

FILED

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

JAN 23 1998

PAULA CORBIN JONES,
Plaintiff,

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

vs.

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

WILLIAM JEFFERSON CLINTON
And DANNY FERGUSON,

Judge Susan Webber Wright

Defendants.

FILED UNDER SEAL

PROTECTIVE ORDER

WHEREAS, Amy Paul ("Paul") and Bruce W. Eberle & Associates, Inc. ("Eberle") claim that certain documents requested to be produced by Paul for inspection and copying by the defendant William Jefferson Clinton ("The President") contain information that must be kept confidential in order to protect the privacy rights of donors to the Paula Jones Legal Fund ("PJLF"), and the legitimate business interests and privacy rights of Paul and Eberle and its clients:

IT IS HEREBY ORDERED as follows:

1. During the pending of C.A. No. LR-C-94-290 in the United States District Court for the Eastern District of Arkansas, Western Division (the "Action"), and any appeals from the decision of that Court in that case, and/or until this Protective Order is amended or superseded or vacated, all parties will comply with the following procedures set forth with respect to documents received from Paul and Eberle:

(a) Confidential Documents.

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(i) Paul and Eberle, through their counsel, may in good faith designate as confidential ^{produced by them} any document [^] reflecting contracts and account records of Paul and Eberle with its clients (hereinafter "confidential documents").

AMS
FHC

(ii) Except as otherwise provided herein, such confidential documents (including the existence of such documents and the information contained herein) so designated by Paul and Eberle as confidential and made available to any party shall be treated by the parties and their attorneys as confidential for use solely for the purpose of the Action and shall not be disclosed to any other persons. Further, parties shall notify counsel for Paul and Eberle in the event they contact any individual or entities whose names are obtained ^{exclusively} [^] from any documents designated as confidential by Paul or Eberle.

(iii) If a party objects to the designation of any document as confidential, the party may, after consultation with counsel for Paul or Eberle, seek relief from the Court.

(b) Confidentiality Agreement.

(i) Prior to any disclosure of confidential documents to any person (including any expert or consultant retained to assist in pretrial proceedings, preparation, settlement or trial of this action) to whom disclosure of a confidential document is to be made, such persons shall:

(A) be advised by counsel making such disclosure that the Court has ordered that such documents and information shall be kept confidential and may not be disclosed in

any form or used for any purpose whatsoever other than those
aforementioned;

(B) read this Protective Order; and

(C) sign a copy of the Confidentiality Agreement attached hereto as Exhibit "A" thereby becoming subject to this Protective Order.

(ii) A copy of each executed Confidentiality Agreement shall be maintained by counsel for ~~the President~~ ^{any party} in a secure place. If an issue is raised as to whether any provision of this Protective Order has been violated, ~~the President's~~ counsel shall produce to Paul and Eberle's counsel a copy of such Confidentiality Agreements as may be pertinent to such issue.

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AVS

2. The Orders filed November 25, 1997, and December 4, 1997, in Paula Corbin Jones v. William Jefferson Clinton and Danny Ferguson, C. A. No. LR-C-94-290, in the United States District Court for the Eastern District of Arkansas, Western Division, are incorporated herein and shall govern the production of documents and information regarding donors to the Paula Jones Legal Fund.

3. Use in Briefs or as Exhibits (Other Than At Trial). The confidentiality of documents used as exhibits to or incorporated in any other manner in briefs, memoranda or other documents filed with the Court shall be protected as follows:

(a) to the extent that any brief, memoranda, or other document (including deposition transcripts) submitted to a Court incorporates or refers to the substance of any information contained in any confidential document, such brief, memorandum, or other document or portions therefor shall be filed under seal;

(b) confidential documents that are made a part of the record shall be filed with the Court under seal; and

(c) The Court in its discretion may determine to release any such confidential information.

4. Return or Destruction of Confidential Documents. At the final conclusion of the action (including any appeal or retrial thereof), ~~the President's~~ ^{the parties,} counsel and every person to whom confidential documents have been disclosed shall return to counsel for Paul and Eberle or, with consent of Paul and Eberle's counsel, destroy all such documents including any copies, extracts or summaries thereof or documents containing information taken therefrom. The work product of counsel for any party, depositions and/or briefs which contain confidential documents, or information from confidential documents, may be ~~returned~~ ^{retained} or destroyed at counsel's discretion.

5. Use at Trial. The designation of any documents as confidential pursuant to this Protective Order shall not, in and of itself, preclude the use of any confidential document, or information therefrom, at the trial of this action. Nothing herein, however, shall preclude Paul and Eberle from further seeking any available protection with respect to any confidential document or the contents thereof.

Dated: January 23, 1998

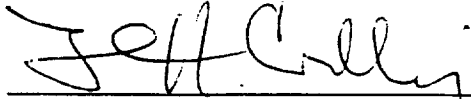
Oliver W. K. [Signature]
JUDGE

THIS DOCUMENT ENTERED ON DOCKET SHEET IN
COMPLIANCE WITH RULE 63 AND/OR 79(a) FRCP
ON 1/23/98 BY VI

AKS
FKC

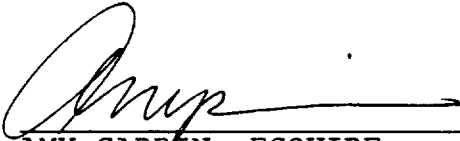
AKS
FKC

WE ASK FOR THIS:



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(703) 591-1870

SEEN AND AGREED:



AMY SABRIN, ESQUIRE
Counsel for William Jefferson Clinton
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D. C. 20005
(202) 371-7000

Confidentiality Agreement

I, _____, have read the Protective Order entered by the United States District Court for the Eastern District of Arkansas, Western Division, in Jones v. Clinton, et al., C.A. No. LR-C-94-290. I agree to be bound by the Protective Order and submit myself to the jurisdiction of that Court for purposes of enforcing the Order respecting maintaining the confidentiality of the documents provided to me.

Date

UNITED STATES DISTRICT COURT
Eastern District of Arkansas
U.S. Post Office & Court House
600 West Capitol, Suite 402
Little Rock, Arkansas 72201-3325

January 23, 1998

* * MAILING CERTIFICATE OF CLERK * *

Re: 4:94-cv-00290.

True and correct copies of the attached were mailed by the clerk to the following:

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Sarasota, VA 22030

James W. McCormack, Clerk

Date:

1/23/98

BY:

Nicki Turner