106TH CONGRESS
1st Session

SENATE

DOCUMENT
106–3

IMPEACHMENT OF PRESIDENT WILLIAM JEFFERSON CLINTON

THE EVIDENTIARY RECORD PURSUANT TO S. RES. 16

VOLUME XXII

Publicly available portions of the Deposition of William Jefferson Clinton in *Jones* v. *Clinton*

AND

All Documents publically available from the docket in *Jones* v. *Clinton*

AND

Errata material to Referral From Independent Counsel Kenneth Starr, House Document 105-310

Printed at the direction of Gary Sisco, Secretary of the Senate, pursuant to S. Res. 16, 106th Cong., 1st Sess. (1999)

JANUARY 8, 1999.—Ordered to be printed

* (Star Print)

AUTHENTICATED
U.S. GOVERNMENT
INFORMATION
GPO

IN THE SENATE OF THE UNITED STATES
Sitting as a Court of Impeachment

In Re	)
	)
Impeachment of	)
President William Jefferson Clinton	)

Factual Record

Publically Available Portions of the Deposition of
William Jefferson Clinton
in *Jones v. Clinton*
C.A. No. LR-C-94-290
District Court of the United States
for the Eastern District of Arkansas
January 17, 1998

The United States
House of Representatives

HENRY J. HYDE
F. JAMES SENSENBRENNER, JR.
BILL McCOLLUM
GEORGE W. GEKAS
CHARLES T. CANADY
STEPHEN E. BUYER
ED BRYANT
STEVE CHABOT
BOB BARR
ASA HUTCHINSON
CHRIS CANNON
JAMES E. ROGAN
LINDSEY O. GRAHAM

Managers on the Part of the House

POLITICS
Jones v. Clinton
SPECIAL R
Y2K: One year and counting...
www.policy.com

98
window fashions with style
WIN FREE CLASSES!

President Clinton's Deposition

Released on Friday, March 13, 1998

Following is the full text of those portions of President Clinton's deposition in the Paula Jones sexual harassment lawsuit that have been made public.

The deposition was made public on March 13 by Jones's lawyers, as part of their response to the Clinton legal team's motion to have the case thrown out.

The deposition spans 215 printed pages. Of those, 88 pages are missing from the Jones submission. Gaps are marked below. In some cases, Jones's attorneys replaced the names of women with the name "Jane Doe." Jane Doe 1 is longtime Clinton friend Marilyn Jo Jenkins; Jane Doe 2 is longtime friend Beth Coulson; Jane Doe 6 is former intern Monica Lewinsky; and Jane Doe 7 is Shelia Davis Lawrence, widow of M. Larry Lawrence, whose body was exhumed from Arlington National Cemetery last year after it was discovered that he fabricated a World War II service record.

The deposition began at 10:30 a.m. on Jan. 17, 1998, and was held at the downtown Washington offices of Clinton's attorney, Robert S. Bennett. It lasted about six hours. Jones's lawyer James A. Fisher questioned the president.

Related Links
- Highlights of This Deposition
- Full Coverage: Clinton Accused
- Full Text of Other Legal Documents
- Jones Filings Detail Sex Allegations (Washington Post, March 14)
- In Deposition, Clinton Denied Initiating Lewinsky Aid (Washington Post, March 5)

- Definition of Sexual Relations
- Regarding Kathleen Willey
- Regarding Monica Lewinsky
- Events at the Excelsior Hotel
- Regarding the Troopers
- Regarding Gennifer Flowers and Dolly Kyle Browning
- Cross Examination by Ferguson Lawyer Bill Bristow
- Cross Examination by Clinton Lawyer Robert Bennett

Defining Sex

TEXT STARTS ON PAGE 25

MR. FISHER: Yes, Your Honor. What I'm trying to do is avoid having to ask the president a number of very salacious questions and to make this as discreet as possible. This definition, I think the Court will find, is taken directly from Rule 413, which I believe President Clinton signed into law, with the exception that I have narrowed subpart one to a particular section, which would be covered by Rule 413, and I have that section here to give the president so

Editor's Note: The Jones legal team submitted the following "Definition of Sexual Relations" to the court: For the purposes of this deposition, a person engages in "sexual relations" when the person knowingly engages in or causes -
(1) contact with the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to arouse or gratify the sexual desire of any person;
(2) contact between any part of the person's body or an object and the genitals or anus of

section here to give the president so that there is no question what is intended. This will eliminate confusion, not cause it.

> another person; or
> (3) contact between the genitals or anus of the person and any part of another person's body. "Contact" means intentional touching, either directly or through clothing."

MR. [ROBERT] BENNETT [the president's attorney]: Your Honor, I have no objection where the appropriate predicates are made for them to ask the president, did you know X, yes or no, what happened, what did you do, what didn't you do. We are – we acknowledge that some embarrassing questions will be asked, but then we all will know what we're talking about, but I do not want my client answering questions not understanding exactly what these folks are talking about.

Now, Your Honor, I told you that the president has a meeting at four o'clock and we've already wasted twenty minutes, and Mr. Fisher has yet to ask him first factual question.

JUDGE [SUSAN WEBBER] WRIGHT: Well, I'm prepared to rule, and I will not permit this definition to be understood. Quite frankly, there's several reasons. One is that the Court heretofore has not proceeded using these definitions. We have used, we've made numerous rulings or the Court has made numerous rulings in this case without specific reference to these definitions, and so if you want to know the truth, I don't know them very well. I would find it difficult to make rulings, and Mr. Bennett has made clear that he acknowledges that embarrassing questions will be asked, and if this is in fact an effort on, on the part of Plaintiff's Counsel to avoid using sexual terms and avoid going into great detail about what might or might not have occurred, then there's no need to worry about that, you may go into the detail.

MR. BENNETT: If the predicates are met, we have no objection to the detail.

MR. Fisher: Thank you, Your Honor.

JUDGE WRIGHT: It's just going to make it very difficult for me to rule, if you want to know the truth, and I'm not sure Mr. Clinton knows all these definitions, anyway.

Regarding Kathleen Willey

Q. Mr. Clinton, do you know a woman named Kathleen Willey?

A. I do.

Q. When did you meet her for the first time?

A. I believe in the presidential campaign of 1992 in Virginia.

Q. She was married to a man named Edward E. Willey Jr., before he passed away, correct?

A. That's right.

Q. And she and her husband donated money to your presidential campaign in 1992, correct?

A. That's correct.

Editor's Note: Kathleen Willey and her husband, Edward E. Willey Jr., were prominent Democratic fund-raisers in Richmond. After President Clinton took office, she worked as a volunteer in the White House social office. On Nov. 29, 1993, she went to see Clinton about getting a full-time job because her husband's real estate business was nearing bankruptcy. According to Willey's sworn statements, Clinton made an uninvited sexual advance, kissing and groping her, in a secluded corridor just off the Oval Office. Unbeknownst to Clinton or Willey, her husband had committed suicide that afternoon.

Q. And Kathleen Willey and her husband also did some fund-raising work for your campaign, correct?

A. I believe that's right. I'm not sure, but I think they did.

Q. If she were to describe herself as a Democratic party activist, would you disagree with that characterization of her?

A. No. I believe she was actually working very closely with Gov. Wilder in Virginia in 1992 at the time I was running for president.

Q. All right, sir. On election night in November 1992, did Kathleen Willey and her husband travel to Little Rock, Arkansas?

A. I have no idea.

Q. You don't recall seeing them in Little Rock that night?

A. No. But, you know, we stayed up late and there were hundreds, thousands of people there. I don't know whether they were there or not.

Q. Do you recall that after the election you personally called Kathleen Willey and, to thank her for helping you to be elected president?

A. No, I don't remember that.

Q. After you became president, she got a job working in the White House, correct?

A. I believe she worked in the social office. I seem to remember she started as a volunteer. I'm not sure, but I think she was a volunteer.

Q. All right, sir. Do you recall that she was living in Richmond,

Virginia, at that time and commuting all the way to Washington?

A. Yeah, I knew that she and Ed lived in Richmond.

Q. Do you recall approximately when she was working in the White House as a volunteer?

A. No, I don't even – I don't know how many days a week she worked and what hours she worked.

Q. Have you read any part of the deposition testimony given by Kathleen Willey in this case?

A. No, but I have seen a summary of it.

Q. All right, sir. Let me hand you what has been marked Deposition Exhibit 3. I would like to direct your attention to subpart (b) which is about halfway down on the first page. This I will represent to you is a copy of Section 2244 and Section 2245 of Title 18 of the United States Code.

MR. BENNETT: Excuse me, Your Honor. I must object. This is a civil section harassment case, and he has handed the president a criminal statute.

Q. Mr. President, did Kathleen Willey ever give you permission to touch her breasts?

A. No, I never asked, and I never did.

Q. Did she ever give you permission to kiss her on the lips?

A. No.

Q. Did you ever attempt to kiss her on the lips?

A. No.

Q. Did you ever attempt to touch her breasts?

A. No.

Q. Did Kathleen Willey ever give you permission to take her hand and place it on your genitals?

A. No, she didn't.

Q. Did you at any time have any form of sexual relations with Kathleen Willey?

A. No, I didn't.

Q. Do you recall, sir, that you met with Kathleen Willey at or near the time of her husband's death?

A. The meeting I recall occurred before her husband's death. She had requested, my recollection is that she requested several times to come in to see me. She wanted to come in and see me, and kept asking to

do that.

MR. BENNETT: Mr. President, just answer his questions, please, sir.

A. And my – and she did come in to see me.

Q. Do you recall whether that particular meeting you just described was before or after her husband's death?

A. That was before her husband's death.

Q. All right, sir. What, if anything, do you recall being said in that meeting?

A. Well, my recollection is that she, that originally she wanted to come in to talk about moving out of the social office where she was not happy, but when she came in – that's what I had been told the meeting was about. But when she came in, she said that, and she also said that she probably needed a paying job, but she was, she was very upset that day, I remember very well, and she didn't stay long, but she was quite agitated, and that was the only meeting I had with her, and she said that she was faced, she was afraid that they, she'd have to contribute to the family income, and she wanted a job.

Q. All right, sir. If she testified that that meeting occurred at about three o'clock in the afternoon, would you have any different recollection?

A. I don't have – I don't remember what time of day it occurred. I just remember she came in and stayed a few minutes and talked to me about her problems.

Q. Was anyone else present in the room while you were talking to her?

A. I don't think so, no.

Q. And was this conversation in the Oval Office?

A. I think it was partly in the Oval Office and partly in the dining room I have in the back, which is – my memory is she was quite upset, I asked her if she wanted something to drink, she said she did, we went back there, she got something to drink, I got something to drink, and I let her sit down at the table in the dining room, and that, and we talked a little there. I can't remember how much time we spent at which place, but she wasn't there very long.

Q. Is there a hallway leading from the Oval Office to this private dining room?

A. Yes. It's very short. It's probably 12, 15 feet long.

Q. How wide is it?

A. Not wide.

Q. What did you have to drink?

A. I don't remember.

Q. Was it alcoholic?

A. Oh, no, no, I don't serve alcohol there in the office of the White House.

Q. Not ever?

A. Never.

Q. Did she tell you that she and her husband had some large debts to pay?

A. I don't remember that. What I remember is that she was very – she was obviously agitated, and I'd never really had a conversation with her before so I, you know, except in public, I'd see her, and she always seemed sort of shy, you know, upbeat, positive, but this day she was clearly concerned, but I don't remember going into any great detail. What I remember her saying is that her family, that there was some family financial issues she had to deal with, and she needed to earn some money to work there, and I had, I don't remember her going into any great detail about it. I don't think she stayed long enough to go into any great detail, but she was clearly upset.

Q. Do you recall, sir, that she said that one reason she was upset was that her husband was missing?

A. No, I didn't know anything about her husband being missing until I learned that, that he was dead.

Q. Do you recall how many days passed before you learned that he had passed away?

A. I don't. I don't think it was very long, but I don't remember.

Q. She took a leave of absence after her husband died, correct?

A. I don't know what she did. When I heard that he was dead and that he apparently killed himself, I called her and expressed my condolences and said that she could take whatever time she needed. It was a brief call, but I remember that call and I don't know exactly what she did, when she came back, or what the other facts are.

Q. Do you recall telling anyone in the White House that as soon as she did come back, you wanted to meet with her?

A. No, but I, I might well have said something like that, I mean, when something that traumatic happens in someone's family, I might have wanted to say something, I just had one of my speech writers' wife just had a stroke. When he came back to work, I said something to him. I might have done it, but I don't remember.

Q. So if someone in the White House testified that you told them you wanted to see Kathleen Willey as soon as she returned from her bereavement, you wouldn't find that implausible testimony?

A. It might well have happened. I just don't remember.

Q. All right. Having read a summary of her testimony, are you aware that she has testified that you kissed her in the hallway between the Oval Office and the private kitchen?

A. I am aware of that.

Q. And you're aware that she testified that you took her hand and put it on your penis?

A. I'm aware of that.

Q. All right, and you deny that testimony?

A. I emphatically deny it. It did not happen.

Q. Do you know why she would tell a story like that if it weren't true?

A. No, sir, I don't. I don't know. She'd been through a lot, and apparently the, the financial difficulties were even greater than she thought they were at the time she talked to me. Her husband killed himself, she's been through a terrible time. I have – I can't say. All I can tell you is, in the first place, when she came to see me she was clearly upset. I did to her what I have done to scores and scores of men and women who have worked for me or been my friends over the years. I embraced her, I put my arms around her, I may have even kissed her on the forehead. There was nothing sexual about it. I was trying to help her calm down and trying to reassure her. She was in difficult condition. But I have no idea why she said what she did, or whether she now believes that actually happened. She's been through a terrible, terrible time in her life, and I have nothing else to say. I don't want to speculate about it.

Q. Has she ever asked you to pay her money in return for her not disclosing this story?

A. Not to my knowledge.

Q. Do you recall at any time in that meeting with Kathleen Willey saying to her, "I wanted to do that for a long time"?

A. No, sir. Let me remind you, Kathleen Willey asked for this meeting with me. I didn't ask for the meeting with her. I didn't say anything like that.

Q. Do you recall meeting with her again in the Oval Office after she returned from her bereavement?

A. I remember that, it seems to me that she came in there once with a friend of hers who was sick, who had cancer, and we had a picture taken. I think you have a copy of that picture. She, she may have come in and said goodbye briefly and had another picture taken when she left, but that's all I remember.

Q. All right. Do you recall any conversation with her about obtaining a paying job after she returned from her absence?

A. I don't.

Q. I'm talking about the absence caused by her husband's death?

A. I understand. No, I don't. I don't know if one occurred. I don't remember one.

Q. Do you recall, though, that at some point she did receive a job that was a paid position at the White House?

A. Yes, I believe that she went to work in the counsel's office.

Q. What was the process by which she received that job?

A. I don't know the answer to that. After she came to see me, and she was, as I said, clearly quite agitated, when she walked out I said to someone, maybe it was Nancy Hernreich was there who knew her –

MR. BENNETT: Keep your voice up, Mr. President.

A. Maybe it was Nancy Hernreich who was there and who knew her, perhaps it was someone else, that we ought to see if we could do something for her, and that's all I heard about it. I don't think I was notified when she got the job at the counsel's office, and I'm not aware of what she did there exactly, but I know that she did get a job in the counsel's office, which she held for some time.

Q. Who in the White House would be responsible for receiving applications for that job and making the decision who would receive it?

A. I'm not sure. The – Bob Nash runs the appointments operation, but I'm not sure that it would have gone through him. It might have gone to the person, might have gone to someone in the administrative line, like a deputy chief of staff or someone like that. I really don't know. Perhaps we can find out for you, but I just don't know.

Q. Is Mr. Nash's title Director of Presidential Personnel?

A. I don't think so. I think his title is Director of Appointments. I honestly don't know what his direct title is, but when I deal with him, we're dealing with appointments to boards and commissions and things like that.

Q. All right.

A. Ambassadorships, Cabinet, subcabinet.

Q. Now, you appointed Kathleen Willey to travel to Copenhagen to serve on the official delegation of the United States of America at a world summit for social development, true?

A. She went as a White House appointee. I'm not sure I knew in advance of her going that she was on the delegation. I don't believe I did. But I don't have any reason to know one way or the other. I'm not sure I knew who was on that delegation.

Q. She did in fact attend that world summit in March of 1995, correct?

A. I don't know if she did, but it, it, if that's what the record reflects, then she did.

Q. And then –

A. I have no direct knowledge of that. I don't remember who went for the United States.

Q. Was she appointed to serve on the official delegation of the United States of America at a convention on biological diversity in Jakarta, Indonesia?

A. I don't have any direct knowledge of that. Since, in preparing for this deposition, I have been informed that she was, but I don't believe that I knew about it at the time she went.

Q. Do you know who made the decision to place her on that delegation?

A. I don't. She had – was this after she had left the White House?

Q. Yes, sir.

A. She had friends in the White House who may well have recommended her for it. I don't believe that I did, but I just, I don't know anything about that.

Q. Can you shed any light on the process by which she was selected to serve on the delegation?

A. No. I'm sure there's someone in the White House who put that delegation together who could do so, but I can't. I don't know.

Q. If you wanted to find out the answer to that question, who would

you go ask?

A. I would ask either the, probably my deputy chief of staff, John Podesta, to find out. If it was a foreign trip, perhaps the, Mr. Nash. Katie McGinney, I don't know. But I have no idea how that particular delegation was put together.

Q. Are you aware that she was appointed to a position on the Board of Governors of the United Service Organizations Inc., also known as the USO?

A. I am now. When I was told about her, I do not remember appointing her, but that was a direct presidential appointment, so I assume at some point that I actually checked a piece of paper which had her name on it, perhaps some others, but I didn't remember it at the time until I learned it.

Q. That position on the USO Board of Governors has a three-year term, does it not?

A. I don't know. I make hundreds of those appointments and all those recommendations are put together by Mr. Nash. If I wanted to know why he was – literally in 90 percent, perhaps more, of the cases of all presidential appointments, they're sent to me on a piece of paper which says here's the appointment, here's the name of the person, and there's a brief description of the position and who has recommended the person and then accept or reject, and 90 percent of the time I just get the files and I look at the position and I check it off and go on, unless it's something that I know something about or care a great deal about. I just trust the staff to handle it, so I would have no idea why she was recommended or why she was appointed.

Q. Well, you would not check off someone's name approving the appointment if you had some reason to question the trustworthiness of the individual, would you?

A. No.

Q. And to your own knowledge, did Kathleen Willey have a reputation while working in the White House with respect to her character for truthfulness?

A. No. I only know, the only thing that, the only conversation I ever had with her that amounted to anything was this conversation which lasted about 10 minutes, maybe a little more, and I didn't doubt that she was telling the truth about what she was talking about, but I didn't know her well enough to draw a final conclusion about whether she was generally truthful or not.

