

JAN 13 1998

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

JAMES W. McCORMACK, CLERK
By: V. Swiney
DEP CLERK

PAULA CORBIN JONES

PLAINTIFF

v.

No. LR-C-94-290

WILLIAM JEFFERSON CLINTON and
DANNY FERGUSON

DEFENDANTS

UNDER SEAL

RESPONSE OF DANNY FERGUSON TO PLAINTIFF'S
MOTION TO COMPEL

Comes now Danny Ferguson and for his Response to Plaintiff's Motion to Compel Responses to Plaintiff's First Set of Interrogatories and First Request for Production of Documents and Things, states and alleges as follows, viz:

1. Danny Ferguson believes that he has fairly responded to plaintiff's first set of interrogatories by designating a witness list. However, since there has been substantial additional discovery, Danny Ferguson states that to his knowledge, the only persons who know what happened in the room is Paula Corbin Jones and William Jefferson Clinton. As regards persons, other than his present counsel, that Danny Ferguson talked with about the incident, he can only recall conversations with David Brock, Bill Wrimple, Sheila Ferguson, Ronnie Anderson, Larry Patterson, Roger Perry, and Buddy Young. Defendant Danny

Ferguson believes that his initial response and furnishing of the witness list was sufficient, but certainly the statements made herein should moot this issue.

2. Furthermore, defendant Ferguson states that he does not have documents responsive to the request for production of documents. Apparently, plaintiff's counsel cannot accept the fact that defendant Danny Ferguson and his attorney, Bill W. Bristow, have simply made an oral agreement that upon the conclusion of the litigation that they will agree on a reasonable fee. It is certainly within the province of defendant's counsel to charge as much of a fee, or as little fee, as counsel and client agree upon. There simply are no documents with regard to an attorney's fee contract nor have there been any invoices generated with regard to the payment of fees or expenses. Without waiving the argument that the matter of expenses incurred on behalf of Mr. Ferguson is privileged and not discoverable, counsel for Danny Ferguson attaches hereto as a responsive exhibit his personal handwritten notes as to expenses he has incurred. There are no other documents responsive to the request.

3. Finally, plaintiff states that defendants must have documents containing notes of any conversations about defendant Clinton and other women. Defendant Ferguson has indicated that he has never had such documents.

WHEREFORE, premises considered, defendant Danny Ferguson prays that the Motion to Compel be denied and for all other further and proper relief in the premises.

DANNY FERGUSON

By Bill W. Bristow
Bill W. Bristow, P. A.
State Bar No. 75009
216 E. Washington
Jonesboro, Arkansas 72401

CERTIFICATE OF SERVICE

I, Bill W. Bristow, attorney for defendant, Ferguson certify that I have served a copy of the foregoing response on other attorneys of record, Mr. McCord Wilson, Stemmons Place, Suite 1080, 2777 Stemmons Freeway, Dallas, Texas 75207, Mr. Robert Bennett, 1440 New York Avenue, N.W., Washington, D.C. 20005-2111, Kathlyn Graves, 200 West Capitol Avenue, Suite 2200, Little Rock, Arkansas 72201, and Mr. Stephen Engstrom 809 West Third Street, Little Rock, Arkansas 72202, this 12th day of January, 1998.

Bill W. Bristow
Bill W. Bristow, P. A.

Larry Ferguson Expenses:

9-25-97	Dennis Kirkland Subpoena	65.00
	Rusty Garner Subpoena	40.00
	Mark Eubanks Subpoena	86.50
	L' Donna Mauer Subpoena	49.50
	Brian Hunt Subpoena	55.50
	Jon Janssen Subpoena	86.50
	Jerry Adam Subpoena	65.00
	David Young Subpoena	62.00
9-26-97	Certified Mail	3.00
10-7-97	Judicial Courier Services (Brian Hunt Services)	50.00
10-9-97	Federal Express	10.50
10-13-97	Judicial Courier Services (L' Donna Mauer Services)	40.00
10-16-97	Fayetteville Lodging (Windsor Inn)	105.89
11-17-97	Rita Pass (Brian Hunt + L' Donna Mauer Deposition)	583.50
11-10-97	Doubletree	102.91
11-12-97	Doubletree	120.57
11-13-97	Sheraton - Dallas	184.03
11-13-97	Dallas Air Tax	180.00
11-14-97	Doubletree	113.21
11-24-97	Vicky Hedgecock (Mark Eubanks Deposition)	109.00
1-7-98	Sheraton - Dallas	213.03

LAW OFFICES OF
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January 9, 1998

UNDER SEAL

James W. McCormack, Clerk
United States District Court
Eastern District of Arkansas
600 West Capitol Avenue, Suite 302
Little Rock, Arkansas 72201-3325

VIA U.S. MAIL

Re: *Jones v. Clinton, et al.*; 94-CV-290, U. S. District Court for the Eastern District of Arkansas; Plaintiff's Response to Motion of Jane Doe #5 to Quash Deposition Subpoena

Dear Mr. McCormack:

Enclosed are an original and three copies of the referenced Plaintiff's Response to Motion of Jane Doe #5 to Quash Deposition Subpoena which was faxed to the Court yesterday. Please file under seal the original with the records of this case and return a file-stamped copy to me in the enclosed envelope.

By copy of this letter all counsel of record are being furnished their service copies of this motion.

Thank you for your assistance.

Sincerely yours,

James A. Fisher

stn/enclosures

cc: Robert S. Bennett, Esq. (w/encl.)
Kathlyn Graves, Esq. (w/encl.)
Stephen Engstrom, Esq. (w/encl.)
Bill W. Bristow, Esq. (w/encl.)

VIA U.S. MAIL
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BILL W. BRISTOW, P.A.

ATTORNEY AT LAW
216 EAST WASHINGTON
JONESBORO, AR 72401

1/13
SW

TEL. (870) 935-9000

January 12, 1998

FAX (870) 931-4814

UNDER SEAL

Mr. James W. McCormack
United States District Court Clerk
600 West Capitol Avenue, Suite 302
Little Rock, Arkansas 72201-3325

Re: Jones v. Clinton, et al, No. LR-C-94-290

Dear Mr. McCormack:

Enclosed is an original and three copies of defendant Danny Ferguson's Response to Motion to Compel. Please file under seal the original of this document with the records of this case and return a file-marked copy to me in the enclosed envelope.

I am furnishing service copies of this response to opposing counsel by overnight delivery.

With best regards, I am

Sincerely yours,


Bill W. Bristow, P.A.

BWB/jh

cc: Mr. McCord Wilson
Attorney at Law
Stemmons Place, Suite 1080
Stemmons Freeway
Dallas, Texas 75207

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