

JAN 16 1998

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

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

PAULA JONES,

Plaintiff,

v.

WILLIAM JEFFERSON CLINTON
and DANNY FERGUSON,

Defendants.

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CIVIL ACTION NO. LR-C-94-290

Judge Susan Webber Wright

Under Seal

**PLAINTIFF'S MOTION TO COMPEL RESPONSES TO PLAINTIFF'S
SECOND SET OF INTERROGATORIES AND TO STRIKE DEFENDANT
CLINTON'S SUPPLEMENTAL RESPONSES THERETO**

Plaintiff Paula Jones hereby moves for an order compelling Defendant Clinton to answer Interrogatories No. 10 and 11 in the Second Set of Interrogatories from Plaintiff to Defendant Clinton without improper and unauthorized conditions or limitations to the interrogatories or the answers or for an order striking the improper conditions and limitations from Defendant Clinton's Supplemental Responses to Plaintiff's Second Set of Interrogatories.

1. On October 1, 1997, Plaintiff served on Defendant Clinton her "Second Set of Interrogatories from Plaintiff to Defendant Clinton" (the "Interrogatories," a true copy of which has already been filed with this Court as Exhibit 1 to Plaintiff's Motion to Compel Responses to Plaintiff's Second Set of Interrogatories to Defendant Clinton and which is incorporated herein). Defendant Clinton refused to provide answers to several of the

Interrogatories, including Interrogatories Nos. 10 and 11. After this Court entered its Order (the "Order") of December 11, 1997 on Plaintiff's Motion to Compel Responses to these Interrogatories, Defendant Clinton filed "President Clinton's Supplemental Responses to Plaintiff's Second Set of Interrogatories" (the "Responses," a true copy of which is attached hereto as Exhibit A). The Responses are prefaced by a paragraph that attempts to condition the Responses on vague, ambiguous, and unauthorized grounds. Specifically, the Responses state that Defendant Clinton considers the Interrogatories to have been modified by the Court's Order *and the discovery conferences held on these issues*.

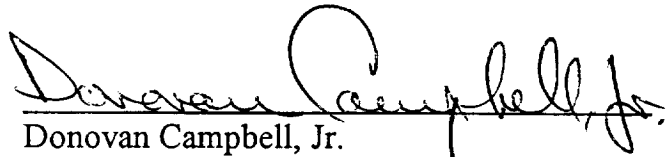
2. This Court's Order of December 11, 1997 certainly controls the responses that must be provided by Defendant Clinton. However, any attempt to condition the Responses upon supposed modifications made to the Interrogatories in *discovery conferences* is improper. There has been no order from this Court modifying or in any way addressing the Interrogatories, other than the December 11, 1997 Order. That Order is self explanatory. No additional conditions or limitations to the interrogatories or the Responses are proper, and all such conditions should be stricken.¹

3. Plaintiff requests that this Court compel Defendant Clinton to refile and re-verify his responses to Plaintiff's Second Set of Interrogatories deleting all conditions and limitations to the responses and the interrogatories other than this Court's December 11,

¹Plaintiff notes that Defendant Clinton attempts to restate the Court's ruling in summary form in the introductory paragraph to his Responses. Plaintiff does not necessarily agree with Defendant Clinton's interpretation of the December 11, 1997 Order but believes that the Order will speak for itself.

1997 Order, or, alternatively, that this Court strike the modifying language “and the discovery conferences held on these issues” from President Clinton’s Supplemental Responses to Plaintiff’s Second Set of Interrogatories and declare that the responses, as so amended, constitute the official verified Responses of Defendant Clinton herein. Plaintiff also requests any other or further relief to which she is entitled.

Respectfully submitted,



Donovan Campbell, Jr.
State Bar of Texas No. 03725300
James A. Fisher
State Bar of Texas No. 07051650
Robert E. Rader, Jr.
State Bar of Texas No. 16453000
David M. Pyke
State Bar of Texas No. 16419700
T. Wesley Holmes
State Bar of Texas No. 09908495
J. McCord Wilson
State Bar of Texas No. 00785266

RADER, CAMPBELL, FISHER & PYKE
(A PROFESSIONAL CORPORATION)
Stemmons Place, Suite 1080
2777 Stemmons Freeway
Dallas, Texas 75207
Telephone: (214) 630-4700
Facsimile: (214) 630-9996

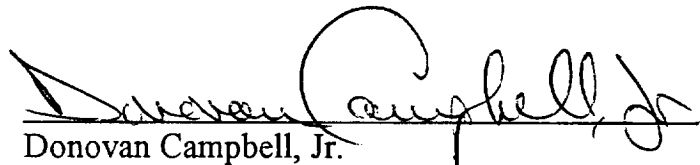
ATTORNEYS FOR PLAINTIFF
PAULA JONES

OF COUNSEL:

John W. Whitehead
Steven H. Aden
Participating Attorneys on Behalf of
THE RUTHERFORD INSTITUTE
Post Office Box 7482
1445 East Rio Road
Charlottesville, Virginia 22906-7482
Telephone: (804) 978-3888
Facsimile: (804) 978-1789

CERTIFICATE OF CONFERENCE

I hereby certify that Plaintiff's counsel has in good faith conferred with Defendant Clinton's counsel on the specific issue in dispute and that same are not able to resolve their disagreements without the intervention of the Court.


