



Jones Legal Fund. In addition, based on discovery in this case, we understand that Ms. Paul has met with and corresponded with plaintiff. Furthermore, the subpoena seeks information that clearly is relevant to the underlying action. For example, the subpoena seeks information concerning Paula Jones, her lawsuit, the Paula Jones Legal Fund, and the Rutherford Institute (the organization raising money to pay the legal fees and costs of plaintiff's lawsuit). Indeed, as the motion to quash acknowledges, the Court already has considered and rejected motions to quash subpoenas seeking similar discovery from Cindy Hays and the Paula Jones Legal Fund. Accordingly, prior to receiving this motion, or Ms. Paul's objections, we already had informed counsel for Ms. Paul that, to the extent the Court's prior Orders are applicable to this subpoena, it too is governed by those Orders. See Exhibit A hereto.

With respect to privilege issues, we requested, and Rule 26(b)(5) of the Federal Rules of Civil Procedure requires, that Ms. Paul provide a privilege log so that we may evaluate any assertions of privilege. The privilege log will enable us to try to resolve any such claims without the court's involvement.

We simply do not understand the basis for Ms. Paul's objection to the subpoena on the grounds that it would result in annoyance, oppression, undue burden and undue expense, and therefore, do not have a response. As this Court has observed on numerous occasions, responding to any subpoena causes some annoyance, burden and expense. Ms. Paul, however, has failed to point

to any particularly egregious annoyance or burden on her that would require relief from the Court. Similarly, Ms. Paul's objections to the definition of "document" are unavailing because the subpoena merely defined that term in accordance with Rule 34 of the Federal Rules of Civil Procedure. To the extent Ms. Paul claims that the time period is burdensome, we are available to discuss modifications.

In short, the motion to quash or modify should be denied.

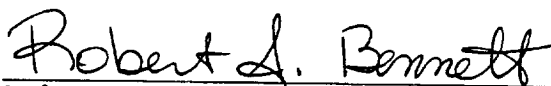
**II. REQUEST FOR SPECIAL PROTECTIVE ORDER FOR AMY PAUL, EBERLE & ASSOCIATES SHOULD BE DENIED.**

The request for an additional protective order in the case to govern discovery solely from Ms. Paul and Eberle & Associates also should be rejected. The motion fails to articulate any reason why the existing confidentiality order, a copy of which was served on Ms. Paul with the subpoena, does not sufficiently protect material responsive to this subpoena. Thus, Ms. Paul fails to substantiate her claim that the information sought from her and Eberle & Associates requires any special treatment beyond that which has been afforded to all discovery in the case, including discovery from the President of the United States. In these circumstances, there simply is no need for the Court to consider additional protections solely for Ms. Paul and Eberle & Associates.

CONCLUSION

For all of the foregoing reasons, the Motion to Quash and for an additional protective order should be denied.

Respectfully submitted,



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Attorneys for William Jefferson  
Clinton

Dated: Washington, D.C.  
December 30, 1997


CERTIFICATE OF SERVICE

I hereby certify that on this 30<sup>th</sup> day of December, 1997, a true and correct copy of the foregoing Response in Opposition to Motion to Quash or Modify Subpoena and for Protective Order of Amy Paul, Eberle & Associates was served by facsimile and United States mail, postage prepaid to:

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ALL OTHERS 11-341 100% RECYCLED

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December 12, 1997

VIA FACSIMILE

Fred Coddling, Esq.  
10382 Main Street  
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Re: Jones v. Clinton -- Subpoena to Amy  
Paul (UNDER SEAL)

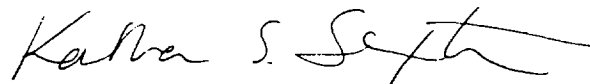
Dear Mr. Coddling:

I understand from our telephone conversation that you represent Amy Paul, Eberle & Associates in connection with the subpoena we served pursuant to the above-referenced matter.

This letter confirms that, to the extent the Court's Orders with respect to discovery concerning the Paula Jones Legal Fund and Cindy Hays are applicable to the above-referenced subpoena, i.e., that the names of individual donors only should remain confidential, the above-referenced subpoena is governed by those Orders, and I understand you already have obtained copies of those Orders.

Please feel free to call me if you have any questions.

Very truly yours,



Katharine S. Sexton