

**FILED**

U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

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

DEC 19 1997

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

PAULA CORBIN JONES,

Plaintiff,

vs.

WILLIAM JEFFERSON CLINTON  
And DANNY FERGUSON,

Defendants.

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

Judge Susan Webber Wright

FILED UNDER SEAL

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AFFIDAVIT

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STATE OF VIRGINIA,  
COUNTY OF FAIRFAX, to-wit:

Amy Paul, being duly sworn, deposes and says:

I am an Account Executive with Bruce W. Eberle & Associates, Inc., and have been served with the attached Subpoena in the above action in which neither Bruce W. Eberle & Associates, Inc. nor I are parties. This Affidavit is made in support of a Motion to Quash Or Modify Subpoena and for a Protective Order.

1. On December 2, 1997, I was served with the Subpoena for the production of documents requiring me to appear and attend before Robert S. Bennett on the 22nd day of December, 1997, and to bring with me certain documents, to-wit: all documents in my possession 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

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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"

2. I do not have access to all corporate records of Bruce W. Eberle & Associates, Inc. A complete search of corporate records for all "Documents" as defined in Schedule A attached to the Subpoena would, however, require a massive search. It includes all information on computer hard drive or disks, video tapes and audio tapes. The time frame set forth in the Subpoena is May 8, 1991, to the present necessitates an extensive and prolonged examination.

3. It will be extremely inconvenient and very expensive to produce the documents.

4. The documents are irrelevant to the issues at trial.

5. The Subpoena does not sufficiently designate specific documents.

6. The documents I have include privileged communications with our counsel concerning the Paula Jones Legal Fund, as well as marketing and private commercial information of Bruce W. Eberle & Associates, Inc. and its clients.

  
\_\_\_\_\_  
Amy Paul

Subscribed and sworn to before me on December 18, 1997.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 8/31/98

SKADL LN, ARPS, SLATE, MEAGHER & FLOM LLP

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DIRECT DIAL  
(202) 371-7180

December 2, 1997

BY HAND DELIVERY

Amy Paul  
Eberle & Associates  
1420 Spring Hill Road, Suite 490  
McLean, Virginia 22102

Re: Jones v. Clinton

Dear Ms. Paul:

Enclosed is a subpoena for deposition and request for documents from you in connection with the above-referenced case. Also enclosed is a copy of the Confidentiality Order entered by the Court in this case. Please be advised that all of the information in this case, including all information in this subpoena, is UNDER SEAL and subject to the confidentiality order enclosed.

If you have any question, please give me a call.

Very truly yours,



Robert S. Bennett

Enclosures

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.

CIVIL ACTION  
NO. LR-C-94-290

Judge Susan Webber Wright

SCHEDULE A

President Clinton, through counsel, requests, pursuant to Rules 26, 34 and 45 of the Federal Rules of Civil Procedure, that Amy Paul, Eberle & Associates produce for inspection and copying at Skadden, Arps, Slate, Meagher & Flom LLP, 1440 New York Avenue, N.W., 11th Floor, Washington, D.C. 20005 at 10:00 a.m., on December 22, 1997, any and all of the following documents within the possession, custody, or control of Amy Paul, Eberle & Associates in accordance with the definitions and instructions set forth herein.

INSTRUCTIONS

- A. This document request covers the time period from May 8, 1991 to the present unless otherwise specified.
- B. All documents are to be produced that are in the custody, control, or possession or within the right of custody, control, or possession of Amy Paul, Eberle & Associates.

C. Objections to specific requests, if any, shall be signed by the attorney making them. If an objection is made to part of a document request, the part objected to shall be specified and the document(s) shall be otherwise produced. All objections are to be made and served on or before the time of production.

D. If a privilege is claimed as to any document(s) sought hereby and any such document(s) is not produced on the basis of such assertion, identify such document(s) (including the author, recipient, date, type and subject matter of the document) and the nature of the privilege invoked.

E. This document request shall constitute a continuing request so as to require supplemental productions when appropriate.

F. The following rules of construction shall apply:

i) The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all documents that might otherwise be construed to be outside of its scope.

ii) The use of the singular form of any word includes the plural and vice versa.

#### DEFINITIONS

A. "AIDC" refers to the Arkansas Industrial Development Commission, Paula Corbin Jones' alleged former employer.

B. "COMMUNICATION," and "COMMUNICATED" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

C. "COMPLAINT" means the complaint filed by Paula Corbin Jones on May 6, 1994 which initiated this litigation.

D. "CONCERNING" means relating to, regarding, referring to, describing, evidencing or constituting.

E. "DOCUMENT" is synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including but not limited to, all information on computer hard drive or disks, video tapes, and audio tapes. A draft or non-identical copy is a separate document within the meaning of this term.

F. "JONES" refers to Paula Corbin Jones, the plaintiff in the above-captioned case, Stephen Jones, and all persons or entities acting on Paula Corbin Jones' behalf (other than lawyers providing legal advice).

G. "POSSESSION" of documents means documents within your actual or constructive possession, custody or control or within your right of possession, custody or control.

H. "PRESIDENT CLINTON" refers to defendant William Jefferson Clinton.

#### DOCUMENTS REQUESTED

All DOCUMENTS in your POSSESSION 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

Dated: Washington, D.C.  
December 2, 1997

By: Robert S. Bennett  
Robert S. Bennett, Esq.  
Carl S. Rauh, Esq.  
Mitchell S. Ettinger, Esq.  
Amy Sabrin, Esq.  
Katharine S. Sexton, Esq.  
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& COULTER  
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Counsel to  
President William J. Clinton