and that he and counsel for William Jefferson Clinton have been unable to resolve the dispute.

Dated: December 18, 1997



Fred H. Coddington

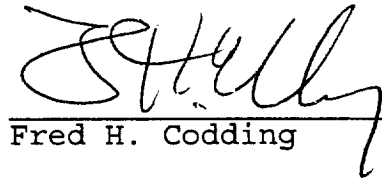
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION TO QUASH OR MODIFY SUBPOENA AND FOR A PROTECTIVE ORDER PURSUANT TO RULE 26 was mailed first class, posted prepaid, on this 18th day of December, 1997, to the following:

Robert S. Bennett, Esquire
Mitchell S. Ettinger, Esquire
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1440 New York Avenue, N.W.
Washington, D. C. 20005-2111

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Fred H. Coddington