

Issued by the  
**UNITED STATES DISTRICT COURT**  
 DISTRICT OF COLUMBIA

**PAULA JONES,***Plaintiff,*

V.

**SUBPOENA IN A CIVIL CASE**CASE NUMBER:<sup>1</sup>

LR-C-94-290

**WILLIAM JEFFERSON CLINTON***and***DANNY FERGUSON,***Defendants.***COPY**TO: **MONICA LEWINSKY**  


YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION The Rutherford Institute 733 15th Street NW., Suite 410 Washington, DC 20005	DATE AND TIME Friday, January 23, 1998 9:30 a.m.
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YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

Exhibit A, attached hereto.

PLACE The Rutherford Institute 733 15th Street NW., Suite 410 Washington, DC 20005	DATE AND TIME Friday, January 23, 1998 9:30 a.m.
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person designated, the matters on which the person will testify, Federal Rules of Civil Procedure, 30(b) (6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  , ATTORNEY FOR PLAINTIFF	DATE December 17, 1997
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ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER  
 Donovan Campbell, Jr., Rader, Campbell, Fisher & Pyke, Stemmons Place, Suite 1080,  
 2777 Stemmons Freeway, Dallas, Texas 75207, (214) 630-4700

902-DC-00000135

(See Rule 45, Federal Rules of Civil Procedure, Parts C &amp; D on Reverse)

<sup>1</sup> If action is pending in district other than district of issuance, state district under case number.

**EXHIBIT A****DOCUMENTS AND THINGS TO BE PRODUCED**

Pursuant to the Federal Rules of Civil Procedure, the Deponent is directed to produce, at the time and place of the Deponent's deposition, all of the documents and tangible things described in the enumerated requests below. In responding to the following requests for production, the Deponent is directed to comply with the following instructions and to apply the following definitions.

**DEFINITIONS**

For the purposes of these requests, the following definitions apply:

"Defendant Clinton" means William Jefferson Clinton.

"Defendant Ferguson" means Danny Ferguson.

"Document" means any tangible thing on which appears, or in which is stored or contained, any words, numbers, symbols, or images. The term "document" includes any and all writings, drawings, graphs, charts, photographs, tape recordings, video recordings, phonorecords, and other data compilations from which information can be obtained and translated, if necessary, through detection devices, into reasonably usable form.

"Person" means any identifiable entity, including but not limited to individuals, corporations, partnerships, sole proprietorships, and unincorporated associations.

"You" means the Deponent.

**INSTRUCTIONS**

A request for any particular document or thing is a request for the original, for each and every photocopy or duplicate of that document or thing, and for each and every draft of the document or thing. If, however, you produce the original of the document or thing, you are not required to produce any photocopies or duplicates unless they are not identical (as, for example, when marginal notations are made on a copy).

The documents and things to be produced should, at the time of production, be organized and labeled to correspond to the enumerated requests below. In the alternative, they may be produced as they are kept in the ordinary course of business, if it is possible to do so.

902-DC-00000136

DEC -19 97 (FRI) 14:15 RADER CAMPBELL

TEL: 214 630 9996

You are to produce not only the documents and things in your immediate possession, but also those over which you have custody or control, including but not limited to documents and things in the possession, custody, or control of your agent(s), your accountant(s), your attorney(s), any investigator employed by you or by your attorney(s), or any consultant or expert witness employed by you or by your attorney(s).

If, in response to a particular request, an objection is interposed, and the objection applies to some but not all of the documents requested, please produce all responsive documents and things to which the objection does not apply.

### REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Every document relating to any private meetings between you and Defendant Clinton, including any agendas, letters, journals, diaries, notes, tape recordings or memoranda.

REQUEST FOR PRODUCTION NO. 2: Every document constituting or containing communications between you and Defendant Clinton, including letters, cards, notes, memoranda, and all telephone records, notes or memoranda reflecting calls to or from any telephone in the White House, the Pentagon, any governmental office or property, or your home or office, any cellular or mobile telephone, or to or from any other telephone numbers of Bill Clinton or you or anyone acting for or on behalf of him or you.

REQUEST FOR PRODUCTION NO. 3: Every document concerning any communications with persons other than Defendant Clinton which reference any relationship or any private meetings between you and Defendant Clinton.

REQUEST FOR PRODUCTION NO. 4: Every document concerning any communications with persons other than Defendant Clinton which reference any relationship or any private meetings between you and Defendant Clinton.

REQUEST FOR PRODUCTION NO. 5: Every calendar or address book or other document reflecting any meetings between you and Defendant Clinton or reflecting the address or telephone number of Defendant Clinton at any location.

REQUEST FOR PRODUCTION NO. 6: Every document relating to any communications with anyone concerning any occurrence involving you and Defendant Clinton, including any agendas, letters, journals, diaries, notes, time records, employment records, tape recordings or memoranda.

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EXHIBIT A - DOCUMENTS AND THINGS TO BE PRODUCED

DEC. -19 97 (FRI) 14:16 RADER, CAMPBELL

TEL: 214 630 9990

REQUEST FOR PRODUCTION NO. 7: Please produce each and every gift including, but not limited to, any and all dresses, accessories, and jewelry, and/or hat pins given to you by, or on behalf of, Defendant Clinton.

REQUEST FOR PRODUCTION NO. 8: Please produce each and every document mentioning or describing any gift given to you by Defendant Clinton.

902-DC-00000138

EXHIBIT A - DOCUMENTS AND THINGS TO BE PRODUCED