Q. Was that the first conversation that you ever had with her?

A. I think it was the first – I mean I had talked to her in passing, you know. She was, as I said, she was in Virginia when I was there in the campaign, and I'd had conversations with her, but that's the first time I'd ever actually sat and talked with her, to the best of my knowledge. She was around when we did the presidential debate in Richmond. She was around that, you know, working in that, and I would talk to her, and she was always very friendly and very nice, but that

conversation, I remember this conversation very vividly because she was so agitated and she seemed to be in very difficult straits.

Q. But you don't remember any earlier conversation other than just casual conversation?

A. Yeah, I'm sure I had casual conversation with her. I knew who she was and she was always there when we were there in Virginia.

Arkansas Sexual Harassment Policy

Q. Let me hand you what has been marked Deposition Exhibit 5.

MR. FISHER: I'm afraid I only have one extra copy of this one, but if you'll send it back to me, you can look at that copy.

MR. BENNETT: Do you have a copy for the Judge?

MR. FISHER: No, but I'll send that one down after I ask only one or two questions. If you have an objection so that she needs to see it, I'll pass that down.

MR. BENNETT: I could make a suggestions. If you have a series of documents you're going to be questioning about, out of courtesy to the other lawyers and the Court, I would be happy to take those and reproduce them so there's enough copies for everyone.

MR. FISHER: I think there are only one or two letters for which I only have one copy.

JUDGE WRIGHT: Why don't we take him up on his offer and make a copy for the Court and one for Mr. Ruff and I'd, I don't know who else. Mr. Bristow might like to have a copy.

MR. BENNETT: Could you give me, maybe you could go on to another area or some direct questions to the president, and give me everything that you want copied, and I'll have several copies made.

JUDGE WRIGHT: Actually you can give them to Barry Ward, if you don't want Mr. Bennett to see them until you present them, and so you don't mind if Barry takes them?

MR. BENNETT: No, Your Honor, I'm just trying to expedite things.

JUDGE WRIGHT: Sure.

MR. FISHER: The things that I have only one copy of are things that were produced just in the last day or so, and with travel arrangements here and everything, I had a hard time coordinating that.

THE WITNESS: I know what this document is.

MR. BENNETT: Wait until he asks you a question.

MR. FISHER: At the next break I'll do that.

JUDGE WRIGHT: All right.

MR. BENNETT: Okay, fine. Okay. What's your question to the president?

MR. FISHER: Did you have an objection about this particular –

MR. BENNETT: No, I don't have an objection.

Q. Is this a copy of a sexual harrassment policy that you signed when you were the governor of the state of Arkansas?

A. It is. I signed it in 1987, and I'm fairly sure that I was, we were the first or one of the very first states to actually have a clearly defined sexual harassment policy.

MR. FISHER: Objection, nonresponsive beginning with the words, "I'm fairly sure."

Q. Mr. President, the criteria there under Roman numeral III were actually federal guidelines that you were adopting as the policy in the state, correct?

A. Yes.

MR. BENNETT: Well, Mr. President, read, if he's going to ask you about little pieces of that, read the document, please.

A. Roman numeral III, it says that the criteria as specified by the federal guidelines is, so assuming that, that the staff person I had do this up accurately, that's correct.

Q. And after you became president, did you ever come to believe that the federal guidelines were any different after you became president than they were at the time you signed this policy?

MR. [Bill] BRISTOW [attorney for Clinton co-defendant Danny Ferguson]: Your Honor, I'm going to object to this. Is this a question of law, is this like a, some sort of law school exam? It's supposed to be to find factual evidence or factual evidence that will lead to the discovery of other relevant factual evidence. To ask this witness, even though he is a lawyer, do you think that the federal guidelines or the federal law is the same as this state law, that's unfair. I object.

JUDGE WRIGHT: Overruled. The president has testified that he signed this, he was familiar with it, and the case concerns alleged activity when he was governor, and this is a cause of action under Section 1983 and 1985 and that is state action, and I think it is relevant what the governor knew about the state's sexual harassment policy, or it could be relevant.

MR. BRISTOW: I'm not objecting to the question about the sexual harassment policy. I understood the question to be that he wants to compare present federal law with the state law that was in Arkansas when he was governor, and I think that is an academic exercise. It's not a discovery issue.

JUDGE WRIGHT: I misunderstood the question, then.

MR. BENNETT: Your Honor, my view of this is, if Mr. Fisher wants to use his time with the president of the United States to ask these kinds of questions, I personally have no objection. But at three o'clock, I don't want to hear that we have ten major integral areas that you haven't gone into.

JUDGE WRIGHT: All right, Mr., Mr. Fisher, state the question again. I just, I misunderstood it, apparently.

MR. FISHER: The question, Your Honor, is whether he ever came to the understanding that any of these guidelines had changed.

JUDGE WRIGHT: Well, you may ask, go ahead.

A. I don't think that question every crossed my mind one way or the other. I have no knowledge of, that there has been any change in the federal law. If there has been, if there hasn't been, I have no knowledge of that.

Regarding Monica S. Lewinsky

Q. Now, do you know a woman named Monica Lewinsky?

A. I do.

Q. How do you know her?

A. She worked in the White House for a while, first as an intern, and then in, as the, in the legislative affairs office.

Q. She began -- excuse me.

A. So that's how I know her.

Q. Excuse me for interrupting you, sir. Did she begin to work as an intern in the White House in the summer of 1995?

A. I don't know when she started working at the White House.

Q. Do you recall when you met her for the first time?

A. It would be sometime, I'd think, in later 1995.

Q. She began to work in the White House office of legislative affairs around December of 1995, correct?

A. I have no idea.

Q. Do you know how she obtained that job?

A. No.

Q. Did you ever talk to anyone about finding a job for Monica Lewinsky?

A. When she got the job in the legislative affairs office? No.

Q. Before she got that job.

A. No.

Q. Did you ever talk to anyone about the possibility of her obtaining a job in the White House?

A. She, she came there as an intern, and as several of them have, she applied for some job there apparently and got the job. I was not involved in her moving from being an intern to being a full-time employee. I had no involvement in that whatever.

Q. And you never talked to anyone about that?

A. No, I did not.

Q. In April of 1996 she was offered and she accepted a job as assistant to the assistant secretary for public affair at the U.S. Department of Defense; is that correct?

A. I don't know when she went over there.

Q. Is it correct that she did accept that job at some point?

A. I don's know what her specific job was. I know that she moved over to the Department of Defense.

Q. And worked at the Pentagon, correct?

A. Well, she worked for the Department of Defense. I think that's where all their officer are in Washington.

Q. Is it true that when she worked at the White House she met with you several times?

A. I don't know about several times. There was a period when the, when the Republican Congress shut the government down that the whole White House was being run by interns, and she was assigned to work back in the chief of staff's office, and we were all working there, and so I saw her on two or three occasions then, and then when she worked at the White House, I think there was one or two other times when she brought some documents to me.

Q. Well, you also saw here at a number of social functions at the White House, didn't you?

A. Could you be specific? I'm not sure. I mean when we had, when we had like big staff things for, if I had a, like in the summertime, if I had a birthday party and the whole White House staff came, then she must have been there. If we had a Christmas party and the whole White House staff was invited, she must have been there. I don't remember any specific social occasions at the White House, but people who work there when they're invited to these things normally come. It's a – they work long hours, it's hard work, and it's one of the nice things about being able to work there, so I assume she was there, but I don't have any specific recollection of any social events.

JUDGE WRIGHT: I want to interrupt because I want a break. I also wanted to ask about the luncheon break. We're not, we're not too far from 12. I personally don't care when we take it, but has Skadden lawyers arranged for lunch to be brought up to us?

MR. BENNETT: I've arranged for lunch, Your Honor. We can have it – I don't know if it's there right now. We were thinking 12:30, but whatever –

JUDGE WRIGHT: That's great. That's perfect.

MR. BENNETT: And we have a room set aside for you and your law clerk where you can eat privately, and we have a separate room for their side of the table, and our side.

JUDGE WRIGHT: All right, let's take a 10-minute break.

(Short recess)

Q. Mr. President, before the break, we were talking about Monica Lewinsky. At any time were you and Monica Lewinsky alone together in the Oval Office?

A. I don't recall, but as I said, when she worked at the legislative affairs office, they always had somebody there on the weekends. I typically worked some on the weekends. Sometimes they'd bring me things on the weekends. She – it seems to me she brought things to me once or twice on the weekends. In that case, whatever time she would be in there, drop it off, exchange a few words and go, she was there. I don't have any specific recollections of what the issues were, what was going on, but when the Congress is there, we're working all the time, and typically I would do some work on one of the days of the weekends in the afternoon.

Q. So I understand, your testimony is that it was possible, then, that you were alone with her, but you have no specific recollection of that ever happening?

A. Yes, that's correct. It's possible that she, in, while she was working there, brought something to me and that at the time she brought it to me, she was the only person there. That's possible.

Q. Did it ever happen that you and she went down the hallway from the Oval Office to the private kitchen?

MR. BENNETT: Your Honor, excuse me, Mr. President, I need some guidance from the Court at this point. I'm going to object to the innuendo. I'm afraid, as I say, that this will leak. I don't question the predicates here. I question the good faith of counsel, the innuendo in the question. Counsel is fully aware that Ms. Jane Doe 6 has filed, has an affidavit which they are in possession of saying that there is absolutely no sex of any kind in any manner, shape or form, with President Clinton, and yet listening to the innuendo in the questions –

JUDGE WRIGHT: No, just a minute, let me make my ruling. I do not know whether counsel is basing this question an any affidavit, but I will direct Mr. Bennett not to comment on other evidence that might be pertinent and could be arguably coaching the witness at this

juncture. Now, I, Mr. Fisher is an officer of this court, and I have to assume that he has a good faith basis for asking the question. If in fact he has no good faith basis for asking this question, he could later be sanctioned. If you would like, I will be happy to review in camera any good faith basis he might have.

MR. BENNETT: Well, Your Honor, with all due respect, I would like to know the proffer. I'm not coaching the witness. In preparation of the witness for this deposition, the witness is fully aware of Ms. Jane Doe 6's affidavit, so I have not told him a single thing he doesn't know, but I think when he asks questions like this where he's sitting on an affidavit from the witness, he should at least have a good faith proffer.

JUDGE WRIGHT: Now, I agree with you that he needs to have a good faith basis for asking the question.

MR. BENNETT: May we ask what it is, Your Honor?

JUDGE WRIGHT: And I'm assuming that he does, and I will be willing to review this in camera if he does not want to reveal it to counsel.

MR. BENNETT: Fine.

MR. FISHER: I would welcome an opportunity to explain to the Court what our good faith basis is in an in camera hearing.

JUDGE WRIGHT: All right.

MR. FISHER: I would prefer that we not take the time to do that now, but I can tell the Court I am very confident there is substantial basis.

JUDGE WRIGHT: All right, I'm going to permit the question. He's an officer of the Court, and as you know, Mr. Bennett, this Court has ruled on prior occasions that a good faith basis can exist notwithstanding the testimony of the witness, of the deponent, and the other party.

MR. BENNETT: Yes, Your Honor, but you understand, and I'm not arguing with you what my concern is, Your Honor, I wouldn't have any trouble with that if I knew that this deposition would be kept under seal. But when he mentions names, when he knows, or at least, you know, hearsay, hearsay, hearsay about something, they check it out, they get an affidavit from the woman, they ask these questions, and the Washington Times will have her name on the front page tomorrow or the day after.

JUDGE WRIGHT: As you know, I'm extremely sympathetic with your position, however this is a discovery deposition.

MR. BENNETT: I understand. That's all right, Your Honor. I'm sorry.

JUDGE WRIGHT: Go ahead.

MR. FISHER: Thank you, Your Honor.

THE WITNESS: What was your question again, sir?

MR. FISHER: I've forgotten, Mr. President, I'm sorry.

JUDGE WRIGHT: Something about Ms. Jane Doe 6 in the hallway.

Q. Do you recall ever walking with Jane Doe 6 Lewinsky down the hallway from the Oval Office to your private kitchen there in the White House?

A. Well, let me try to describe the facts first, because you keep talking about this private kitchen. The private kitchen is staffed by two naval aides. They have total, unrestricted access to my dining room, to that hallway, to coming into the Oval Office. The people who are in the outer office of the Oval Office can also enter at any time.

I was, after I went through a presidential campaign in which the far right tried to convince the American people I had committed murder, run drugs, slept in my mother's bed with four prostitutes, and done numerous other things, I had a high level of paranoia.

There are no curtains on the Oval Office, there are no curtains on my private office, there are no curtains or blinds that can close the windows in my private dining room. The naval aides come and go at will. There is a peephole on the office that George Stephanopoulos first and then Rahm Emanuel occupied that looks back down that corridor. I have done everything I could to avoid the kind of questions you are asking me here today, so to talk about this kitchen as if it is a private kitchen, it's a little cubbyhole, and these guys keep the door open. They come and go at will. Now that's the factual background here.

Now, to go back to your question, my recollection is that, that at some point during the government shutdown, when Ms. Lewinsky was still an intern but was working the chief staff's office because all the employees had to go home, that she was back there with a pizza that she brought to me and to others. I do not believe she was there alone, however. I don't think she was. And my recollection is that on a couple of occasions after that she was there but my secretary Betty Currie was there with her. She and Betty are friends. That's my, that's my recollection. And I have no other recollection of that.

MR. FISHER: While I appreciate all of that information, for the record I'm going to object. It's nonresponsive as to the entire answer up to the point where the deponent said, "Now back to your question."

Q. At any time were you and Monica Lewinsky alone in the hallway between the Oval Office and this kitchen area?

A. I don't believe so, unless we were walking back to the back dining room with the pizzas. I just, I don't remember. I don't believe we were alone in the hallway, no.

Q. Are there doors at both ends of the hallway?

A. They are, and they're always open.

Q. At any time have you and Monica Lewinsky ever been alone together in any room in the White House?

A. I think I testified to that earlier. I think that there is a, it is – I have no specific recollection, but it seems to me that she was on duty on a couple of occasions working for the legislative affairs office and brought me some things to sign, something on the weekend. That's – I have a general memory of that.

Q. Do you remember anything that was said in any of those meetings?

A. No. You know, we just have conversation, I don't remember.

Q. How long has Betty Currie been your secretary?

A. Since I've been president.

Q. Did she also work with you in Arkansas?

A. Not when I was governor. She worked in the transition. She worked for Warren Christopher in the transition, and then she came to work for me.

Q. How is her work schedule arranged? Does she have a certain shift that she works. or do you ask her to work certain hours the following day? Please explain how her schedule is determined.

A. She works, she comes to work early in the morning and normally stays there until I leave at night. She works very long hours, and then when I come in on the weekend, or on Saturday, if I work on Saturday, she's there, and normally if I'm, if I'm working on Sunday and I'm having a schedule of meetings, either she or Nancy Hernreich will be there. One of them is always there on the weekend. Sometimes if I come over just with paperwork and work for a couple of hours, she's not there, but otherwise she's always there when I'm there.

Q. Are there any other individuals who are specifically assigned to be your secretary?

A. No, just Betty. Betty and Nancy Hernreich basically runs the outer office for me. They are my two major assistants, and of course, and there are a couple of other people who work with them, Janice Kearney who keeps my, in effect, diary now of what's going on, who's been – she's been doing that maybe a. . .

Pages 61 to 64 missing

A. I don't know.

Q. Have you ever met with Monica Lewinsky in the White House between the hours of midnight and six a.m.?

A. I certainly don't think so.

Q. Have you ever met –

A. Now, let me just say, when she was working there, during, there may have been a time when we were all – we were up working late. There are lots of, on any given night, when the Congress is in session, there are always several people around until late in the night, but I don't have any memory of that. I just can't say that there could have been a time when that occurred, I just – but I don't remember it.

Q. Certainly if it happened, nothing remarkable would have occurred?

A. No, nothing remarkable. I don't remember it.

Q. It would be extraordinary, wouldn't it, for Betty Currie to be in the White House between midnight and six a.m., wouldn't it?

A. I don't know what the facts were. I mean I don't know. She's an extraordinary woman.

Q. Does that happen all the time, sir, or rarely?

A. Well, I don't know, because normally I'm not there between midnight and six, so I wouldn't know how many times she's there. Those are questions you'd have to ask her. I just can't say.

Q. Has it ever happened that a White House record was created that showed the Monica Lewinsky was meeting with Betty Currie when in fact Monica Lewinsky was meeting with you?

MR. BENNETT: No, Your Honor, I'm going to certainly let the president answer that, but I object to the form of the question because it assumes facts not in evidence, and I again question their good faith in this line of questioning.

JUDGE WRIGHT: I overrule the objection. I will permit it. The nature of many of the responses has been he doesn't recall or he doesn't know, and so he has not outright denied it. This is discovery and I'll permit the question. Go ahead.

A. Would you repeat the question?

Q. Yes sir. Has it ever happened that a White House record was created that reflected that Betty Currie was meeting with Monica Lewinsky when in fact you were meeting with Monica Lewinsky?

A. Not to my knowledge.

Q. Are there records created of your meetings with people in the White House?

A. I believe we have a record of the people that, that see me. We have – I think there's a record of everybody that comes in and out of the White House. Of course the people who work there and have permission to be there can come in and out and move in and out of the offices, and I don't know if there are records of all those meetings or not. For example there are several of my staff people I see many times a day, and I have no idea whether there's a record of every time

I see those people.

Q. All right, sir, and I appreciate that, but just to be precise I'm not asking about records of everyone coming into the White House, but I'm asking specifically about records of meetings with you.

A. The answer to that is I don't know. I mean I, Rahm Emanuel comes through that back door into the kitchen and the hallway you talked about three or four times a day, unannounced, unscheduled, sometimes at night, sometimes in the daytime. I have no idea if there's a record of every time he comes to see me. I have no idea if there's a record of every time John Podesta comes down the hall and sticks his head in and talks to me about something. I simply don't know. I don't know the answer to your question.

Q. You suspect, don't you, that there are at least some meetings that you have for which there's no written record made, correct?

A. I don't know the answer to that. They keep a pretty good record of everything I do, I think.

Q. When was the last time you spoke with Monica Lewinsky?

A. I'm trying to remember. Probably sometime before Christmas. She came by to see Betty sometime before Christmas. And she was there talking to her, and I stuck my head out, said hello to her.

Q. Stuck your head out of the Oval Office?

A. Uh-huh, Betty said she was coming by and talked to her, and I said hello to her.

Q. Was that shortly before Christmas or –

A. I'm sorry, I don't remember. Been sometime in December, I think, and I believe – that may not be the last time. I think she came to one of the, one of the Christmas parties.

