

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

FEB 12 1998

JAMES W. MCCORMACK, CLERK
By: 
DEP CLERK

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

PAULA JONES,

Plaintiff,

v.

WILLIAM JEFFERSON CLINTON
and DANNY FERGUSON,

Defendants.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. LR-C-94-290

Judge Susan Webber Wright

(UNDER SEAL)

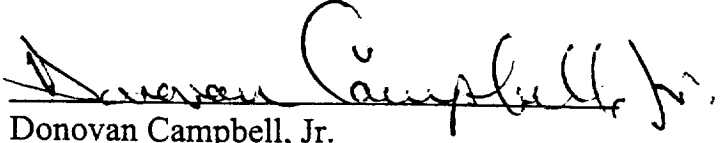
**PLAINTIFF'S NOTICE OF DOCUMENTS
PRODUCED TO OFFICE OF INDEPENDENT
COUNSEL PURSUANT TO SUBPOENA**

In accordance with this Court's oral ruling on January 27, 1998, concerning the Motion of the United States for Limited Intervention and for Modification of October 30, 1997 Protective Order (the "Motion") filed herein on or about January 27, 1998 by the Office of Independent Counsel ("OIC"), Plaintiff hereby advises the Court and the parties hereto of the documents produced to the OIC and to the Grand Jury in accordance with the Subpoena to Testify Before Grand Jury (the "Subpoena") issued by the OIC to Plaintiff's counsel herein on or about February 4, 1998.

Plaintiff hereby gives notice that, on or about February 10, 1998, those documents set forth on the Index attached hereto as Exhibit A and incorporated herein were produced by Plaintiff's counsel to the OIC.

293

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 SERVICE

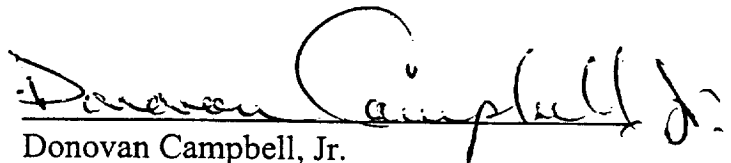
I hereby certify that on February 10, 1998, a true and correct copy of the foregoing document (including the accompanying exhibits and attachments, if any) was served on all parties by service on their counsel of record by telecopy transmittal, overnight delivery, and/or U.S. Mail at the addresses set forth below, in compliance with FED. R. CIV. P. 5.

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

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

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

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


Donovan Campbell, Jr.

Jones v. Clinton, et al.; LR-C-94-290
U. S. District Court for the Eastern District of Arkansas

**INDEX TO COPIES OF DOCUMENTS PRODUCED TO
THE OFFICE OF THE INDEPENDENT COUNSEL 2/10/98**

Tab A

Deposition Subpoena Duces Tecum to Monica Lewinsky

Plaintiff's Notice Duces Tecum of the Deposition Upon Oral Examination of Monica
Lewinsky

Supplemental Memorandum of Law in Support of Motion for Protective Order

Tab B

[Reserved for Kathleen Willey materials]

Tab C

Copy of transcript of the Oral Deposition of [REDACTED] Vol. I (including condensed
transcript)

Copy of transcript of the Oral Deposition of [REDACTED], Vol. II. (including
condensed transcript)

Copy of transcript of the Oral Deposition of Jane Doe [REDACTED], Vol. III.
(including condensed transcript)

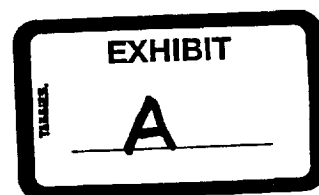
Deposition Subpoena Duces Tecum to [REDACTED]

Plaintiff's Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]
[REDACTED]

Plaintiff's Amended Notice Duces Tecum of the Deposition Upon Oral Examination of
[REDACTED]

Motion of Jane Doe [REDACTED] to Terminate or Limit Examination

Plaintiff's Memorandum in Opposition to the Motion of [REDACTED] to Terminate or
to Limit Her Deposition and to Protect Constitutional Privilege



Jane Doe [REDACTED] Motion to Show Cause

Brief in Support of Jane Doe [REDACTED] Motion to Show Cause

Protective Order (filed 12/3/97 regarding Jane Doe [REDACTED])

Plaintiff's Statement in Opposition to Jane Doe [REDACTED] Motion to Show Cause

Motion of Jane Doe [REDACTED] for an Extension of Time to Respond to Plaintiff's Motion to Compel Order (filed 12/11/97 regarding Jane Doe [REDACTED])

