



On December 9, 1997, Cindy Hays, the former director of Paula Jones' Legal Fund, was deposed. During that deposition, Ms. Hays testified that a psychologist named Mary "Missy" Estrich had been brought in as a consulting expert to the legal case, and that this psychologist also had been consulted by the Legal Fund.

Ms. Estrich's identity was not disclosed by plaintiff in response to Interrogatory No. 19, which asked her to identify, inter alia, "each and every . . . psychologist, counselor or other advisor (other than lawyers) whom YOU have engaged or consulted in connection with . . . this litigation." Nor was it provided in response to plaintiff's recently submitted answer to Interrogatory No. 21, which asked for any individuals or entities consulted by plaintiff in connection with the litigation. (See Mtn. To Compel, Ex. A). In addition, it became apparent during Ms. Hays' deposition that plaintiff, via the Legal Fund, had consulted a number of public relations and direct mail professionals, the names of which also would have been responsive to the above-referenced interrogatories.

It is obvious that plaintiff's counsel are playing a game and hiding behind their objections to the definitions in the Interrogatory instructions. Those instructions reasonably define "Jones, "You" and "Your" as Paula Jones,

Stephen Jones, and all persons and entities acting on Ms. Jones' behalf, other than lawyers. (Id. At 3). Moreover, plaintiff has represented in several other pleadings before this Court that she and the Paula Jones Legal Fund are one and the same. Thus, regardless of how one defines "you," plaintiff cannot be heard to object to disclosing this information because these consultants were consulted by the Fund. More troubling, this game-playing with definitions leads one to wonder how many other professionals, experts and the like have been consulted by plaintiff and her entourage which were not disclosed in response to these interrogatories.

Furthermore, plaintiff responded to President Clinton's Second Set of Interrogatories, expressly referencing experts, on December 22, 1997 -- answering only that she has not yet decided whether she will call any expert witnesses. The names of any expert witnesses should have been provided in response to Interrogatories 19 and 21, referenced above, which were served last July. These additional interrogatories were posed simply to prevent plaintiff from wriggling out of her obligations in this regard. Moreover, we made clear in our November 20<sup>th</sup> correspondence that we wanted this information in advance of the date witness lists were due. (Mtn. To Compel Answers to Interrogatories, Ex.

D). Plaintiff's outright refusal to provide such information in advance of the date that witness lists were exchanged should preclude her from objecting if we seek to amend our witness list to add experts to counter any experts she may attempt to identify in supplemental answers to our interrogatories.

In sum, President Clinton's Motion to Compel Answers to Interrogatories was necessary because plaintiff wholly failed to respond to our letter of November 20, 1997, seeking answers to two interrogatories, including one which plaintiff admittedly failed to answer. Moreover, we have since learned from deposition testimony and other materials discovered in this litigation that plaintiff and her legal team have consulted experts and professionals. Plaintiff should be required to amend her answers to these interroga-

tories to identify all experts and professionals which have been consulted in connection with this litigation.

Respectfully submitted,

By: 

Robert S. Bennett, Esq.  
Carl S. Rauh, Esq.  
Mitchell S. Ettinger, Esq.  
Amy Sabrin, Esq.  
Katharine S. Sexton, Esq.  
SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP  
1440 New York Avenue, N.W.  
Washington, D.C. 20005  
(202) 371-7000

Kathlyn Graves, Esq.  
WRIGHT, LINDSEY & JEFFINGS  
200 West Capitol Avenue  
Suite 2200  
Little Rock, Arkansas 72201  
(501) 371-0808

Stephen Engstrom, Esq.  
WILSON, ENGSTROM, CORUM, DUDLEY  
& COULTER  
809 West Third Street  
Little Rock, Arkansas 72202  
(501) - 375-6453

Counsel to  
President William J. Clinton

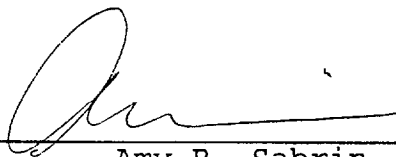
Dated: December 23, 1997.

CERTIFICATE OF SERVICE

I hereby certify that on the 23<sup>rd</sup> day of December, 1997, a true and correct copy of President Clinton's Reply to Plaintiff's Response to President Clinton's Motion to Compel Answers to Interrogatories was served via Federal Express on:

Bill W. Bristow, Esq.  
216 East Washington  
Jonesboro, Arkansas 72401

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



---

Amy R. Sabrin