Q. Did she tell you she had been served with a subpoena in this case?

A. No. I don't know if she had been.

Q. Did anyone other than your attorneys ever tell you that Monica Lewinsky had been served with a subpoena in this case?

A. I don't think so.

Q. Did you ever talk with Monica Lewinsky about the possibility that she might be asked to testify in this case?

A. Bruce Lindsey, I think Bruce Lindsey told me that she was, I think maybe that's the first person told me she was. I want to be as accurate as I can.

MR. BENNETT: Keep your voice up Mr. President.

THE WITNESS: Okay.

A. But he may not have. I don't have a specific memory, but I talked with him about the case on more than one occasion, so he might have said that.

Q. Did he tell you that on the phone or in person?

A. I don't know. I talk to him and see him several times a day, so I don't know. I would have no way of remembering that.

Q. Did you talk to Mr. Lindsey about what action, if any, should be taken as a result of her being served with a subpoena?

A. No.

Q. I believe I was starting to ask you a question a moment ago and we got sidetracked. Have you ever talked to Monica Lewinsky about the possibility that she might be asked to testify in this lawsuit?

A. I'm not sure, and let me tell you why I'm not sure. It seems to me the, the, the -- I want to be as accurate as I can here. Seems to me the last time she was there to see Betty before Christmas we were joking about how you-all, with the help of the Rutherford Institute, were going to call every woman I'd ever talked to, and I said, you know --

MR. BENNETT: We can't hear you, Mr. President.

A. And I said that you-all might call every woman I ever talked to and ask them that, and so I said you would qualify, or something like that. I don't, I don't think we ever had more of a conversation than that about it, but I might have mentioned something to her about it, because when I saw how long the witness list was, or I heard about it, before I saw, but actually by the time I saw it her name was in it, but I think that was after all this had happened. I might have said something like that, so I don't want to say for sure I didn't, because I might have said something like that.

Q. Was anyone else present when you said something like that?

A. Betty, Betty was present, for sure. Somebody else might have been there, too, but I said that to a lot of people. I mean that was just something I said.

Q. What, if anything, did Monica Lewinsky say in response?

A. Nothing that I can remember. Whatever she said, I don't remember. Probably just some predictable thing.

Q. Recently you took a trip that included a visit to Bosnia, correct?

A. That's correct.

Q. While you were on that trip, did you talk to Monica Lewinsky?

A. I don't believe she was on that trip.

Q. Did you talk to her on the telephone?

A. No.

Q. While you were on that trip, did you ask anyone to talk to her?

A. I don't believe so, no. Can you be more specific? I don't have any idea. I don't think so, no.

Q. While you were on that trip, did you ask anyone to meet with her?

A. Not to my knowledge.

Q. Excluding conversations that you may have had with Mr. Bennett or any of your attorneys in this case, within the past two weeks has anyone reported to you that they had had a conversation with Monica Lewinsky concerning this lawsuit?

A. I don't believe so. I'm sorry, I just don't believe so.

Q. You know a man named Vernon Jordan?

A. I know him well.

Q. You've known him for a long time.

A. A long time.

Q. Has it ever been reported to you that he met with Monica Lewinsky and talked about this case?

A. I knew that he met with her. I think Betty suggested that he meet with her. Anyway, he met with her. I, I thought that he talked to her about something else. I didn't know that – I thought he had given her some advice about her move to New York. Seems like that's what Betty said.

Q. So Betty, Betty Currie suggested that Vernon Jordan meet with Monica Lewinsky?

A. I don't know that.

Q. I thought you just said that. I'm sorry.

A. No, I think, I think, I think Betty told me that Vernon talked to her, but I, but my impression was that Vernon was talking to her about her moving to New York. I think that's what Betty said to me.

Q. What do you know about her moving to New York?

A. Just that.

Q. Is she going to move to New York?

A. I don't know. She may have already moved to New York. I don't know. My understanding was that her mother moved to New York and that she was going to move to New York and that she was looking for some advice about what she should do when she got there.

Q. Is it your understanding that she was offered a job at the U.N.?

A. I know that she interviewed for one. I don't know if she was offered one or not.

Q. Have You ever talked to Bill Richardson about Monica Lewinsky?

A. No.

Q. What's his title?

A. He's the ambassador to the U.N.

JUDGE WRIGHT: I'm sorry, I didn't hear that.

THE WITNESS: He's the ambassador to the U.N.

Q. Have you ever asked anyone to talk to Bill Richardson about Monica Lewinsky?

A. I believe that, I believe that Monica, what I know about that is I believe Monica asked Betty Currie to ask someone to talk to him, and she, and she talked to him and went to an interview with him. That's what I believe happened.

Q. And the source of that information is who?

A. Betty. I think that's what Betty – I think Betty did that. I think Monica talked to Betty about moving to New York, and I, my recollection is that that was the chain of events.

Q. Did you say or do anything whatsoever to create a possibility of Monica Lewinsky getting a job at the U.N.?

A. To my knowledge, no, although I must say I wouldn't have thought there was anything wrong with it. You know, she was a – she had worked in the White House, she had worked in the Defense Department, and she was moving to New York. She was a friend of Betty. I certainly wouldn't have been opposed to it, based on anything I knew, anyway.

Q. Well, have you ever given any gifts to Monica Lewinsky?

A. I don't recall. Do you know what they were?

Q. A hat pin?

A. I don't, I don't remember. But I certainly, I could have.

Q. A book about Walt Whitman?

A. I give – let me just say, I give people a lot of gifts, and when people are around I give a lot of things I have at the White House away, so I could have given her a gift, but I don't remember a specific gift.

Q. Do you remember giving her a gold brooch?

A. No.

Q. Do you remember giving her an item that had been purchased from The Black Dog store at Martha's Vineyard?

A. I do remember that, because when I went on vacation, Betty said that, asked me if I was going to bring some stuff back from The Black Dog, and she said Monica loved, liked that stuff and would like to have a piece of it, and I did a lot of Christmas shopping from The Black Dog, and I bought a lot of things for a lot of people, and I gave Betty a couple of the pieces, and she gave I think something to Monica and something to some of the other girls who worked in the office. I remember that because Betty mentioned it to me.

Q. What in particular was given to Monica?

A. I don't remember. I got a whole bag full of things that I bought at The Black Dog. I went there, they gave me some things, and I went and purchased a lot at their store, and when I came back I gave a, a big block of it to Betty, and I don't know what she did with it all or who got what.

Q. But while you were in the store you did pick out something for Monica, correct?

A. While I was in the store – first of all, The Black Dog sent me a selection of things. Then I went to the store and I bought some other things, t-shirts, sweatshirts, shirts. Then when I got back home, I took out a thing or two that I wanted to keep, and I took out a thing or two I wanted to give to some other people, and I gave the rest of it to Betty and she distributed it. That's what I remember doing.

Q. Has Monica Lewinsky ever given you any gifts?

A. Once or twice. I think she's given me a book or two.

Q. Did she give you a silver cigar box?

A. No.

Q. Did she give you a tie?

A. Yes, she had given me a tie before. I believe that's right. Now, as I said, let me remind you, normally, when I get these ties, I get ties, you know, together, and they're given to me later, but I believe that she has given me a tie.

Q. Well, Mr. President, it's my understanding that Monica Lewinsky has made statements to people, and I'd like for you –

MR. BRISTOW: Object, object to the form of the question. Counsel shouldn't testify, and when you start out like that, it's obviously counsel testifying. I don't think that's proper.

MR. BENNETT: Let me add to that, Your Honor wouldn't permit me to make reference to this affidavit, and I respect your ruling.

JUDGE WRIGHT: Let me, let me just make my ruling. It is not

appropriate for counsel to make comments about, about these thing. I don't know whether he was trying to do this to establish a good fai basis for the next question or not, but it is inappropriate for counsel to comment, so I will sustain the objection.

MR. FISHER: I understand.

Q. Did you have an extramarital sexual affair with Monica Lewinsky?

A. No.

Q. If she told someone that she had a sexual affair with you beginning in November of 1995, would that be a lie?

A. It's certainly not the truth. It would not be the truth.

Q. I think I used the term "sexual affair." And so the record is completely clear, have you ever had sexual relations with Monica Lewinsky, as that term is defined in Deposition Exhibit 1, as modified by the Court.

MR. BENNETT: I object because I don't know that he can remember.

JUDGE WRIGHT: Well, it's real short. He can – I will permit the question and you may show the witness definition number one.

A. I have never had sexual relations with Monica Lewinsky. I've never had an affair with her.

Q. Have you ever had a conversation with Vernon Jordan in which Monica Lewinsky was mentioned?

A. I have. He told me that he called – he mentioned in passing to me that he had talked to her, and she had come to him for advice about moving to New York.

Q. She had come to him for advice?

A. Uh-huh. She'd come to him for advice about moving to New York. She had called him and asked if she could come see him, and Betty I think had maybe said something to him about talking to her, and he had given her some advice about moving to New York. That's all I know about that.

Q. Where were you when you had this conversation with Vernon Jordan.

A. I don't have any idea. I talk to Vernon Jordan a lot.

Q. Do you recall whether it was on the phone or in person?

A. No.

Q. What did he say that she had said to him in response?

A. He just said she seemed like a bright, energetic young woman and

she had certain interests, and he made some suggestions to her and suggested where she ought to go for interviews. That's all I know about that.

Q. Did you express any approval or disapproval of anything Mr. Jordan had done?

MR. BENNETT: I object. I don't know what that means, Your Honor. That's awfully vague and ambiguous. Could you be more specific?

MR. FISHER: Sure.

Q. At the time that you talked to Vernon Jordan about his conversation with Monica Lewinsky concerning her possible move to New York, did you express any approval or disapproval?

A. I don't remember. I think he was just reporting on the meeting to me. There'd be no reason that I would have disapproved it. She was a young woman who'd worked in the White House and had gone to work in the Defense Department and was moving to New York. I would not have though there was anything wrong with that, with us trying to help her.

Q. Is it your testimony that you had nothing whatsoever to do with causing that conversation to take place between Monica Lewinsky and Vernon Jordan?

MR. BENNETT: I object. That, that misstates the testimony.

MR. FISHER: I'm asking what his testimony is.

MR. BENNETT: Anything to do, I think he's testified, Your Honor. If he want to ask more questions, that's all right, but – **JUDGE WRIGHT:** I will – you might rephrase the question and ask whether he ever intended to facilitate the conversation or took any action to help Ms. Lewinsky gain access to Vernon Jordan for this purpose, or for any purpose. You might ask that. The president has testified on this matter that he doesn't think it would be improper if he had, so go ahead, you can ask.

Q. Did you do anything, sir, to prompt this conversation to take place between Vernon Jordan and Monica Lewinsky?

A. I can tell you what my memory is. My memory is that Vernon said something to me about her coming in, Betty had called and asked if he would see her and he said she would, he said he would, and then she called him and then he said something to me about it. I'm sure if he said something to me about it I said something positive about it. I wouldn't have said anything negative about it. I didn't have any negative knowledge. I mean there would be no reason for me to be negative about it. Vernon liked to help people. He was always trying to help people.

Q. My question, though, is focused on the time before the conversation occurred, and the question is whether you did anything to cause the conversation to occur.

A. I think in the mean – I'm not sure how you mean the question. I think the way you mean the question, the answer to that is no, I've already testified. What my memory of this is, if you're asking did I set the meeting up, I do not believe that I did. I believe that Betty did that, and she may have mentioned, asked me if I thought it was all right if she did it, and if she did ask me I would have said yes, and so if that happened, then I did something to cause the conversation to occur. If that's what you mean, yes. I didn't think there was anything wrong with it. It seemed like a natural think to do to me. But I don't believe that I actually was the precipitating force. I think that she and Betty were close, and I think Betty did it. That's my memory of it.

Q. Have you ever had a conversation with Vernon Jordan in which Paula Jones was mentioned?

A. I'm sure I have. I don't remember what it would have been, but I'm sure I have. I mean after all this time, I'm sure I have.

MR. BRISTOW: Your Honor, I just think we should note for the record that it is now almost 12:30, and to my knowledge this is the first moment in the deposition that the word "Paula Jones" has been mentioned.

JUDGE WRIGHT: Are you suggesting we take a break?

MR. BRISTOW: I think it's a good time for a break, but I'm also thinking of the fact that we do have some time constraints and – but anyway, I just thought it was an appropriate thing to note.

MR. BENNETT: Your Honor, I hope the sandwiches are there, but I'm happy to break now, but I'd like to get some guidance from the Court on something. If at the completion of, as he has apparently just completed Miss Lewinsky.

MR. FISHER: No, I haven't, but go ahead.

MR. BENNETT: Oh, I'm sorry, well, I'll wait until you finish with Miss Lewinsky.

MR. FISHER: I have just a couple of other things.

MR. BENNETT: I can ask my generic question. Hypothetically, Your Honor, if I have affidavits of women that he's questioning the president about and Your Honor does not want me to emphasize or even mention it for fear of the witness, when they are, when he is finished at the end of the day, may I read to the president certain relevant portions of those affidavits that we have an ask the president if that's, as far as he knows, a true and accurate statement?

JUDGE WRIGHT: You may, because this is that type of deposition.

MR. BENNETT: Thank you.

JUDGE WRIGHT: And I realize that you want to make your record because you're fearful about what might take place.

MR. BENNETT: Thank you, Your Honor, thank you, Your Honor.

JUDGE WRIGHT: Would you like to finish these questions now before we break?

MR. FISHER: I have just a couple more on this particular subject.

JUDGE WRIGHT: All right, all right, let's proceed then.

Q. Mr. President, have you ever paid any money to Monica Lewinsky?

A. No, sir.

Q. Have you ever caused money to be paid to her?

A. Absolutely not.

Q. Have you ever paid off any debt that she owed to some other person?

A. No, sir.

Q. Have you ever caused a debt that she owed to some other person to be repaid?

A. No, sir.

MR. FISHER: That's all I have on that subject.

JUDGE WRIGHT: All right, how much time – I'm suggesting we have lunch for, within the next half-hour and then come back here in half an hour.

MR. BENNETT: Would you like to break now –

THE WITNESS: Mr. Fisher, is there something , let me just – you asked that with such conviction and I answered with such conviction, is there something you want to ask me about this? I don't, I don't even know what you're talking about, I don't think.

MR. FISHER: Sir, I think this will come to light shortly. .d you'll understand.

MR. BENNETT: Your Honor, we've had an awful lot of innuendo, and I object to it, and if they have it, let's get to it.

JUDGE WRIGHT: Well, I'm not – we're going to have a break for lunch for a half an hour. I will use this time for Counsel for Ms. Jones to provide me with anything in camera that they might like to with respect to a good faith basis for some of the questions to which Counsel have objected. Again, this is discovery, we're not applying the Rules of Evidence. There must be a good faith basis for the questions, and I have not seen any of the deposition, I mean, excuse me, any of the affidavits to which you're referring. I had not even heard of some of these individuals until Monday when we met to discuss the – and I hate this word – the parameters of the deposition, and so if you would please provide me with an in camera document or document or documents, or you can just tell me in camera off the

record what your good faith basis is, then I can rule.

MR. CAMPBELL: Will we do that in your room Judge, here?

JUDGE WRIGHT: You can do that in my room, yeah, it doesn't matter.

MR. BENNETT: Your Honor, that's fine with me. I have no objection to that, but since Your Honor has ruled that I will be permitted to do that, I don't feel that's necessary, and withdraw my request that they do that. What I was worried about is that a record would be finished and we'd just have a lot on innuendo, so I think as long as I'm permitted to do that, then I think it would be –

JUDGE WRIGHT: You may. And keep in mind, also, I don't know just for what purpose this deposition will be used. It's certainly a discovery deposition, that's the initial purpose. It's clear that because the Defendant is the president, and because this Court has actually enormous discretion with respect to the conduct of this case with respect to the Defendant, it would be possible that this might even be used for evidentiary purposes if Mr. Clinton can't be present to testify, and that is another reason I will permit Mr. Bennett to rehabilitate the witness or put anything else on the record that you might think would be appropriate.

MR. BENNETT: That being the case, Your Honor, I would ask that they not meet with you privately. I would never have the ability to question or challenge that. I thought that was a possible solution to a problem where I knew nothing and you might have the opportunity to rule something out, but since you've given me the leeway, it would then be my view that since you are the trial judge that there not be ex parte discussions on evidence, and it was my suggestion, and I, and I admit to that, but given what you just said, I think this is a better way to handle it.

JUDGE WRIGHT: I'd like to give Counsel the benefit of the doubt, and even though I do have very grave concerns about the leak of information under seal in this matter, I can't tie it directly to any Counsel of Ms. Jones, and I have to, I don't believe any of the Counsel here are responsible for these leaks, and if I had reason to believe so, I would take appropriate action.

MR. BENNETT: I would suggest that on Monday you might have more of a factual basis since, since the Rader firm is apparently doing the circuit here in Washington.

MR. CAMPBELL: Your Honor, we object to that side-bar.

JUDGE WRIGHT: Again, we have to assume that all Counsel are playing by the rules set by the Court and until that time, until it's brought to my attention, otherwise I'll just have to rest on that assumption. Let's take a break.

Pages 89 to 10~~7~~ missing

... down time, that is, if I was waiting between two appearances, or I got there a little early or they were running a little late, and I had something I needed to do, some work I needed to do, there were, over the years, best I can remember, roughly I did, one of three things happened. Either, if I had four or five minutes, I'd just go to the standard pay phones on the second floor of the convention floor and make phone calls. If I had more time, or I needed some desk space or some privacy, sometimes they would give me a little office-like space, or sometimes when conventions were there, they would let me use a, a suite that they had set aside for the convention.

And frequently I remember, when that happened – that didn't happen too many times, five or six times over time, but, you know, there'd be, often be people coming in and out of there, they'd be bringing hors d'oeuvres or something, or people would be coming in and out setting up meetings because they'd set aside for the convention, but it was still nice enough for me, because they always, there was a desk there, and a phone, I could write and make notes, and they never bothered me any when they were coming in and out, so I just didn't, that wasn't – so it is possible that they made available such a space for me, but I do not believe in the whole time I was governor they ever gave me a, a suite that was not already set aside for the use of the convention. At least I wouldn't have known it if they did. That's my belief.

But I was there several time sort of in between times where I had a little drag time and those were the three different things I remember doing during those time. I don't have any specific recollection of what happened on May the 8th, but over a ten year period, that kind of thing happened.

Q. Do you recall ever, at one of the Governor's Quality Conferences, asking a state trooper to make arrangement to have a suite or a room made available to you at the Excelsior Hotel?

A. No.

Q. Do you recall whether any of the Governor's Quality Conferences at the Excelsior Hotel you ever met a woman in a suite or a room other then the room where the conference was taking place?

A. No, I, you know, over the years I met a lot of people at a lot of these meetings. I don't. Let me just say, with regard to your previous question, if, when the Excelsior, if they let me use a room, the trooper went up for it, to the best of my knowledge the only time they ever did that is they had the room set aside already for the use of the convention people, but I don't have any specific recollection of that on May the 8th.