Plaintiff's Motion to Compel Jane Doe [REDACTED], Jane Doe [REDACTED], and Jane Doe [REDACTED] to Answer Deposition Questions, and Motion to Prevent Further Obstruction of Depositions

President Clinton's Opposition to Plaintiff's Motion to Compel Jane Doe [REDACTED], Jane Doe [REDACTED] and Jane Doe [REDACTED]

Jane Doe [REDACTED] Response to Motion to Compel

Brief in Support of Response of Jane Doe [REDACTED] to Motion to Compel

Order (filed 12/18/97 regarding Jane Doe [REDACTED], Jane Doe [REDACTED] and Jane Doe [REDACTED])

Order filed (1/5/98 regarding Jane Doe [REDACTED])

Order (filed 1/9/98 regarding Jane Doe [REDACTED])

Tab D

Copy of transcript of the Videotaped Oral Deposition of [REDACTED], Vol. I. (including Certificate of Authenticity for Video Deposition of [REDACTED])

Copy of transcript of the Oral Deposition of Jane Doe [REDACTED], Vol. II. (including Certificate of Authenticity for Video Deposition of [REDACTED])

Deposition Subpoena Duces Tecum to [REDACTED]

Plaintiff's Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]

Plaintiff's Amended Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]
[REDACTED] (11/12/97)

Plaintiff's Amended Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]
[REDACTED] (11/21/97)

Motion for a Protective Order and Motion to Quash Subpoena Duces Tecum and Notice of Deposition

Brief in Support of Motion for Protective Order and Motion to Quash

Plaintiff's Memorandum in Opposition to the Motion of "Jane Doe [REDACTED]" for Protective Order and Motion to Quash Subpoena Dues [sic] Tecum and Notice of Deposition

Response of Jane Doe [REDACTED] to Plaintiff's Motion to Compel Jane Doe [REDACTED], Jane Doe [REDACTED], and Jane Doe [REDACTED] to Answer Deposition Questions, and Motion to Prevent Further Obstruction of Depositions

Agreed Protective Order

Tab E

Copy of transcript of the Videotaped Oral Deposition of [REDACTED], Vol. I. (including condensed transcript and Certificate of Authenticity for Video Deposition)

Deposition Subpoena Duces Tecum to [REDACTED]

Plaintiff's Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]

Plaintiff's Amended Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]
[REDACTED]

Motion for Protective Order and Motion to Quash Subpoena Duces Tecum and Notice of Deposition

Brief in Support of Motion for Protective Order and Motion to Quash Subpoena Duces Tecum and Notice of Deposition

Plaintiff's Second Amended Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]

Plaintiff's Third Amended Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]

Tab F

Copy of transcript of the Oral Deposition of [REDACTED], Vol. I. (including copy of condensed transcript)

Deposition Subpoena Duces Tecum to [REDACTED]

Plaintiff's Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]

Letter dated 11/17/97 from David Pyke, Rader, Campbell, Fisher & Pyke to [REDACTED] (including Affidavit of Service of same)

Motion to Quash Subpoena and for Protective Order

Motion for Protective Order and Designation as Jane Doe

Tab G

Copy of transcript of the Oral Deposition of Jane Doe [REDACTED] (including copy of condensed transcript and excerpts)

Trial Subpoena Duces Tecum to [REDACTED]

Trial Subpoena Duces Tecum to [REDACTED]

Deposition Subpoena Duces Tecum to [REDACTED]

Plaintiff's Notice Duces Tecum of the Deposition Upon Oral Examination of [REDACTED]

Motion for a Protective Order and to Quash Subpoena Duces Tecum and Deposition Subpoena

Memorandum in Support of Motion for Protective Order and Motion to Quash

Plaintiff's Response to Motion of Jane Doe to Quash Deposition Subpoena

Tab H

Copy of transcript of the Videotaped Oral Deposition of [REDACTED]
(including copy of condensed transcript and ASCII diskette)

Deposition Subpoena to [REDACTED] (including Declaration Re: Non Service)

Deposition Subpoena Duces Tecum to [REDACTED] (1/19/98)

Deposition Subpoena Duces Tecum to [REDACTED] (1/25/98)

Deposition Subpoena Duces Tecum to [REDACTED] (dated 1/26/98 including a copy of a letter agreement of even date authorizing acceptance of service for [REDACTED])

Plaintiff's Notice of the Deposition Upon Oral Examination of [REDACTED]

Objections to Plaintiff's Request for Production of Documents for [REDACTED]

Objections to Plaintiff's Request for Production of Documents for "Jane Doe No. ____"

Tab I

ASCII diskette containing depositions of Jane Does [REDACTED]