

Issued by the
 UNITED STATES DISTRICT COURT
 DISTRICT OF COLUMBIA

PAULA JONES,

Plaintiff,

v.

SUBPOENA IN A CIVIL CASE

CASE NUMBER:¹

LR-C-94-290

WILLIAM JEFFERSON CLINTON

and

DANNY FERGUSON,

Defendants.

920-DC-00000013

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.

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.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES

DATE AND TIME

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)

DATE

Donovan Campbell Jr., ATTORNEY FOR PLAINTIFF

December 17, 1997

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

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

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

PROOF OF SERVICE

Date	Place
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
Date

Signature of Server

Address of Server

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

PROOF OF SERVICE

Date Place

SERVED

12-19-97 AT 4:00 P.M.

THE PENTAGON, ARLINGTON, VA

SERVED ON (PRINT NAME)

MANNER OF SERVICE

MONICA LEWINSKY

PERSONALLY

SERVED BY (PRINT NAME)

TITLE

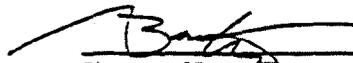
BRIAN HARTE

PRIVATE PROCESS SERVER

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on 12-22-97
Date


Signature of Server

CAPITOL PROCESS SERVICES
1827 18TH STREET, N.W.
Address of Server WASHINGTON, D.C. 20009
(202) 667-0050

Rule 45, Federal Rules of Civil Procedure, Parts C & D:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fees.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;
(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or
(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

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(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

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, phono records, 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.

920-DC-00000016

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.

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.

920-DC-00000017

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.

920-DC-00000018