Q. When they did have a room set aside, as you just described, do you recall where in the hotel it was located?

A. Well, they, I don't know that it was the same place. I was – many times I'd be at reception for these convention and they'd, they had them in suites, you know, up near the top of the hotel. I don't know what the room numbers were or where they were on the floors or anything like that.

Q. But do you remember that at least some of them were up on one of the upper levels of the hotel?

A. Yes, I do. I think that's what suites are in the Excelsior. I'm not sure they have them on every floor.

Q. Now, seated to my right two chairs down is Ms. Paula Jones. Do you recall ever having met her before today?

A. No. I've said that many times. I don't.

Q. Do you recall ever having seen her before early 1994 when she first made public her accusations against you?

A. No, I, I actually saw her on television then, just by accident. I just happened to be walking by a television in the office, and I remember I asked Bruce Lindsey to come there. I said Bruce, do we know this lady, who is this person? That was my first surprised reaction.

Q. Before you saw Paula Jones on television, do you have any recollection of ever seeing her before?

A. No, sir, I don't have any memory of it. But you have to remember, I've met well over a hundred thousand people since 1991, maybe over two hundred thousand. Maybe more that that. I don't know.

MR. FISHER: Objection, non-responsive, beginning with the words, "But you have to remember."

Q. Have you ever said to any of the state troopers who were on your security detail when you were governor that any woman had, quote, "that come-hither look," close quote?

A. I might well have done that. That's a phrase I have used. I might well – I don't have a specific recollection of doing it, but it wouldn't surprise me if I'd said that to a trooper.

Q. What does the phrase "that come-hither look" mean?

A. It means either in look or dress a sort of a suggestive appearance from the look or dress.

Q. Sexually suggestive?

A. Yes.

Q. On any of the – strike that.

During any of the Governor's Quality Conferences that you attended, do you recall ever saying to anyone that you needed to go to a suite because you were expecting a call from the White House?

A. No, sir, I don't. I got calls from the White House from time to time. I got other calls. I had other business in Washington from time to time. I took calls in difference places than the governor's office from time to time, but I don't have any specific recollection of it.

Q. Can you think of any reason why you would have received a call

from the White House in May of 1991?

A. I don't remember if I did. First of all, I don't know if I did. If I did, I don't know what it was about. If you're asking me can I think of any reason, there were many issues on which I basically represented the Democrats and sometimes the governor of the whole with the Bush administration. But I, I have no specific recollection. I was one of the senior governors in the country at the time, and I worked with them on a lot of things, and I had people call me all the time, but I don't remember what specific issue was going on then.

Q. You don't have a recollection of receiving a call from the White House when you were at the Excelsior Hotel, correct?

A. No, sir, I don't, I don't remember anything about that.

Regarding the Troopers

Q. Now, Danny Ferguson was a member of your security detail for several years?

A. Yes, he was.

Q. He was guarding your life and the life of your wife and your daughter, correct?

A. He was on the security detail.

Q. And while you were governor and he was working on your security detail, did you ever form any opinion as to his character for truthfulness?

A. While I was governor, I had no reason – I was around him quite frequently, and I thought his work was entirely satisfactory, and there was no – I had nothing happen while I was governor that would cause me to question his truthfulness, if that's what you're asking.

Q. Has your opinion as to Danny Ferguson's character for truthfulness changed?

A. No.

Q. Did you ever ask Danny Ferguson to pick up a gift you were giving to a woman other than your wife or a relative?

A. I don't recall doing that. It's possible that I did. Sometimes if they were going to be out and around, I'd, might ask them to do something like that, but normally I didn't, but I might have done that.

Q. While you were governor, was there a store in Little Rock names Barbara Ann's?

A. Barbara Jean's.

Q. Barbara Jean's?

A. Yes.

Q. Do you recall –

A. Isn't that right?

MR. BENNETT: Barbara Jean's is correct.

THE WITNESS: I think that's right.

MR. BENNETT: But you should no feel a moral obligation to correct his errors.

THE WITNESS: Go ahead. Go ahead.

Q. Do you recall ever sending any of the state troopers who were on your security detail to Barbara Jean's to pick up a gift that you were going to give to a woman other than your wife or a relative?

A. No, sir, I don't, and I don't remember ever giving a gift to anyone other than a member of my family from that store. I knew the woman who owned it, and it's possible that I did, but I don't remember it.

Q. Her name is what? The woman that owned it?

A. Barbara – I don't know.

JUDGE WRIGHT: I'm not here to testify. I believe it's Barbara Baber.

MR. BENNETT: I object. No, I'm just kidding.

A. I think that's right. In other words I had met her so I knew who she was, so I, I guess what, the reason I said that is, I believe I shopped there rarely, but on occasion, over a ten-year period, but I have no recollection of buying a gift for anyone other than a member my family there.

Q. Did you ever send a state trooper who was a member of your security detail to any store to pick up a gift for a woman other than your wife or a relative?

A. I have no specific recollection of doing that. I wouldn't – it's possible that it happened, but I don't remember.

Q. Now, after you took office as president, did you ever have any telephone conversations with Danny Ferguson?

A. Yes, I did.

Q. How many?

A. I'm not sure. I think two or three. I have some noted there, which I know you've been given, but I'm not –

MR. BENNETT: Just answer the question –

A. I'm not sure.

MR. BENNETT: – Mr. President.

Q. Without consulting your notes, do you have any independent recollection of anything that was said in any of those conversations with Danny Ferguson?

A. I sure do.

Q. Okay. What is that recollection.

A. Well, he called me secretary in Little Rock. Linda Dixon, and asked me to call him, and I was afraid, you know, I thought there was something, he had a personal problem. I didn't have any ideas what he wanted to talk to me about.

MR. BENNETT: Mr. President, excuse me, keep your voice up, please, so the Judge hears you.

A. I didn't have any idea what he wanted to talk to me about, and when I called him he wanted to talk to me about the, what have now become famous as the so-called trooper stories to The American Spectator. And he said, he acknowledged either at some point during these conversations that he had been a part of the, at least had met with one or two reporters and a Republican lawyer in Arkansas. He said that the troopers had been offered seven hundred thousand dollars in hundred thousand dollar a year increments for jobs that they would take as soon as they could leave the state police out of the state of Arkansas, plus whatever other money they could earn in books and incomes up to a million dollars if they would trash me. He further said that they were told in no uncertain terms that what they said about me did not have to be true, it's just that two of them had to tell the same sorry, and if three of them told the story they could get it printed anywhere, whether it was true or not.

He then said that the troopers who talked to them, principally Patterson and Perry, obviously didn't know anything, and that basically, I remember very well, he said there's basically two kinds of lies in these stories, there's stuff we just made up out of whole cloth, and he said then there's the stuff that happened that we twisted to make it look as bad as possible. And he said I'm out of here, I'm not going to do this, and I said well, why don't you say it's not true? He said I can't do that, they'll get to me if I do. I don't know what he meant by that. But that's the summary of what he said. And that's consistent with my experience with The American Spectator types over the last six years, and what I was told would happen if I ran for president.

MR. FISHER: Objection, non-responsive beginning with the words –

JUDGE WRIGHT: Let me, I have not been ruling on your objections because this is a deposition, I didn't think you wanted me to rule, you were just making your record, but since I am here, I will say that this is improper for the witness to go on and comment such as he just did. It's also of course improper for you to make comments, so to that extent that objection would have been sustained, and that's all I'm going to say. Go ahead.

Q. Approximately when did the conversation you just described take place?

A. Well, it would have been, at least the first conversation would have been sometime I guess in --- maybe my notes reflect it, I don't really remember, but sometime in mid-1993, late, summertime 1993, maybe something like that. It was before Ms. Jones made her statement, because there was no discussion of her in it.

Q. Now, the testimony you just gave about what Danny Ferguson said, was that relating the content of one conversation, or was that more than –

A. I don't remember. You, you've got the, you've got the notes there, and they will, they probably reflect whether it was one or two or three conversations.

MR. FISHER: Would you mark that please

(EXHIBIT 8 marked.)

Q. Sir, I am handing you what has been marked as Deposition Exhibit 8. Ignoring the fax information at the top of each page, can you identify the typed words on this document as a transcription of your notes of conversations with Danny Ferguson?

A. That's what they appear to be. Have you got a copy of the, my handwritten notes?

Q. I do, but not with me.

A. That's what it appears to me, I don't remember verbatim what's in my handwritten notes.

Q. Did you look at the transcription before your deposition today?

A. I'm not sure that I did, actually, but I helped to prepare it because there were a couple of words that the people who prepared the transcription couldn't read. Or a couple of words I had trouble reading. My handwriting's not very good, but –

Q. Look through Exhibit 8, if you would, sir, and tell me whether you see anything there that looks like it was not what you wrote?

A. No. This is – it looks very much like – what is typed here seems, is reminiscent of what I wrote in my handwriting. I just don't have the handwriting here and can't be for sure.

Q. How many separate calls are reflected in these notes?

MR. BENNETT: Well, excuse me, Your Honor. We have provided the original of the notes, and if Your Honor even looks at this typed transcription all of the words are not clear. I would suggest they show the original notes to the witness or at least provide both to him before they ask questions.

JUDGE WRIGHT: All right, go on and show him the original notes, but the question with respect to the number of conversations is

all right. That's --

A. I believe there were, I believe there were two conversations, although there could have been three, and I honestly don't recall. When I looked at my notes, many, many months later, it appears to me that there were two conversations.

(EXHIBIT 9 marked.)

A. Mr. Ferguson might have a better memory than I do. I don't know what he said about it.

Q. Sir, I'm handing you what has been marked as Deposition Exhibit 9. As you can see it bears the caption of this case and is entitled President Clinton's Responses to the Plaintiff's Third Set of Interrogatories.

A. Yes.

Q. Are your notes attached to the back of this document?

A. Excuse me, let me see. Yes, they are.

Q. Okay. And there are four pages of notes, correct?

A. Yes, that's correct.

Q. These are all in your handwriting?

A. Yes, they are.

Q. Upon examination of these notes, can you tell us how many conversations with Danny Ferguson are reflected here?

A. It – as I said, it appears to me that there are two, but the last – but it is possible, I suppose, that there are three, because I'd had to do a very neat job of enumerating the pages. I believe there are two. I don't know for sure.

Q. Is there any document in your possession that you're aware of that would reveal the date on which each of the conversations took place?

A. Not unless the White House operator or the – not unless we have some White House document that reflected when that, when the call was made. I just don't know if we do, but I know the first one was sometime in the latter half of 1993, and I'm not – and the second one was sometime thereafter, and apparently before the American Spectator story was published.

Q. Who found these notes?

A. I think I had them. I just was sort of scribbling them off and I, and I had them. I put them back somewhere.

Q. Where did you put them?

A. I'm not sure. I think I had them either in a – I'm not sure where they were. I had them put away someplace.

Q. Were they in a file folder?

A. I believe they were.

Q. What was the title or label on the file?

A. I don't think there was a title or label on the file. They were just notes that I made to myself when I was scribbling off in a hurry talking to Danny.

Q. Were there any other documents in the file with these notes?

A. No. I had them separate. These are the only phone conversations I had like this. I gave them to my counsel some time ago, so I just don't remember where I had them at the time I gave them to him.

Q. Where is the file from which the original notes were taken currently located?

A. There wasn't – they were just in a folder. I don't know what happened to the folder. I don't know if they have the folder. I don't know what happened to the folder. There was no file with a name and a big file box or anything. I just put these notes aside.

Q. After you became president, did you have any conversations with Danny Ferguson for which you kept no notes?

A. Not that I recall. I, I believe I ran into him and said hello at the, in Seattle at the, I believe he was with Governor Tucker in Seattle at the Asian Pacific leaders meeting, at least he might have been, whoever was there, whatever troopers were there with him, with the governor, I stopped and said hi to them, but that was it, that was the extent of it, so if he was one of those troopers, then I did say that. I didn't keep a note of that. I don't believe there was any other conversation for which I kept no note. If I did have one, I don't remember it.

Q. On that occasion in Seattle, did you talk to Danny Ferguson about the lawsuit?

A. No, sir. I didn't.

Q. Did you talk to Danny Ferguson about Paula Jones?

A. No. I don't have any recollection of that. I think that was before the Paula Jones matter came out. I believe it was. I don't remember, but I don't, I don't have any recollection of talking to Danny Ferguson about any of this. I think I just said – if he was there I think I just said hello to whatever the security people that were there with the governor.

Q. Did you talk to Danny Ferguson about stories being told by any other state troopers who had been on your security detail?

A. In Seattle?

Q. Yeah.

A. I don't believe so, no sir.

Q. So that possible conversation in Seattle and the conversations reflected in your notes here, which are part of Deposition Exhibit 9, those would be all the conversations you remember having with Danny Ferguson since you became president, correct?

A. To the best of my memory. I would not – but I could well have talked to him another time, I'm just telling you what my memory is. I've had several thousand phone calls. I'm giving you the best of my memory.

Q. Do you recall Danny Ferguson ever telling you that he had given an interview to a reporter with the Los Angeles Times?

A. I recall Danny Ferguson saying that he was, he met with a lawyer and three other troopers, and I don't remember whether he said that the reporters were there or not. You see that there's an L.A. Times reporter mentioned in the second phone call there. I don't know if I can tell from the notes whether he actually met with him or not.

Q. Which page of the notes are you looking at now?

A. Page, third – the first page of the second column.

Q. In the transcription, which of the four pages is that?

A. The third.

Q. Okay, You're talking about the reference to the L.A. Times reporter Bill Remmel (sic)?

A. Yes.

Q. Did Danny Ferguson ever say to you that he, Danny Ferguson, had made untrue statements to the L.A. Times reporter?

A. He said exactly what those notes reflect. And you can draw whatever inference from them you want. He said exactly what those notes reflect. As I, if you look at page one, I said he was hedging on how much he said but clearly shared rumors, made up stuff, talked about how they were angry because I didn't give them jobs.

MR. BENNETT: Keep your voice up, Mr. President.

A. And had some other rumors. He said he and his wife were trying to stop the rumors. He said he went to the first meeting to see what they were doing and he played along with them, that's what he said to me. I said it's not true, he says he knows but he wants to stay out of it. And I'm just, I just wrote down here what he said. Then he said that he was threatened by the – that he felt threatened and under pressure, and then he said that the L.A. Times reporter threatened him. That's all, you know, I have no memory independent of these notes that I took here.

Q. All right. Now, on the first page where you wrote, and I quote, "hedging on how much he said but clearly shared rumors, made stuff up," end quote, did you understand that it was Danny Ferguson who

made stuff up?

A. I understood he said to me that they made stuff up. It was clear to me that he had at least gone to the meeting and at least in silence gone along with whatever was done in the beginning, which he later acknowledged doing, and all I can tell you is what he told me there. He said, he said they were encouraged to be as negative as possible, they were told they didn't have to tell the truth, they were told all they had to do was to get two or more people to agree, and if they got three people to say the same thing, anybody in the world would print it, didn't matter if it was true or not, and there was a lot of money in it for them if they did it, that's what he told me, and then he said he just, he didn't, didn't want to be a part of it, didn't want the money, wanted out, wished it had never happened, but he didn't feel like he could ever contradict anything, which I gather meant that he had participated. That's all I know.

Q. Did he ever tell you that he had talked to a reporter named David Brock?

A. David Brock's name is mentioned here. He never – he wasn't specific with me about what he said to Brock or what he said to Remmel (sic) or what he sat in the room and listened to others say and didn't contradict. He was never specific about that.

Q. Now, Buddy Young was a state trooper who was assigned to your security detail at some point, correct?

A. He was the head of governor's security.

Q. And after you became president, you appointed him to a position in the federal government, correct?

A. He was appointed regional director of the Federal Emergency Management Agency, and most of those regional directorships are presidential appointments, so I assume that was a White House appointment. I'm not positive, but I assume it was. Most regional jobs are with most departments.

Q. Before the appointment, did he ever express an interest to you in receiving a federal job?

A. Yes, he said he could take retirement from the state police, and he was ready to do so, that he'd put in his time and he would like to get out.

Q. Did he say that to you before or after you took office as president?

A. I believe after I – I believe it was before I took office. I was actually surprised. I think Buddy Young was the youngest captain in the state police and a very able office. He probably could have become the commander of the state police.

MR. FISHER: Objection, non-responsive beginning with the words, "I was actually very surprised."

JUDGE WRIGHT: Okay, sustained.

Q. Do you have any notes of any conversations with Buddy Young?

A. No sir, I don't. I don't believe I do. I've attempted to look for any other relevant notes that might be relevant to my Counsel or your request for discovery. I don't find any. I don't believe I do.

Q. Do you have any notes of any conversation with any state trooper other than Danny Ferguson?

MR. BENNETT: About – I mean, objection. It's too broad. I mean, he dealt with state troopers all the time.

JUDGE WRIGHT: Let me clarify this. Are you talking about during his term as president?

MR. FISHER: Let me put a time limitation on that, Your Honor.

JUDGE WRIGHT: All right.

Q. After you became president, do you recall taking notes of any conversation that you may have had with a state trooper other than Danny Ferguson?

A. No.

Q. Have you looked to see whether you have any such notes?

A. I don't think I have any other notes. I've tried to find any notes that would be responsive to your request for production. We've given you some other notes that I have. I don't, I don't think I have anymore. And I have no recollection of taking any.

Q. After you became president, did you ever ask Buddy Young to talk to any of the state troopers who had been on your security detail when you were governor?

A. I, I believe, actually I think I did. No, wait a minute, after I became president?

Q. Yes.

A. Back up. I had a conversation with Buddy Young in which I asked him if he knew anything about this purported – this meeting that Danny Ferguson described with himself and the other three troopers, the two reporters, Cliff Jackson, and another Republican lawyer. I don't recall asking him to speak to any of them. I think I was more interested in asking if he knew anything about it or what it precipitated, and I had a conversation like that.

Q. After that conversation, did Buddy Young ...

129 to 132

Pages [redacted] missing

... husband, was our ambassador to Switzerland, and during that time she undertook some appointment I gave her during, and it may have been a paid appointment, she may have been. If you could ask me a question or give me more information, maybe I could give you a better answer. I'm just not sure whether it was an appointed position

without pay or a paid position.

Q. If I could remember the position, I would do that sir, but it slips my mind at the moment. Did you appoint her to that position?

A. Well, she was appointed during my presidency, and I'm sure under my authority. I don't remember making the decision or, initially, but I'm sire someone recommended it and I went along with it.