Donovan Campbell, Jr.

CERTIFICATE OF SERVICE

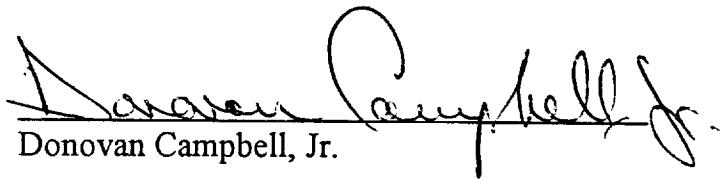
I hereby certify that on January 14, 1998, a true and correct copy of the foregoing document (including the accompanying exhibits and attachments, if any) was served on all parties by service on their counsel of record at the addresses set forth below, in compliance with FED. R. CIV. P. 5.

Robert S. Bennett
Skadden, Arps, Slate, Meagher & Flom LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111

Kathlyn Graves
Wright, Lindsey & Jennings
200 West Capitol Avenue
Suite 2200
Little Rock, Arkansas 72201

Stephen Engstrom
Wilson, Engstrom, Corum, Dudley & Coulter
809 West Third Street
Little Rock, Arkansas 72202

Bill W. Bristow
216 East Washington
Jonesboro, Arkansas 72401

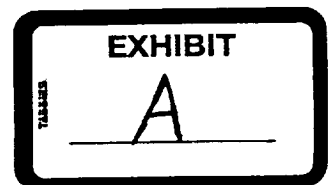

Donovan Campbell, Jr.

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

PAULA CORBIN JONES, :
 :
 Plaintiff, : CIVIL ACTION
 : NO. LR-C-94-290
 v. :
 :
 WILLIAM JEFFERSON CLINTON : Judge Susan Webber Wright
 :
 and :
 : UNDER SEAL
 DANNY FERGUSON, :
 :
 Defendants. :

**PRESIDENT CLINTON'S SUPPLEMENTAL RESPONSES
TO PLAINTIFF'S SECOND SET OF INTERROGATORIES**

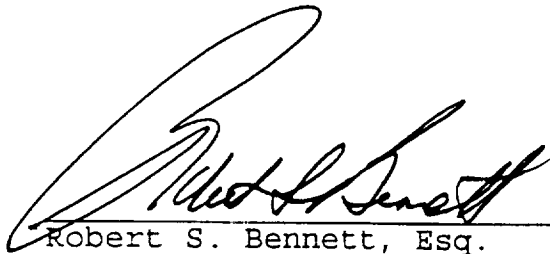
Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, President Clinton, through counsel, submits the following supplemental responses to Plaintiff's Second Set of Interrogatories pursuant to and in accordance with the Court's Order dated December 11, 1997. In this regard, in providing these supplemental responses, President Clinton considers each of the interrogatories to have been modified in scope and content as directed by the Court's Order and the discovery conferences held on these issues. Specifically, the relevant time period established by the Court is May 8, 1986 to the present. The subject matter of the interrogatories has been modified to encompass individuals who were state or federal employees, or whose liasons with then-Governor Clinton were procured, protected, concealed, and/or facilitated by State Troopers assigned to his security detail.



SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10 (as modified by direction of the Court): None.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11 (as modified by direction of the Court): None.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 17 (as modified by direction of the Court): As Governor of Arkansas and President of the United States, Mr. Clinton has attended literally hundreds of meetings both on and off state and federal property between 1986 and the present, and cannot recall which, if any, meetings were attended only by himself and a federal or state female employee at a location other than his office. Accordingly, he is unable to identify who, if anyone, arranged such a meeting. If it were necessary to attend a private meeting with a female or male outside the office, such meetings would have been arranged by either the office of the person with whom he met, by a member of his staff or by himself. See also supplemental responses to Interrogatories 10 and 11 above.



Robert S. Bennett, Esq.
Carl S. Rauh, Esq.
Mitchell S. Ettinger, Esq.
Amy Sabrin, Esq.
Katharine S. Sexton, Esq.
Ellen L. Lyons, 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 & JENNINGS
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

VERIFICATION

I, William Jefferson Clinton, declare as follows:

I have read the foregoing supplemental responses to Plaintiff's Second Set of Interrogatories and declare under penalty of perjury that they are true and correct to the best of my knowledge and belief.

Executed this 23rd day of December, 1997.



William Jefferson Clinton

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December, 1997, a true and correct copy of President Clinton's Supplemental Responses to Plaintiff's Second Set of Interrogatories was served via facsimile and federal express to:

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



Mitchell S. Ettinger