Q. Now, have you ever spent the night at a home owned by Jane Doe 7?

A. Yes, I have.

Q. Was that in Jackson Hole, Wyoming?

A. No.

Q. Where was it located?

A. It was located in San Diego, California.

Q. And was that while you were president of the United States?

A. Yes.

Q. Was it before or after her appointment to the position that I can't remember?

A. I don't remember. My family and I actually stayed at her home for several days on vacation a couple years ago. I don't remember whether it was before or after, and then there was at least one other occasion when I spent the night there. I don't remember when it was or whether it was before or after.

Q. Did you ever stay in the home of Jane Doe 7 when your wife was not with you?

A. I believe I did once. I believe, I believe I did. I do not remember for sure. I believe I stayed there once when she was not with me.

Q. On – excuse me for interrupting.

A. I think Bruce Lindsey was with me.

Q. On that occasion did you have sexual relations with Jane Doe 7?

A. Absolutely not.

Q. Have you ever at any time or any location had sexual relations with Jane Doe 7?

A. Never.

Q. Did you ever attend a party at the Hotel del Coronado which was attended by Jane Doe 7?

A. She and her husband owed the hotel, and I went to several events

there, and I think they were there for most of the events I attended.

Q. On any of those occasions were you in one of the rooms of the hotel alone with her?

A. I don't believe so.

Q. And when you were governor of the state of Arkansas, you appointed Jane Doe 2 to the position of Judge on the Arkansas Court of Appeals correct?

A. I did, yes.

Q. And she decided cases on the Court of Appeals for two years, correct?

A. That's correct. It was a newly created Court, and I appointed her to a position on it.

Q. Do you recall when that appointment was made?

A. No.

Q. Now, if she testified that while you were governor you visited her home on more than one occasion when her husband was not there, would that testimony be true?

A. Yes.

Q. How many times did you visit the home of Jane Doe 2 when her husband was not there?

A. I'm not sure. Probably, I don't know, four or five, over a ten-year period, maybe a few more, maybe a few less, I don't know, several times.

Q. And on those occasions, on any of those occasions, were you alone in the house with Jane Doe 2, or were there other people there in the house with you?

A. No those, are – I answered the question you asked me, on those occasions she was there and I was alone.

Q. Were you driven to her house by a state trooper?

A. Yes.

Q. On any occasions did the state trooper come into the house with you?

A. I don't remember. Usually when state troopers drove me places like the homes, they didn't go in with me.

Q. Okay. What would they typically do?

A. Stay outside, look around, see what was going to happen. They normally didn't go inside with me.

Q. Did you ever send them off to run errands on those occasions when you were in the house alone with Jane Doe 2?

A. I don't believe so. I don't remember doing that.

Q. What was the purpose of these visits to Jane Doe 2's house when her husband was not there?

A. The fact that her husband was not there was incidental. She was a friend of mine, and I would go by and see her from time to time. I hadn't been visiting with her in a long time. Sometimes I saw him when she wasn't there. He was a friend of mine, too.

Q. So the purpose was purely social?

A. That's right.

Q. Did you ever –

A. I say the purpose was purely social, there may have been times when we discussed political issues or some other issues. I don't know that they were purely social, but they were personal.

Q. Were any of the visits that you had with Jane Doe 2 at her home when no one else was in the home with you at night?

A. You know, I don't remember going there at night. I may have. I couldn't say that I didn't. I believe the vast majority were in the daylight hours. But I can't say that I was never there at night when they weren't both there. I just don't remember.

Q. Did you ever have sexual relations with Jane Doe 2?

A. No.

Q. At any location?

A. No.

Q. What were her qualifications to serve as a Judge in the Court of Appeals?

A. She was an intelligent, hard-working person who was a good friend and supporter of mine. And I thought she would make a good judge. The evidence is that she did, I think.

MR. FISHER: Objection, non responsive beginning with the words, "The evidence is."

JUDGE WRIGHT: I'll sustain. Go ahead.

Q. Had she ever argued even a single case in the Court of Appeals before you appointed her?

A. I don't think there was a Court of Appeals before I appointed her, so the answer to that would be no, but that would put her in the same boat with every other judge. The Court of Appeals was a newly appointed court. The judges were to be elected but I had to appoint

the first batch so it could sit and begin to decide cases, and then there was a system for electing them. After that they were all elected. That's the way they are now, except when a vacancy occurs, and the governor appoints just for the remainder of the term.

Q. Isn't it a fact that you appointed her to fill the unexpired term of another judge who was moving on to the Arkansas Supreme Court?

A. That could be. That could be. I didn't remember. I was thinking I did it at the beginning of the term, but you're probably, but you're right about that. I'm sorry. I'd forgotten about that.

Q. Do you recall an occasion when you and Jane Doe 2 drove together from the airport to the governor's mansion in her Jaguar?

A. Yes, I remember that.

Q. And she let you drive the Jaguar, correct?

A. She did.

Q. Was there a state trooper in another car driving ahead of you?

A. Well, there must have been. I remember the circumstances of that day quite well, and so I, there would have been a trooper with me all day, so if, if I got to drive the Jaguar, which I wanted to do –

MR. BENNETT: Keep your voice up.

A. If I got to drive the Jaguar, which I wanted to do, then the trooper would have been either behind or just ahead of me, that's what they always did. I didn't drive much like that, but it was too good an opportunity to pass up. I'd never driven a Jaguar before.

Q. You said you remembered the circumstances of that day very well. What do you remember happening on that day?

A. A good friend of hers and mine, Rudy Moore, who was my first chief of staff, son was killed in a tragic car accident in his senior year of high school. I wanted to fly up and see him, and she wanted to go with him, and they were very close, and my recollection is it was on that trip when we got back to Little Rock after going up to see him that either she said do you want to drive the Jaguar or I said can I do it. We were both really profoundly sad, and we both cared a lot about the guy and about his son, and it was a very sad day. I remember it very well.

Q. Did you fly together in a, an airplane?

A. That's correct. She, she flew with me up there.

Q. Is that a commercial aircraft or a chartered plane?

A. I think it was a private airplane. I think it was one we, that we either chartered or borrowed to go up there. I don't believe it was one of the state planes. It could have been. I don't remember which plane it was, to be honest with you.

Q. Do you recall who was on the plane with you?

A. No, there would have been a trooper on the plane. There might have been other people on the plane as well. There were – Rudy had other, a lot of other friends in Little Rock. I just don't remember whether anyone else went.

Q. Do you know a woman named Jane Doe 1?

A. I do.

Q. Do you recall her visiting you at the governor's mansion between the time that you were elected president and the time that you moved to Washington to take office?

A. I do.

Q. On how many occasions in that time span did she visit with you at the governor's mansion?

A. I believe she was there twice. I believe she was there twice.

Q. Was one of those occasions the early morning of the day that you left to go to Washington?

A. I don't – well, I don't know. She came by early in the morning, either the day I left or the day before that, sometime around then. She wanted to come by and say goodbye, and she had to go somewhere else. She came by early, I was up. I don't remember, I honestly don't remember what exact day it was, but it was close to the time I left.

Q. Do you recall that Danny Ferguson was with you when she arrived?

A. I don't have an independent recollection of that. I know what the testimony was, but I don't actually have an independent memory of that.

Q. Where did you meet with her on that day?

A. I believe in the basement, which we were sort of using as the all-purpose office at the time, and which was full to the gills of all kinds of things that were being sent in from all over America, but it was kind of an around-the-clock office for us.

Q. Was that basement room sometimes referred to as the game room>

A. Perhaps.

Q. And while you were talking to Jane Doe 1, was anyone else in the game room with you?

A. No. I don't believe anybody was there.

Q. Was Danny Ferguson outside the game room in an adjoining room?

A. I don't, I don't know where he was. I've already said I don't remember having an independent recollection who was there that day.

Q. Okay. You said you remembered you thought two occasions when you were president-elect that she visited you at the governor's mansion. When was the first of them?

A. I don't remember exactly when it was, but I just have a vague memory that she came once before Christmas, and I gave her some gifts for her children and herself. I believe that's right. I just – I've been trying to think. I think, I'm almost positive there were only two times, and I believe those, I think those were the two occasions. I'm quite sure she was there early in the morning shortly before I left, and I believe she was there one other time, and I believe, but I'm not sure, that's why she was there. That's all I know about that.

Q. Okay. On the first of these two occasions, what time of day did you meet?

A. I don't remember.

Q. Do you remember if it was dark outside?

A. No.

Q. Where did you meet with her on that occasion?

A. I don't remember.

Q. Do you remember whether anyone else was with you when you met with her?

A. No, but – I don't remember, I don't remember. I, I assume not, but I don't remember really. I don't know.

MR. BENNETT: Don't assume, Mr. President.

Q. Did you ever meet with Jane Doe 1 at her apartment? And I'm not just asking about the time when you were president-elect, but any time when you were governor?

A. I have been to her place.

Q. It was located at the Riviera Apartments; is that correct?

A. I don't believe that's right.

Q. What were the apartments called where she lived?

A. I don't remember.

Q. When you visited her place, as you put it, were you accompanied by a state trooper?

A. I don't remember. I'm not sure I was.

Q. Were you governor at the time?

Pages 145 to 160 missing

... to the time when you decided to run for president in the 1992 election, did you take any action to try to suppress any rumors about any particular women who allegedly had had sexual relationships with you?

MR. BENNETT: Now, when you say – excuse me – when he said – objection to the form. When you say "suppress," do you mean him personally? Do you mean him personally?

MR. FISHER: I asked whether he took any action.

MR. BENNETT: Okay, whether he personally took any action. Okay, thank you.

A. Could you could you ask the question again because –

Q. Yes, sir.

A. – I want to give you a completely accurate answer. I want to make sure I understand the question.

Q. Between the time when you decided not to run for president in the '88 election and the time when you decided to run for president in the '92 election, did you take any action to try to suppress any rumors about women who allegedly had had extramarital affairs with you?

A. I believe the accurate answer is that because of what happened in the 1990 governor's race I took action to try to prevent erroneous rumors from becoming public news.

Q. Alright, sir. What action did you take?

A. Well, if I could begin at the beginning. A man named Larry Nichols worked for the state of Arkansas, and while working there he developed quite a grudge against me because he made six hundred long distance phone calls to various right-wing groups with which he was associated, and when it came out his boss thought the taxpayers shouldn't pay for it and dismissed him. He was not reinstated. He claimed that what he was doing was in the public interest. I won't go through the details.

He subsequently directed his anger at me and alleged that I had had affairs with a number of women, so the first action I took that I remember was, he did this on the steps of the Capitol one day in 1980, '90. A few minutes after this press conference he had, I drove up to the Capitol and a reporter confronted me with it. I said to the reporter, this is the first I have ever heard of it, why don't you call the women and ask them if it's true before you run the story. That's the first action I took. I don't know if that qualifies as suppression, but it, back then, you know, if you denied something like that, it didn't get in the press. So that was the first thing that happened.

And then, then a lot of that, that was, as far as I know, that's about as far as it went in 1990. And then some of those were recycled again in the '92 campaign.

Q. During the 1992 campaign, did you give Betsey Wright the responsibility to deal with rumors about alleged extramarital affairs involving you?

A. Along with the other charges that were made against me.

Q. Okay.

A. Which I, some of which I enumerated earlier in my testimony. Someone had to, someone who knew me, at least, had to deal with any charges that came up and had to find the best way to respond to them.

THE WITNESS: Actually, Judge, could I have a five-minute beak? I'd really like to go to the restroom.

JUDGE WRIGHT: Yes, you may. We'll be in recess for five minutes.

(Short Recess)

(Exhibits 10 – 13 marked.)

JUDGE WRIGHT: All right, Mr. Fisher, you may resume.

MR. FISHER: Thank you, Your Honor.

Q. Sir, I'm handing you what has been marked as Deposition Exhibit 10. Do you recognize that as a copy of your responses to the Plaintiff's First Set of Interrogatories in this lawsuit?

MR. [MITCHELL S.] ETTINGER [associate of Mr. Bennett]: Mr. Fisher, do you have an extra copy?

MR. FISHER: I slid two over there.

A. Yes, sir. I do. I recognize this. It, it appears to be signed by Mr. Bennett.

Q. Would you please just read over the response to the interrogatory number one, which is only three lines long, and tell me whether it's still true and correct.

A. It is still true and correct.

Q. All right, thank you, sir. Now, would you please turn to the last page of Deposition Exhibit 10?

A. Yes, sir.

Q. Is that a copy of a verification, which you signed?

A. It is.

Q. I'd like to direct your attention to the words, four lines down, "to the best of my knowledge...

Pages 165 to 176 missing

Q. I was going to ask you that same question. There was not a date on the copy produced to us.

A. I don't know. Let me say, at some point I remember running into Gennifer Flowers when she moved back to Arkansas. She had been away for several years, and I, I ran into her. I didn't know she was back, and she, at some time thereafter she wrote me another letter. I know there were two letters. I don't know which one this is. I'm not – I don't want to mislead you. I just, I don't know which one this is.

Q. Let me show you another one that might help you.

A. Okay.

Q. I'm now handing you, sir Deposition Exhibit 12. Is this another letter from Gennifer Flowers to you?

A. Yes. Now this says, this one has a stamp on it, and a name. The stamp says February 25, 1991.

Q. So this would have been received after she returned to Arkansas from Dallas?

A. That's correct. This one did. But I think the other one was written some years before that, as I, as I remember.

Q. All right. Let's talk about Exhibit 12, the one that has a date on it.

A. And the, the answer to your – well, you asked me a questions about 11, didn't you?

MR. BENNETT: Mr. President let him ask the question.

A. Go ahead.

Q. What if anything did you do in response to Deposition Exhibit 12?

A. Well, there is a note up here in the left-hand corner, though it is not in my handwriting, that says Gaddy on it. Judy Gaddy, and it says Judy has not been very successful in the job hunting area, that's that this letter says. That indicates to me she's already been in touch with her. This letter was just forwarded to her. Judy, Judy Gaddy worked in the governor's office and that was her job, helping people get jobs.

Q. What, if anything, did you do in response to this letter?

A. Well, the letter itself, the copy I have doesn't indicate that I did anything. I have no recollection of doing anything except giving it to Judy Gaddy to see if she could do something to help Gennifer Flowers. She handled many cases like this where people had some difficulties and needed some help.

Q. Eventually Gennifer Flowers was hired to work as a state

employee for the Arkansas Board of Review Appeals Tribunal, correct?

A. That was – some months after this, that's right. I believe that's right. I think several months after that she did get a state job. Which was a few months after this and a few years after the first letter.

Q. At the time Don Barnes was the Chairman of the Board of Review, correct?

A. I don't remember that. It certainly may be right. I don't remember who the Chairman of the Board of Review was at that time.

Q. Did you ever talk to Don Barnes about Gennifer Flowers?

A. I don't remember doing so, sir.

Q. Randall Wright was the head of the Appeals Tribunal; do you recall?

A. No, I know him. I didn't remember that he was head of the Appeals Tribunal.

Q. Did you ever talk to Randall Wright about Gennifer Flowers?

A. No, sir, I don't believe I did.

Q. You mentioned Judy Gaddy because she's mentioned in Deposition Exhibit 12, correct?

A. Excuse me. Yes, her name's up there in the left.

Q. Okay, and you think she's the person to whom you gave this letter from Gennifer Flowers after you received it?

A. I do. You asked me about this handwriting on 11, I think it's probably her handwriting, but I can't be positive.

Q. Okay.

A. She handled these matters for me, all these kinds of request.

Q. And her husband was name Bill Gaddy, correct?

A. That's correct.

Q. He also held a state employment position, right?

A. Yes, he did.

Q. What was his position in 1991?

A. I don't know what his position was in 1991. He held more than one position when I was governor. If you think you know, and you tell me I'll be grateful to know. I don't remember what his position was in 1991, because he had more that one job when I was governor.

Q. Did you ever talk to Bill Gaddy about Gennifer Flowers getting a

job?

A. I don't believe I did, no sir.

Q. After she received the job, did you ever talk about Gennifer Flowers with anyone who was associated with the Board of Review Appeals Tribunal?

A. I do not remember doing so.

Q. Are you aware that a State Grievance Review Committee investigated a complaint concerning the hiring of Gennifer Flowers?

A. I have, I have a memory that there was some, that there was a complaint filed against her. I don't remember that is was about her hiring. I remember there was a complaint filed against her.

Q. Generally, outside of the context of Gennifer Flower, what was a State Grievance Review Committee?

A. I believe it was a committee set up to review the complaints of one state, of a state employee who believed that he or she had been subject to unfair treatment of some kind, and it was sort of the first resort for someone who felt that they had not been miss – that they had not been treated properly in connection with their work.

Q. In the case of Gennifer Flower, an employee named Charlotte Perry filed a grievance with the Grievance Review Committee; is that right?

A. I don't have a specific memory of it. She – there was a grievance. I remember, I have a general memory that there was a grievance.

Q. Do you recall that the committee found the procedure used to hire Gennifer Flowers was, quote, "improper," close quote?

MR. BENNETT: I'm sorry, was proper or improper?

MR. FISHER: Improper.

A. No, I don't recall that.

Q. Do you recall that the Grievance Review Committee found that Ms. Perry had been quote, "unjustly," close quote, eliminated for consideration for the job that was awarded to Gennifer Flowers?

A. No, I don't remember that.

Q. After the state grievance review committee made its findings with regard to the procedure under which Gennifer Flowers was hired, did you do anything in response to that finding?

A. I don't believe so.

Q. Do you remember talking to anyone about the finding?

A. I don't remember doing so. I don't – no. sir, I don't remember. I can't deny that I did, I just – have no memory of that at all.

Q. Did you take any action to try to reverse the decision of the Grievance Review Committee?

A. Not that I remember. Did she have other options? I don't remember what she did. I don't remember what the facts were. I have no recollection of it at all.

Q. Did you ever travel outside of Little Rock, Arkansas with Gennifer Flowers?

A. Not that I recall.

Q. Do you recall going to Los Angeles, California with her?

A. No, sir. When was this? I don't recall.

MR. BENNETT: Don't assume that it happened.

A. I don't believe I ever took a trip outside of Arkansas with Gennifer Flowers.

Q. Did you ever talk to Dolly Kyle, whose name is now Dolly Kyle Browning, about Gennifer Flowers?

A. Yes, I did.

Q. Did you tell Dolly Kyle that you had a sexual relationship with Gennifer Flowers?

A. No, quite the reverse. I told her that I did not have one. I told her that – specifically what I said to Dolly Kyle, and I have, I took notes on that, was that her story was not true, the story she had told was not true.

Q. And when did that conversation with Dolly Kyle take place?

A. It took place at my high school reunion, which was sometime in the summer of 1994 or the late spring of 1994.

Q. I'm handing you what's been marked as Deposition Exhibit 13. Is this Exhibit a copy of notes that you made of something that happened at that high school reunion?

A. It is.

Q. Toward the bottom of the second page, it looks like the handwriting changes. Is that the handwriting of Marsha Scott?

A. It is.

Q. And then after the first three pages, there's a typed transcription of the notes; is that right?

A. Yes, yes.

Q. Have you ever checked the transcription to see if it's correct?

A. I read it over rather quickly. I think it is generally correct. I mean, if you have a specific question I'll double-check it before I answer a specific question. I think is generally correct.

Q. How much time elapsed between the time of the reunion and the time when you made these notes?

A. Oh, a few days. I did it as soon as I got back to Washington, shortly after I got back to Washington. I was in Arkansas that night, that day obviously, and the next day, and then part of another day, and so it was a few days later that I did that.

Q. Did you ask Marsha Scott to make some notes as well?

A. No, I asked her, I said, I said, I asked her to listen to the conversation when it started, and she stood very close so she could hear everything, and then as soon as the conversation was over, I asked her if she had heard it, and I thanked her, and then I made these notes and I asked her if, if they were consistent with my memory, and she said yes, except I think that the, the conversation went on a little longer then you said, which I think is reflected in her comment. Also that's how this happened.

Q. Were the original notes made by Marsha Scott on the same page as your notes as is indicated by the second page of this exhibit?

A. I, I believe so, sir. I believe that's right.

Q. So you wrote your notes first and then she made hers?

A. That's correct. I asked her to read it and see if that was an accurate and complete account of the conversation, and she said she thought it was a very good account of the conversation, except she felt that it had gone on a little longer than my notes indicated, and so she indicated that in her comments.

Q. What was significant about this event that made you want to write these notes about it when you got back to Washington?

A. Well, I think she was – first of all, she was very upset. Secondly, she was mad at me for not calling her back in 1992 when she was the subject of a potential tabloid story, and she thought it manifested a lack of trust in her. Thirdly, she was mad about the Gennifer Flowers story, and I told her it wasn't true, and she said other people thought it was true, and Gennifer Flowers got a hundred fifty thousand dollars, and she needed money too, now.

And then she told me about this book she was going to write, said if anybody ever asked her, she would say it was a fantasy, and I pointed out on two or three occasions how we had been friends since she was a young girl, and how I'd always tried to be her friend, and she basically said she didn't want me to be her friend and she was mad at me because I'd never been her lover, especially since she thought I was notGennifer Flowers' lover, and when I told her Gennifer Flowers' story was bogus and that many, many problems with it had already been proven – it's very hand to prove your innocence in a case like this, but that we'd done it – you know, she just was very angry. That's basically what these notes reflect. And I go through, I

litanize here what we said and how I tried to be a friend to her.

Q. Did she threaten to take some action such that you thought you would need these notes to protect you?

A. No, she didn't threaten to take any action but I knew she'd been through a really tough time, and, and she said that she was virtually desperate for money, her marriage had dissolved under very difficult circumstances, and she had been a title lawyer making quite a bit of money in Texas when the real estate market collapsed, and there was a lot of lawyers lost their jobs that were doing that kind of work, and I just thought for my protection when I saw the kind of look she had in her eyes and the way she was behaving I should ask Marsha to listen to it and then we should make notes after it was over. I wasn't paranoid like this until things like this occurred.

Q. Where were the notes kept?

A. I kept them in a, in a briefcase that was always either under my desk in the White House or in my little private office. That's where they were.

Q. Were they in a file folder?

A. They were. Nothing else, and they were in a file folder.

Q. With anything else?

A. No nothing else was in there.

MR. BENNETT: Your Honor, may I ask how much longer Counsel plans to be? We had indicated a four o'clock meeting, I mean, there's a little bit of flexibility there.

JUDGE WRIGHT: You may certainly ask. I'm not, you know, I'm not making any ruling or saying anything until you-all ask, you know, so –

MR. BENNETT: I'm not asking you to, Judge. Do you have any sense –

MR. FISHER: Your Honor, it might be good if you would give me a couple of minutes, and we can probably make some decisions to cut out a portion of this.

MR. BENNETT: Well, could we take a break then, Your Honor, for five minutes?

JUDGE WRIGHT: Would a break be helpful to you?

MR. FISHER: I think it would.

JUDGE WRIGHT: All right, we'll take another five minute break. That will be fine. We're in recess for five minutes.

(Short recess.)

JUDGE WRIGHT: Have you been able to make some decisions,

Mr. Fisher?

MR. FISHER: Yes, Your Honor, we can be done in ten minutes.

JUDGE WRIGHT: You want to await Mr. Ettinger's return?

MR. BENNETT: I think we can proceed, Your Honor.

JUDGE WRIGHT: All right, let's proceed.

MR. FISHER: We're back on the record?

JUDGE WRIGHT: Yes, sir.

Q. Did you ever have sexual relations with Gennifer Flowers?

MR. BRISTOW: Your Honor, I want to object to that on the basis that there has not been proper predicate laid in that regard. The questioning up to this point in time indicates that the only mention of state employment came as testified to by the deponent. Your Honor has probably had access to the testimony of Gennifer Flowers, who, putting it like this, her allegations, even if believed, indicates that nothing in the nature of a sexual relationship was occurring or occurred after the time that she received any state employment, so the nexus that Your Honor has been requiring in, or the predicate, is just simply not there, and they've had ample opportunity to, you know, to develop that nexus or that predicate today, but they have not done so, and putting it like this, asking whether or not something occurred back in the early seventies or early eighties within the state employment is, we're talking about 1991, and Your Honor has previously made a ruling about the scope, '86 forward, it's just one of those areas that they should not be allowed to pursue.

JUDGE WRIGHT: All right and I'm sure Mr. Bennett agrees with you; is that correct Mr.Bennett?

MR. BENNETT: I'll join in, Your Honor.

JUDGE WRIGHT: All right. The objection is overruled. The Plaintiff's counsel may ask consistent with the Court's prior rulings. Go ahead.

MR. BENNETT: You may ask the question.

A. The answer to your question, if sexual relations are defined as –

MR. BENNETT: No, Mr. President

THE WITNESS: What?

MR. BENNETT: Go ahead.

A. That's right, that was upheld by the court. The answer to your question, if the definition is section one there in the first piece of evidence you gave me, is yes.

Q. On how many occasions?

A. Once.

Q. In what year?

A. 1977.

Q. Did you ever make sexual advances to Gennifer Flowers after that occasion which did not culminate in sexual relations?

A. No.

Q. Did she make sexual advances to you which did not culminate in sexual relations?

A. Yes. Once.

Q. When was that?

A. I don't remember. Sometime after she came back, she invited me to come and see her.

Q. Did you ever visit her at her apartment?

A. I don't believe so. Let me say, I saw her in the Quapaw Tower. I've said this before, and let me explain how this happened that I saw her. I never knew she was back in Arkansas. Contrary to her protestations, I never saw her in Texas, I never knew what she was doing there, I never had any contact with her except once in a while she'd come back to Arkansas and call and say hello and how are you.

I was going into the Quapaw Tower one night to see, I had three very, very close friends, three of my closest friends lived there, and I ran into Gennifer Flowers, and she told me she was back in town and that she was singing, and her mother was ill, and she wanted to be near her mother in southern Missouri, and I, I believe this was in the lobby of the Quapaw tower, but it could have been on the floor where her apartment was, and if so, I could have stuck my head in there for a minute or two, but I don't believe so. I'm pretty sure it was in the lobby.

Q. Is it your testimony then that that's the only occasion on which you ever saw Gennifer Flower at the Quapaw Apartments?

A. Yes. Now I believe that I might have heard her sing once during the years she was back in Arkansas, and I don't remember whether she was singing there at the place in the Quapaw Tower, or whether I heard her sing somewhere else. I just had this vague memory that I also heard her sing once, and it might have been there.

Q. But in an apartment –

A. That's correct.

Q. – or the hallway leading to the apartment –

A. That is my testimony.

Q. – there was only one time you saw her?

A. That's correct.

Q. Move up in time to when you learned that some of the state troopers who had been your security detail were making public statements and talking to reporters. Did you ask Betsey Wright to go talk to Danny Ferguson?

A. After Danny Ferguson reached out to me, I might have done that. I can't remember, because Betsey Wright knew the most about all these issues, so I might well have done that. I don't remember exactly what I asked her to do, but I might, I might well have contacted her and asked her for advice on this since she had dealt with it in the campaign.

Q. Did you talk to her about having Danny Ferguson appear in a news conference?

A. Perhaps I did. I don't recall.

Q. Did she –

A. There's some reference to that in the notes that I, that you and I went over a few moments ago.

Q. Did she ever report back to you that she had asked Danny Ferguson to appear in a news conference?

A. I don't remember. I discussed that directly with Danny Ferguson. I mean I discussed his, possibility of his making a public statement directly.

Q. And did he agree to do so?

A. No.

Q. Did he say why he would not do so?

A. Yes. He said, he said, "I feel threatened, they say they will get me if I say anything about this, and I'm just going to try to do what Ronnie Anderson says and keep my mouth shut."

From that I infer that he had gone along in hopes of getting the money and then thought better of it and didn't want to be embarrassed for the contradictory statement.

Q. While you were governor was there ever a time when you would leave the governor's mansion by yourself in a car or truck owned by one of the state troopers?

A. I don't believe I ever did that.

Q. Do you recall a time when the security guards there at the governor's mansion changed their procedure for keeping logs of who had come to the governor's mansion?

A. No.

Q. That was very awkwardly worded, I apologize. For a time there was a log made of every person who came to the governor's mansion while you were governor, right?

A. I, I don't know.

Q. Okay. Do you recall any discussion about changing the procedure for keeping track of who comes to the governor's mansion?

A. I don't remember. I don't remember how they kept records, who kept them, who, where they were – what the repository was.

Q. Do you recall any discussion of the, of the change in the practice of keeping all of the old phone logs that would reflect all the calls made to the governor's mansion?

A. No, I don't. Now, could you ask that question again?

Q. Do you recall any discussions, sir, about changing the procedure with regard to keeping phone logs of phone calls made to the governor's mansion?

A. Phone calls made to the governor's mansion. No, sir, I don't, I don't recall that.

Q. Do you recall travelling to Denver, Colorado, with L.D. Brown and staying in the Brown Palace Hotel?

A. When was that?

Q. I don't know.

A. I have no idea if L.D. Brown was there. I went to the Brown Palace in 1980 to the Governor's Conference. The Governor's Conference was held in Denver in 1980, and I remember being in the Brown Palace. I'm sorry, I don't remember if I actually stayed there, if that's where we stayed, I remember being there.

Q. Do you recall a trip to Portland, Maine, with L.D. Brown?

A. I have no idea if L.D. Brown was there. I was in Portland, Maine, at the Governor's Conference in 1993 with my family, 19 – excuse me, 1983. 1983.

Q. All right. There was a state trooper with you, you just don't remember if it was L.D. Brown?

A. There probably were two. Normally, normally I think two of them went when I went to the Governor's Conference because there was more work to do.

Q. Let's go back to the trip to Denver. Do you recall during that trip ever asking a state trooper to get the name and phone number of a woman that you had seen?

A. Absolutely not.

Q. And same questions for the trip to Portland, Maine, did you ever

ask a trooper to get the name and phone number of a woman that you saw?

A. Absolutely I did not. Are you asking me about L.D. Brown?

Q. Any trooper that accompanied you on that trip to Portland, Maine.

A. Well, I did not do that, but L.D. Brown did a lot of things, it was well known, for himself, that he tried to lay off on to other people, and I think his reputation is legendary enough that if you talk to enough people involved in security they will tell you the same thing.

Q. Do you know a woman named Cathy Ford?

A. Cathy Ford? There's a woman named Cathy Ford who use to work for me.

Q. Did you ever ask her to talk to L.D. Brown about keeping quiet concerning anything?

A. Not, not that I remember. I might have asked somebody to ask L.D. Brown not to lie, but that would be a fruitless request.

Q. Did you ever have a conversation with Dolly Kyle in which she told you that she had come to the conclusion that she had a sexual addiction?

A. I do not believe so.

(Off-the-record discussion.)

MR. FISHER: At this time, Your Honor, we have no further questions.

JUDGE WRIGHT: Very well. Mr. Bristow?

MR. BENNETT: Could I see Mr. Bristow? Could we take a minute, please?

JUDGE WRIGHT: You may.

MR. BRISTOW: Can we go off the record, Your Honor?

JUDGE WRIGHT: You can go off the record. We'll take a brief recess. I think they're probably trying to cut the time.

(Short recess.)

Cross Examination by Bill Bristow

Q. Mr. President, I am Bill Bristow, and I represent Danny Ferguson. I have a very brief number of questions for you. As you know, the Plaintiff in this case has alleged that Danny Ferguson and yourself entered into some form of an agreement or a conspiracy to violate the rights of Paula Corbin Jones, and I want to ask you to tell me, and the jury may get to hear this testimony, I want you to tell us in terms, very clear terms, whether you and Mr. Ferguson ever had some sort

of an agreement or a conspiracy with regard to violating the rights of Paula, Paula Corbin Jones.

A. No, sir, we did not.

Q. You have, you have indicated that you don't have any recollection of meeting Mrs. Jones on this particular day, but if you and Mr. Ferguson had arrived at some sort of conversation, some sort of an agreement, some sort of a conspiracy, that would be something you would remember, would it not, Mr. President?

A. Well, of course, but I didn't do that.

Q. And the point is, are you able to categorically say that there was never any sort of agreement, never any sort of conspiracy between yourself and Mr. Ferguson with regard to his bringing Paula Jones to meet you or anything like that?

A. Yes.

Q. All right. Now, Mr. President, when you were governor of Arkansas, or even as attorney general, before you ran for president, from time to time when you would be at official functions, did you not find that people wanted to meet you and to be able to be in your presence just, just to meet you? Did you not find that to be common?

A. Yes sir, it was quite common.

Q. And as someone who was in the political arena, actually the fact that people had feelings about you where they would express the right of express the desire to meet you as a person who was holding elective office, was that something you would consider a good thing, that people would want to, to meet you?

A. Yes, sir, I did.

Q. And insofar as those requests would be made, if you were in a position to allow someone to talk to you to fulfill that request to meet you, did you try to do that from time to time?

A. I did that many times.

Q. And not even talking about the number of people that you would have met since you began running for president, but in your time as governor of Arkansas up through May of 1991, would you imagine that there are literally hundreds and thousands of people that you met from time to time who they may remember a meeting with you, but you were, as the governor, were just simply being nice and talking to people that had expressed a desire to meet you?

A. I would think there were several people who would, many people who would remember that they met me, shook my hand, talked to me for a few minutes, that I might not remember, yes.

Q. And a member of your security detail, a state trooper such as Mr. Ferguson, if a constituent of the state of Arkansas, if a, a taxpayer, a voter of the state of Arkansas expressed a desire to meet you, to make your acquaintance, would you not want Mr. Ferguson to bring that to

your attention, or any other member of your security detail, if a prospective voter or a taxpayer had made such a request?

A. Yes, or a child, or anybody from the state, or course I would.

MR. BRISTOW: Mr. President, that's all the questions I have, thank you.

Cross Examination by Robert Bennett

Q. Mr. President, all right, you recall earlier today that Mr. Fisher asked you several questions about Miss Lewinsky?

A. Yes, sir, I do.

Q. And do you recall there was a discussion about an affidavit of Miss Lewinsky, generally?

A. Yes, sir, I remember that.

Q. I'm going to read you certain portions of Miss Lewinsky's affidavit, Miss Lewinsky, also known as Jane Doe Number 6, says as follows: "In the course of my employment at the White House I met President Clinton several times. I also saw the president at a number of social functions held at the White House. When I worked as an intern, he appeared at occasional functions attended by me and several other interns. The correspondence I drafted while I worked at the Office of Legislative Affairs was seen and edited by supervisors who either had the president's signature affixed by mechanism or, I believe, had the president sign the correspondence itself."

Is that an accurate and true statement, to the best of your knowledge?

Q. It's an accurate and true statement about how the correspondence is handled in the Congressional Affairs Division. I can't – I know of no reason why the rest of it's not accurate.

MR. FISHER: Your Honor, excuse me –

A. I don't know directly whether it's all accurate.

MR. FISHER: Just wanted to make clear, Your Honor, that since this is a discovery deposition, that hearsay objections are reserved and need not be made.

MR. BENNETT: I agree with that.

JUDGE WRIGHT: Absolutely, and that's the reason I was trying to say when I came back from lunch that even though I'm permitting Mr. Bennett to do this, if this is ever used at trail, the Rules of Evidence would apply, and as stated before, the Rules of Evidence don't apply in this discovery deposition. Go ahead.

Q. In paragraph eight of her affidavit, she says this, "I have never had a sexual relationship with the president, he did not propose that we have a sexual relationship, he did not offer me employment or other benefits in exchange for a sexual relationship, he did not deny me

employment or other benefits for reflecting a sexual relationship."

Is that a true and accurate statement as far as you know it?

A. That is absolutely true.

Q. Do you recall, do you recall –

MR. BENNETT: Your Honor, may I have this appended as an exhibit to this deposition, please?

MR. FISHER: No Objection. Your Honor.

JUDGE WRIGHT: All right, it may be.

MR. BENNETT: All right.

Q. Now you're aware, are you not, of the allegations against you by Paula Corbin Jones in this lawsuit; is that correct?

A. Yes, sir, I am.

Q. Mr. President, did you ever make any sexual advances towards Paula Jones?

A. No, I did not.

Q. Did you ever ask Paula Jones to kiss your penis?

A. No, I did not.

Q. Now, Mr. President, you've stated earlier in your testimony that you do not recall with any specificity the May 8th, 1991 conference at the Excelsior; is that correct?

A. That's correct.

Q. If that is true, sir, how can you be sure that you did not do these things which are alleged in Ms. Jones' complaint?

A. Because, Mr. Bennett, in my lifetime, I've never sexually harassed a woman, and I've never done what she accused me of doing. I didn't do it then, because I never have, and I wouldn't.

Q. Mr. President, do you recall during your direct examination Mr. Fisher asked you questions about Jane Doe 2?

A. Yes, I do.

Q. And you recall he asked you about being in a Jaguar car with her?

A. Yes, sir, I do.

Q. Mr. President, I'm going to read to you portions of Jane Doe 2's affidavit on January 2nd, I'm sorry, deposition, on January 2nd, 1998.

> Question by Mr. Fisher, You have, "You have been in an automobile with Mr. Clinton, of course, as you've

testified."

And she says, "Yes."

Question, "Have you ever engaged in any sexual activity with Mr. Clinton while he was governor of the state of Arkansas?"

Answer, "Didn't you just ask me that?"

Question, "No, the earlier questions were limited to a certain location."

Answer, "Oh, well, no."

Question, "And so there's absolutely no question about it when I say, quote, "sexual activity," close quote, I mean you touching his genitalia with any part of your body or him touching your genitalia with any part of his body; is that clear?"

Answer, "That's clear."

Question, "And was that definition consistent with the one you used when you answered the earlier questions today?"

Answer, "Yes, I know what sexual activity is."

Did you ever have sex with Jane Doe 2?

A. I believe I answered that earlier. No.

Q. Are her statements here in this deposition true and accurate?

A. They are true.

A. And on any of these – this is a further question.

"And on any of these occasions did you engage in any sexual activity with him?'

Answer, "No."

Question, "At the governor's mansion were you ever with Mr. Clinton in a room with no one else present?"

Answer, "Yes."

Question, "On any of those occasions, did you ever engage in any sort of sexual activity with him?"

Answer, "No."

Were those true and accurate statements by Jane Doe 2?

A. Yes.

Q. My final question, Mr. President, or final few questions, is why didn't you run, I guess, what was it, in 1988 after talking to Betsey Wright? Was it '88?

A. (Witness nods head.)

Q. Why didn't you run? What were the reasons you didn't run?

A. Well, there were several reasons. First of all, I thought I was, – I thought it was a good opportunity, but I thought I – and I thought I was ready politically for the campaign, including the attacks, but I wasn't sure I was mature enough to be president. I think it's a difficult job with a lot of pressure, and particularly nowadays you have to be willing to deal with an enormous amount of distraction from people who have interests other than just seeing you do your job. The other thing was my little girl was very young.

Q. How old was she?

A. She was about seven in 1987, and I could tell that she was really afraid of it, and Hillary and I talked about it, and we knew that in all probability she'd be the only child we ever had, and I just didn't, I just didn't think she was ready for it either.

Pages 209 to 212 missing

.. not to say anything whatsoever about the questions they were asked, the substance of the deposition, the length of it, objections, recess, any details, whether the president did well or did not do well, whether he is credible or not credible, whether he admitted or denied any specific allegations, and this is extremely important to this Court that the, this process not be used for any purpose other than the purpose envisioned in the Rules of Evidence and the Rules of Civil Procedure, and that's all I'm going to say.

I gave a similar admonition about a year-and-a-half ago when I was up here in the White House and it worked that time, and I hope that is works this time as well. If it does not, of course, anyone who violates that can be subject to the sanctions of the Court.

MR. BENNETT: Thank you.

JUDGE WRIGHT: And I will excuse the president, I know he has important business to attend to and he's late, and I will, and I will, but we're going to stay on the record just so Mr. Fisher can make his record, because I'm not letting him ask certain questions.

MR. FISHER: You Honor, there are two questions I'd like to ask, and then depending on the answers to those, there would be obvious follow-up questions, but the two questions are:

Number one, Please name every person with whom you had sexual relations when you were either governor of the state of Arkansas or president of the United States;

Number two, Please name every person with whom you sought to have sexual relations when you were either governor of the state of Arkansas or president of the United States.

If any names are given in response to either/or both of those questions, then obviously there would be follow-up questions to determine whether there are factors that make those incidents relevant.

MR. BENNETT: Your Honor, I, for the record, object, and I would like in the interest of time incorporate by reference the objections here today and all the objections we've made throughout this proceeding.

JUDGE WRIGHT: All right. My ruling, my ruling on all those objections for both, from both sides remain the same.

MR. BENNETT: Thank you, Your Honor.

JUDGE WRIGHT: All right, thank you.

(Exhibit 15 marked.)

(End of Proceedings.)

© Copyright 1998 The Washington Post Company

Back to the top

IN THE SENATE OF THE UNITED STATES
Sitting as a Court of Impeachment

In Re	)
	)
Impeachment of	)
President William Jefferson Clinton	)

Factual Record

Docket Sheet
Jones v. Clinton
C.A. No. LR-C-94-290
District Court of the United States
for the Eastern District of Arkansas

The United States
House of Representatives

HENRY J. HYDE
F. JAMES SENSENBRENNER, JR.
BILL McCOLLUM
GEORGE W. GEKAS
CHARLES T. CANADY
STEPHEN E. BUYER
ED BRYANT
STEVE CHABOT
BOB BARR
ASA HUTCHINSON
CHRIS CANNON
JAMES E. ROGAN
LINDSEY O. GRAHAM

Managers on the Part of the House

Docket Sheet for 4:94-CV-290 Eastern District of Arkansas - Click here for Caption Page

Proceedings include all events

Date Filed	Doc. No.	Image	Description
05/06/1994	1	No	COMPLAINT w/demand for jury trial (Summonses were issued) and returned to: attorney; Filing fee of $120 paid; Receipt #54670
05/06/1994	2	No	MOTION by plaintiff for special or limited appearance by Joseph Cammarata & Gilbert K. Davis
05/06/1994	3	No	ORDER by Judge Susan W. Wright granting motion for special or limited appearance by Joseph Cammarata & Gilbert K. Davis [2-1]; Attorneys have designated Daniel M. Traylor as local counsel (cc: all counsel)
06/10/1994	4	No	ANSWER by separate deft Danny Ferguson; w/jury demand
06/16/1994	5	No	CLERK'S MINUTES: CONFERENCE (ph. cf.) before Judge Wright, Court will allow dft to file mot on immunity; additional time for filing further motions extended to August 5, 1994.
06/20/1994	--	No	UTILITY EVENT: Added attorney(s) Robert S. Bennett, Kathlyn Graves & Stephen Engstrom for President Clinton
06/20/1994	6	No	CONSENT ORDER by Judge Susan W. Wright extending the time until 8/5/94 for President Clinton to respond to the complt purs to the agreement of counsel during a telephone conference on 6/16/94 (cc: all counsel) EOD 6/20/94
06/24/1994	7	No	WAIVER OF SERVICE OF SUMMONS upon defendant Danny Ferguson on 5/19/94
06/24/1994	8	No	WAIVER OF SERVICE OF SUMMONS upon deft William Jefferson Clinton on 5/16/94
06/27/1994	9	No	MOTION by separate deft President Clinton to bifurcate the briefing schedule w/respect to his motion to dismiss, so as to permit him to file a motion to dismiss on the grounds of presidential immunity on or before August 5, 1994, and todefer & preserve all other pleadings that must or may be filed under the FRCP until such time as the presidential immunity issue is resolved
06/27/1994	10	No	MEMORANDUM by deft President Clinton in support of motion to set briefing schedule [9-1]
07/01/1994	11	No	COURT Reporter's transcript of hearing held before Judge Susan Webber Wright on 6/16/94 (1 volumes)
07/06/1994	12	No	ORDER by Judge Susan W. Wright upon oral motion of pltf, pltf is granted until 7/13/94 to resp to deft Clinton's motion to set briefing schedule [9-1]; deft Clinton is granted until 8/10/94 to answer the complt (cc: allcounsel) EOD 7/6/94
07/13/1994	13	No	MEMORANDUM in Opposition by pltf Paula Corbin Jones to motion of deft Clinton to set briefing schedule [9-1]

07/19/1994	14	No	REPLY by deft William Jefferson Clinton to pltf's opposition to motion to set briefing schedule [9-1]
07/21/1994	15	No	RESPONSE BRIEF by pltf Paula Corbin Jones to Mr. Clinton's reply to pltf's opposition to deft's motion to set briefing schedule [9-1]
07/21/1994	16	No	MEMORANDUM AND ORDER by Judge Susan W. Wright granting the President permission to file a motion to dismiss on the grounds of presidential immunity on or before August 10, 1994, and to defer and preserve the filing of any othermotions or pleadings that may or must be filed under the FRCP until such time as the issue of presidential immunity has been resolved by this Court (this order only addresses the procedural issue, not the substantive questions relating to immunity) [9-1] (cc: all counsel) EOD 7/21/94
08/10/1994	17	No	MOTION by deft William Jefferson Clinton to dismiss on grounds of presidential immunity
08/10/1994	18	No	MEMORANDUM by deft William Jefferson Clinton in support of motion to dismiss on grounds of presidential immunity [17-1]
08/10/1994	19	No	ATTACHMENTS to memorandum in support of President Clinton's motion to dismiss [18-1]
08/12/1994	20	No	MOTION by plaintiff Paula Corbin Jones to extend time for responding to defendants motion to dismiss on grounds of presidential immunity
08/12/1994	21	No	ORDER by Judge Susan W. Wright granting motion to extend time for responding to defendants motion to dismiss on grounds of presidential immunity [20-1] [17-1] (cc: all counsel)
08/19/1994	22	No	STATEMENT of Interest of the United States
10/21/1994	23	No	RESPONSE by pltf Paula Corbin Jones to President Clinton's motion to dismiss on grounds of presidential immunity [17-1]
10/21/1994	24	No	MEMORANDUM by pltf in support of motion response [23-1]
10/27/1994	25	No	ORDER by Judge Susan W. Wright that amicus briefs are not to be filed with the Court, and if submitted, will be made a part of the correspondence file (cc: all counsel) EOD 10/27/94
10/27/1994	26	No	MOTION by deft President Clinton for leave to file reply
10/27/1994	27	No	ORDER by Judge Susan W. Wright denying President Clinton's motion for leave to file reply brief [26-1] (cc: all counsel)
11/01/1994	28	No	MOTION by deft President Clinton for oral argument on his motion to dismiss on grounds of presidential immunity
11/03/1994	29	No	MOTION by pltf to permit filing of affidavit of Paula Corbin Jones under seal
11/03/1994	30	No	MEMORANDUM in Opposition by deft President Clinton to pltf's motion to permit filing of affidavit of Paula Corbin Jones under seal [29-1]
11/14/1994	31	No	REPLY by pltf to President Clinton's response to motion to permit filing of affidavit of Paula Corbin Jones under seal [29-1]
11/14/1994	32	No	RESPONSE by pltf to President Clinton's motion for oral argument [28-1]
11/23/1994	33	No	ORDER by Judge Susan W. Wright denying pltf's motion to permit filing of affidavit of Paula Corbin Jones under seal [29-1]; denying President Clinton's motion for oral argument re motion to dismiss on grounds of presidentialimmunity [28-1] (cc: all counsel) EOD 11/23/94
			MEMORANDUM OPINION AND ORDER by Judge Susan W. Wright

12/28/1994	34	Yes: 0 Page(s); 937 KB; PDF	denying President Clinton's motion to dismiss on grounds of presidential immunity; the court will issue a scheduling order in due course [17-1] (cc: all counsel) EOD 12/28/94
12/30/1994	35	Yes: 24 Page(s); 53 KB; PDF	NOTICE of appeal by defendant William Jefferson Clinton from District Court decision [34-1] (appeal fees paid) (2 certified copies to Clerk 8USCA), (cc: counsel)
01/05/1995	36	Yes: 2 Page(s); 62 KB; PDF	MOTION by defendant William Jefferson Clinton to stay pending appeal
01/05/1995	37	Yes: 3 Page(s); 408 KB; PDF	MEMORANDUM by defendant William Jefferson Clinton in support of motion to stay pending appeal [36-1]
01/09/1995	38	Yes: 11 Page(s); 59 KB; PDF	CERTIFICATE REGARDING TRANSCRIPT by defendant William Jefferson Clinton
01/09/1995	38	Yes: 0 Page(s); 60 KB; PDF	Statement of issues on Appeal by defendant William Jefferson Clinton [35-1]
01/13/1995	--	No	DOCKETING LETTER: 8 USCA Number 95-1050; counsel to proceed on appendix
01/17/1995	39	Yes: 2 Page(s); 450 KB; PDF	MEMORANDUM by plaintiff Paula Corbin Jones in opposition to motion to stay pending appeal [36-1]
01/17/1995	40	Yes: 0 Page(s); 53 KB; PDF	NOTICE of cross appeal by plaintiff Paula Corbin Jones from District Court decision [34-1] (appeal fees paid) (2 certified copies to Clerk 8USCA), (cc: counsel)
01/18/1995	41	Yes: 2 Page(s); 500 KB; PDF	REPLY by defendant Clinton to plaintiff's opposition to motion for stay of discovery pending appeal [36-1]
01/25/1995	--	No	DOCKETING LETTER: 8 USCA Number 95-1167; counsel to proceed on appendix
02/24/1995	42	Yes: 13 Page(s); 205 KB; PDF	ORDER by Judge Susan W. Wright granting President Clinton's motion to stay pending appeal [36-1] (cc: all counsel) EOD 2/24/95
03/01/1995	43	Yes: 7 Page(s); 108 KB; PDF	ORDER by Judge Susan W. Wright directing the Clerk to substitute the attached page 2 for the corresponding page in its Order on 2/24/95 [42-1]; the new page deletes part of footnote one (cc: all counsel) EOD 3/1/95
04/01/1996	44	Yes: 4 Page(s); 236 KB; PDF	ORDER (8 USCA), suggestion for rehearing en banc is denied. Petition for rehearing by the panel is also denied
04/18/1996	45	Yes: 6 Page(s); 46 KB; PDF	ORDER (8 USCA), issuance of the mandate shall be stayed until final disposition of the case by the Supreme Court
05/10/1996	46	Yes: 2 Page(s); 18 KB; PDF	ORDER (8 USCA), President Clinton's motion to extend stay of mandate is denied
05/20/1996	47	Yes: 1 Page(s); 25 KB; PDF	NOTICE of filing petition for writ of certiorari with Supreme Court #95-1853
08/16/1996	48	Yes: 1 Page(s); 58 KB; PDF	LETTER to court from USCA8 and Supreme Court; petition for certiorari was granted on 6/24/96. Original pleading files, transcript and depositions are requested to be transmitted to Superme Court Clerk
05/27/1997	49	Yes: 2 Page(s); 31 KB; PDF	NOTICE of filing press release regarding procedures for scheduling case for trial
07/03/1997	50	Yes: 0 Page(s); 464 KB; PDF	ANSWER by deft President William Jefferson Clinton
07/03/1997	51	Yes: 0 Page(s); 89 KB; PDF	MOTION by President Clinton for judgment on the pleadings and dismissal of the complt

07/03/1997	52	Yes: 0 Page(s); 2122 KB; PDF	MEMORANDUM by President Clinton in support of motion for judgment on the pleadings [51-1] and dismissal of the compht [51-2]
07/03/1997	53	Yes: 60 Page(s); 143 KB; PDF	MOTION by President Clinton for status conference
07/07/1997	54	Yes: 5 Page(s); 1505 KB; PDF	Opinion (8USCA)
07/07/1997	55	Yes: 32 Page(s); 94 KB; PDF	MANDATE from 8 USCA affirmed in part, reversing and remanding the Decision of the District Court [Appeal [40-1] [38-1] [35-1]
07/10/1997	56	Yes: 3 Page(s); 48 KB; PDF	NOTICE of change of address for pltf's counsel: Joseph Cammarata, 1725 K Street, N.W., Suite 1401, Washington, DC 20006-1401 and Gilbert K. Davis, 9524-C Lee Highway, Fairfax, VA 22031
07/15/1997	57	Yes: 2 Page(s); 82 KB; PDF	STIPULATION and Order by Judge Susan W. Wright that pltf have up to and including 7/29/97 to file her response to President Clinton's motion for judgment on the pleadings [51-1] and for dismissal of the compht [51-2]; deft shallhave up to and including 8/15/97 to file any reply to each response filed by pltf (cc: all counsel) EOD 7/15/97
07/29/1997	58	Yes: 4 Page(s); 220 KB; PDF	MEMORANDUM by pltf in response to deft Clinton's request for status conference [53-1]
07/29/1997	59	Yes: 0 Page(s); 2929 KB; PDF	MEMORANDUM by pltf in opposition to deft Clinton's motion for judgment on the pleadings [51-1]
08/07/1997	60	Yes: 74 Page(s); 89 KB; PDF	ORDER by Judge Susan W. Wright granting motion for status conference [53-1]; status conference is scheduled for 2:00 on 8/22/97 in courtroom #305(3C); counsel should be prepared to suggest, for the Court's consideration, variousdates for trial in this matter (cc: all counsel) EOD 8/7/97
08/12/1997	61	Yes: 3 Page(s); 181 KB; PDF	AGREED ORDER by Judge Susan W. Wright extending time until 9/2/97 for the Custodians of Records to comply with pltf's subpoenas or to object (cc: all counsel) EOD 8/12/97
08/15/1997	62	Yes: 7 Page(s); 1210 KB; PDF	REPLY BRIEF by President Clinton's motion for judgment on the pleadings [51-1] and dismissal of the compht [51-2]
08/15/1997	63	Yes: 34 Page(s); 199 KB; PDF	REPLY BRIEF by President Clinton in support of phased discovery plan [60-1] [60-2]
08/18/1997	64	Yes: 6 Page(s); 81 KB; PDF	MOTION by deft Danny Ferguson to adopt pleadings
08/21/1997	65	Yes: 3 Page(s); 314 KB; PDF	TABLE OF AUTHORITIES by pltf to memorandum in opposition to motion of deft President Clinton for judgment on the pleadings [59-1]
08/22/1997	67	Yes: 42 Page(s); 108 KB; PDF	CLERK'S MINUTES: STATUS conference before Judge Susan W Wright; Court advises that it has ruled on mot to dismiss and states claims that remain; Court states that a trial date will be set during hearing followed by issuance of ascheduling order; trial set for week of 5/26/98; disc and motions deadlines set; Court advises of procedure to be followed for summoning and selection of jurors; Court directs parties to follow rules of procedure (Lois Lambert, court reporter)
08/22/1997	66	Yes: 0 Page(s); 1686 KB; PDF	MEMORANDUM OPINION AND ORDER by Judge Susan W. Wright granting deft Ferguson's motion to adopt the President's pleadings [64-1]; granting in part and denying in part deft Clinton's motion for judgment on the pleadings [51-1] andfor dismissal of the compht [51-2]; the Court grants the President's motion with respect to pltf's due process claims in Count I of the compht & with respect to her defamation claim against the President in Cout IV; the Court denies the President's motion in all other respects; this case will go forward w/respect to pltf's Section 1983
			SCHEDULING ORDER: by Judge Susan W. Wright; counsel shall be

08/26/1997	68	Yes: 2 Page(s); 222 KB; PDF	present no later than 9:30 am on Tuesday, May, 26, 1998, for disposition of preliminary matters; jury trial is set for 9:30 5/27/98; discovery due 1/30/98; pretrial info sheet due4/24/98; jury instr due 15 calender days prior to trial; exchange of witnesses ddl 12/5/97; motion filing ddl 3/13/98 (cc: all counsel) EOD 8/26/97
09/03/1997	69	Yes: 9 Page(s); 63 KB; PDF	MOTION by movant Joseph Fischer for limited intervention
09/03/1997	70	Yes: 2 Page(s); 1966 KB; PDF	MEMORANDUM of Law by movant Joseph Fischer in support of motion for limited intervention [69-1]
09/08/1997	71	Yes: 57 Page(s); 47 KB; PDF	MOTION by Gilbert K. Davis & Joseph Cammarata to withdraw appearance of counsel for pltf
09/08/1997	72	Yes: 2 Page(s); 147 KB; PDF	MEMORANDUM of Law by in support of motion by Gilbert K. Davis & Joseph Cammarata to withdraw appearance of counsel for pltf [71-1]
09/08/1997	73	Yes: 5 Page(s); 32 KB; PDF	CLERK'S MINUTES: PHONE conference before Judge Susan W Wright with counsel for parties; Paula Jones included in conference re: mot to withdraw filed by counsel for pltf; conference held in camera and under seal; Court grants motto withdraw; order to follow (Lois Lambert, court reporter)
09/09/1997	74	Yes: 1 Page(s); 73 KB; PDF	ORDER by Judge Susan W. Wright upon the Court having held a telephone conference with the parties in camera and under seal on the evening of September 8, 1997, the Court hereby grants the motion by Gilbert K. Davis & Joseph Cammarata towithdraw appearance of counsel for pltf [71-1]; Mr. Davis & Mr. Cammarata are both entitled to reasonable atty's fees for their representation of pltf to date; all deadlines in the Court's scheduling order filed 8/26/97 (doc.#68) including trial date, discovery & motions deadline remain in effect (cc: all counsel) EOD 9/9/97
09/10/1997	75	Yes: 0 Page(s); 1025 KB; PDF	TRANSCRIPT (Volume I) of Status Conference before the Honorable Susan Webber Wright on 8/22/97
09/10/1997	76	Yes: 30 Page(s); 67 KB; PDF	MOTION by Daniel M. Traylor to withdraw as local counsel for pltf
09/11/1997	77	Yes: 2 Page(s); 152 KB; PDF	ORDER by Judge Susan W. Wright granting motion by Daniel M. Traylor to withdraw as local counsel for pltf and directing pro se pltf to be familiar and comply with the FRCP and the Local Rules of the Court; all ddls set by the court'sscheduling order of 8/26/97 remain in place [76-1]; clerk is directed to serve this order on pltf by both regular and certified mail, return receipt requested (cc: all counsel) EOD 9/11/97
09/22/1997	78	Yes: 4 Page(s); 58 KB; PDF	ORDER by Judge Susan W. Wright denying pro se motion by Joseph Fischer for limited intervention [69-1]; terminating party Joseph Fischer (cc: all counsel) EOD 9/22/97
09/26/1997	79	Yes: 3 Page(s); 137 KB; PDF	MOTION by deft President Clinton to compel pltf's production of documents
10/06/1997	80	Yes: 4 Page(s); 69 KB; PDF	MOTION by movant Bruce Darrow Gaither for permission to file Amicus Brief and Brief on the Issue of Subject Matter Jurisdiction
10/06/1997	81	Yes: 3 Page(s); 94 KB; PDF	ATTORNEY APPEARANCE by Donovan Campbell, Jr., James A. Fisher, David M. Pyke, T. Wesley Holmes & J. McCord Wilson for pltf Paula Corbin Jones
10/07/1997	82	Yes: 3 Page(s); 256 KB; PDF	STATEMENT by pltf in opposition to President Clinton's motion to compel pltf's production of documents [79-1]
10/10/1997	83	Yes: 8 Page(s); 71 KB; PDF	ORDER by Judge Susan W. Wright denying motion by movant Bruce Darrow Gaither for permission to file Amicus Brief and Brief on the Issue of Subject Matter Jurisdiction [80-1] terminating party Bruce Darrow Gaither (cc: allcounsel)

10/12/1997	84	Yes: 3 Page(s); 139 KB; PDF	MOTION by pltf for protective order re subpoena for documents and deposition served on Cindy Hayes
10/12/1997	85	Yes: 5 Page(s); 265 KB; PDF	MEMORANDUM by pltf in support of motion for protective order re subpoena for documents and deposition served on Cindy Hayes [84-1]
10/14/1997	86	Yes: 8 Page(s); 684 KB; PDF	FIRST SET of REQUESTS for Admissions by pltf to deft Clinton
10/14/1997	87	Yes: 22 Page(s); 685 KB; PDF	FIRST SET of REQUESTS for Admissions by pltf to deft Ferguson
10/14/1997	88	Yes: 22 Page(s); 55 KB; PDF	RULE 26 MOTION by movant Cindy Hays for protective order
10/14/1997	89	Yes: 2 Page(s); 63 KB; PDF	MOTION by deft Clinton to hold in abeyance the motion to compel filed on 9/26/97 (doc #79)
10/20/1997	90	Yes: 3 Page(s); 119 KB; PDF	NOTICE by pltf of taking depo of Dolly Kyle Browning on 10/28/97
10/23/1997	91	Yes: 4 Page(s); 58 KB; PDF	MOTION by defendant William Jefferson Clinton for leave to file pleadings under seal
10/23/1997	92	Yes: 3 Page(s); 87 KB; PDF	ORDER by Judge Susan W. Wright granting motion for leave to file pleadings under seal [91-1] (cc: all counsel) EOD 10/23/97
10/23/1997	93	No	NOTICE by deft Clinton of filing motion to transfer an ancillary discovery proceeding to this court
10/24/1997	94	Yes: 3 Page(s); 444 KB; PDF	RESPONSE IN OPPOSITION by deft William Jefferson Clinton to motions for protective order [88-1] [84-1] re subpoena for documents and deposition served on Cindy Hayes
10/27/1997	95	Yes: 13 Page(s); 118 KB; PDF	MOTION by deft President Clinton for stay of certain depositions and for immediate relief
10/27/1997	96	Yes: 5 Page(s); 55 KB; PDF	NOTICE by USA of change of address of counsel Scott R. McIntosh & Douglas N. Letter, Appellate Staff, Civil Division - Department of Justice, 601 D Street NW, Room 9550, Washington DC 20530-0001
10/28/1997	97	Yes: 3 Page(s); 656 KB; PDF	NOTICE by pltf of taking depo of designated representatives of Wright, Lindsey & Jennings on 11/4/97
10/28/1997	98	Yes: 14 Page(s); 529 KB; PDF	NOTICE by pltf of taking depo of Marvin Samuel Jones on 11/5/97
10/28/1997	99	Yes: 11 Page(s); 214 KB; PDF	NOTICE by pltf of taking depo of Larry Patterson on 11/4/97
10/28/1997	100	Yes: 6 Page(s); 214 KB; PDF	NOTICE by pltf of taking depo of L. D. Brown on 11/5/97
10/28/1997	101	Yes: 6 Page(s); 215 KB; PDF	NOTICE by pltf of taking depo of Roger Perry on 11/6/97
10/28/1997	102	Yes: 6 Page(s); 1120 KB; PDF	MOTION by pltf for leave to file first amended complt & brief
10/30/1997	103	Yes: 30 Page(s); 681 KB; PDF	REPLY by movant Cindy Hays to President Clinton's response to motions for protective order regarding subpoena to Cindy Hays [84-1] [88-1]
10/30/1997	104	Yes: 18 Page(s); 109 KB; PDF	MOTION by pltf for protective order re subpoena for documents served on the Paula Jones Legal Fund
10/30/1997	105	Yes: 5 Page(s); 266 KB; PDF	MEMORANDUM by pltf in support of motion for protective order re subpoena for documents served on the Paula Jones Legal Fund [104-1]

10/30/1997	106	Yes: 8 Page(s); 72 KB; PDF	ORDER by Judge Susan W. Wright finding President Clinton's motion for stay of certain depositions [95-1] and for immediate relief [95-2] moot, purs to an in camera telephone conference on the evening of 10/27/97, thismatter was resolved (cc: all counsel)
10/30/1997	107	Yes: 3 Page(s); 190 KB; PDF	CONFIDENTIALITY ORDER by Judge Susan W. Wright and on consent of all parties, that all materials, including motions & briefs regarding discovery matters shall be filed under seal; the parties, counsel for parties and agents(including spokespersons) for parties will not disclose the fact that any such filing has been made or any information concerning the content of such filings; counsel for parties will advise all third parties subject to subpoena, or who otherwise provide information in this case (including documents), of this Confidentiality Order (cc: all counsel)
10/31/1997	108	Yes: 1 Page(s); 178 KB; PDF	CLERK'S MINUTES: telephone hrg on 10/27/97; parties are directed not to file notices of depositions as part of record; motion addressing scope of discovery must be submitted by 5:00pm Tuesday; pltf will have until Wednesdayevening to respond; Court will rule Wednesday evening in a telephone conference; Court directs that testimony will be under seal and that lawyers and agents will not make public statements regarding the nature of testimony; Court will sanction any party violating this order and may exclude that party's evidence; Court advises that amended complt
10/31/1997	110	No	MOTION by L.D. Brown to quash subpoena
10/31/1997	109	No	CLERK'S MINUTES: in-camera hearing on 10/29/97, Court discusses keeping discovery matters under seal and states parties were to do research and Bennett has indicated it is proper to keep matters under seal
11/03/1997	114	Yes: 7 Page(s); 86 KB; PDF	ATTORNEY APPEARANCE for plaintiff Paula Corbin Jones; attorney Robert E. Rader, Jr.
11/03/1997	112	No	MEMORANDUM by pltf in opposition to motion of deft Clinton to limit discovery
11/03/1997	113	No	RESPONSE by pltf to Danny Ferguson's motion for relief from deposition schedule
11/03/1997	111	No	EMERGENCY MOTION by pltf under Rule 30(d)(3) and Rule 26(c) for protection against defts' bad-faith deposition campaign orchestrated and conducted solely to annoy and oppress pltf and brief thereon
11/04/1997	115	No	STATEMENT by pltf in opposition to motion to quash subpoena filed by L.D. Brown [110-1]
11/04/1997	116	No	ORDER by Judge Susan W. Wright, regarding a motion to quash a deposition subpoena duces tecum with respect to a potential witness named Kathleen E. Willey, presently pending in the US District Court, Eastern District ofVirginia, Richmond Division (Civil Action No. 97-MC-16), the Court grants pltf's request that the referenced papers in the Virginia court record, not be unsealed and that they be returned to this Court in the event the Virginia court unseals its record in the ancillary matter before it (cc: all counsel)
11/05/1997	117	No	MOTION by pltf for protective order (concerning pltf's deposition)
11/05/1997	118	No	MOTION by deft Clinton for protective order
11/05/1997	121	No	RESPONSE by deft Clinton to pltf's opposition to L.D. Brown's motion to quash subpoena [110-1]
11/05/1997	122	No	RESPONSE by deft Clinton to pltf's motion for protective order concerning pltf's deposition [117-1]
11/05/1997	120	No	RESPONSE by deft Clinton to pltf's motion for protective order

11/05/1997	119	No	MEMORANDUM by deft Clinton in support of motion for protective order [118-1]
11/06/1997	123	No	MOTION by deft Danny Ferguson for relief from deposition schedule
11/06/1997	124	No	MEMO TO FILE (DOC): the following motions were resolved during an in camera phone conference held on the evening of October 29, 1997: (1) Emergency Motion of Plaintiff under Rule 30(d)(3) and Rule 26(c) for Protection againstDefendant's Bad-Faith Deposition Campaign Orchestrated and Conducted Solely to Annoy and Oppress Plaintiff and Brief Thereon [111-1]; and (2) Motion of Danny Ferguson for Relief From Deposition Schedule [123-1]
11/06/1997	125	No	CLERK'S MINUTES: in-camera hearing on 11/6/97, Court denies L D Brown's motion to quash and will permit pltf's counsel to take deposition; discusses where to take Paula Jones deposition
11/10/1997	129	Yes: 3 Page(s); 864 KB; PDF	RESPONSE IN OPPOSITION by President Clinton to pltf's motion to amend compl [102-1]
11/10/1997	126	No	MEMO TO FILE (DOC): The Court has received a letter (attached) from Scott R. McIntosh, Department of Justice, stating that the United States has no objection to its removal from the service list; the Clerk is directed toremove the United States from the service list
11/10/1997	127	No	RESPONSE by deft Danny Ferguson to pltf's requests for admissions
11/10/1997	128	No	RESPONSE by deft Clinton to pltf's first set of requests for admissions
11/12/1997	131	No	MEMORANDUM by pltf in support of motion to compel responses to pltf's second set of interrogs to deft Clinton
11/12/1997	130	No	MOTION by pltf to compel responses to pltf's second set of interrogs to deft Clinton
11/13/1997	132	Yes: 26 Page(s); 445 KB; PDF	RESPONSE IN OPPOSITION by deft Clinton to motions of Paula Jones and Paula Jones Legal Fund for protective order [104-1]
11/13/1997	133	Yes: 14 Page(s); 96 KB; PDF	MOTION by Paula Jones Legal Fund to quash or modify subpoena or, in the alternative for protective order
11/13/1997	134	Yes: 4 Page(s); 306 KB; PDF	MEMORANDUM by Paula Jones Legal Fund in support of motion to quash or modify subpoena [133-1] or for protective order [133-2]
11/13/1997	135	Yes: 8 Page(s); 182 KB; PDF	RULE 45(c)(2)(B) OBJECTIONS by Paula Jones Legal Fund to subpoena duces tecum
11/18/1997	139	No	FEDERAL Rule of Civil Procedure 45(c)(2) (B) Objections to subpoena duces tecum directed to Stephen Jones
11/18/1997	136	No	OBJECTION by Jane Doe to subpoena duces tecum
11/18/1997	137	No	MOTION by Jane Doe to quash subpoena and for protective order
11/18/1997	138	No	BRIEF by Jane Doe in support of motion to quash subpoena [137-1] and for protective order [137-2]
11/20/1997	142	No	SEALED document
11/20/1997	143	Yes: 5 Page(s); 5505 KB; PDF	MOTION by movants Paul Benton Weeks III, Randall E Fisher, Russell Hunt, Lynde Selden II, Donald S Andersen, Michael W Hanna, James J Long, and Jack Mark Stolier to appear as friends of the courtand for leave to file an Amici Curiae Brief
11/20/1997	140	No	MEMORANDUM by deft Clinton in support of Third Parties' Motions to Quash
			CLERK'S MINUTES: in-camera hearing on 11/14/97 regarding release of

11/20/1997	148	No	deposition of Gennifer Flowers; Court states reasons for not wanting to release tape to public; Court takes up motion filed by Jones asking for expeditedresponse re: interrogs and inquires of Clinton's counsel if they can respond in allotted time; Court responds and will allow to respond in normal allotted time
11/20/1997	141	No	NOTICE by deft Clinton of filing pleading in ancillary proceeding (President Clinton's response to Paula Jones' Mischaracterization of Judge Wright's ruling, was filed on 11/17/97 in the ancillary proceeding before Judge Merhigein the Eastern District of Virginia, Richmond Division on the motion to quash of third party Kathleen Willey)
11/20/1997	144	No	MOTION by Jane Doe to terminate or limit examination
11/20/1997	145	No	BRIEF by Jane Doe in support of motion to terminate or limit examination [144-1]
11/20/1997	146	No	MOTION by Jane Doe to protect constitutional privilege
11/20/1997	147	No	BRIEF by Jane Doe in support of motion to protect constitutional privilege [146-1]
11/21/1997	149	No	MEMORANDUM by pltf in opposition to Jane Doe's motion to terminate or limit examination [144-1] and to protect constitutional privilege [146-1]
11/21/1997	150	No	MOTION by Jane Doe for protective order and to quash subpoena duces tecum and notice of deposition
11/21/1997	151	No	BRIEF by Jane Doe in support of motion for protective order [150-1] and to quash [150-2]
11/24/1997	155	Yes: 0 Page(s); 322 KB; PDF	ORDER by Judge Susan W. Wright, subject to the qualifications listed in this Order, pltf's motion for leave to file a first amended complt is hereby granted [102-1] (cc: all counsel) EOD 11/24/97
11/24/1997	154	Yes: 6 Page(s); 183 KB; PDF	REPLY by Paula Jones Legal Fund to President Clinton's opposition response to motion for protective order [133-2]
11/24/1997	152	No	REQUEST by deft Clinton with respect to discovery materials subject to seal
11/24/1997	153	No	RESPONSE by deft Clinton to the objections of Stephen Jones [139-1]
11/24/1997	153	No	MOTION by deft Clinton to compel production of documents by Stephen Jones
11/24/1997	156	No	CLERK'S MINUTES: in-camera hearing on 11/18/97, discusses problem in taking deposition of Jane Doe; Court directs that if there are people other than counsel who are being made aware of information under seal, they need to be madecounsel of record and expects all parties who have been involved in matters under seal to keep circumstances of discussions under seal
11/24/1997	157	No	CLERK'S MINUTES: in-camera hearing on 11/19/97, Court denies motion to quash by Jane Doe, deposition to go forward; Court will look for Bennett's and Holmes' suggestions for keeping discovery materials confidential,and Court is willing to review depositions and make rulings as it can
11/24/1997	158	No	CLERK'S MINUTES: in-camera hearing on 11/24/97, Court to again take up matter of objection to taking deposition of Jane Doe; Court denies motion and states reasons for its ruling; Parties are to consider unsealing records regardingCindy Hays and Paula Jones Legal Defense for next conference; Court and counsel discuss Judge Merhidge's participation in this case and parties are willing to accept his assistance in any settlement negotiations

11/25/1997	160	Yes: 10 Page(s); 393 KB; PDF	ORDER by Judge Susan W. Wright granting in part and denying in part the referenced motions for protective order and objections to subpoenas [84-1] [85-1] [88-1] [104-1] [105-1] [133-1] [133-2] [134-1] [135-1] [94-1] [132-1] [103-1][154-1]; parties are directed to provide this Court on or before 12/2/97, those matters to which the parties cannot agree are or are not privileged; no further briefing is required or will be accepted; the Court will then issue a ruling prior to the deposition of Ms. Hays, which the Court will allow to go forward in a manner and scope that is
11/25/1997	159	No	OPPOSITION RESPONSE by deft Clinton to pltf's motion to compel responses to second set of interrogs
11/26/1997	161	Yes: 10 Page(s); 101 KB; PDF	ORDER by Judge Susan W. Wright that the Court's November 25 Order and the following pleadings referenced therein are hereby unsealed [160-1] [103-1] [104-1] [105-1] [132-1] [133-1] [133-2] [134-1] [135-1] [154-1]; the release ofexhibits and attachments, the Court determines, would not be consistent w/the Court's objective of a fair and impartial jury and a fair trial, therefore the exhibits and attachments to the above referenced pleadings shall remain sealed (cc: all counsel) EOD 11/26/97
11/26/1997	162	No	CLERK'S MINUTES: in-camera hearing on 11/25/97 regarding motion for protective order by Cynthia Hays; Court directs that they continue keeping everything under seal with respect to discovery; Court states it wants to release asmuch to the public as possible that will not impair a fair trial and will direct that exhibits remain under seal
11/26/1997	163	No	MOTION by Jane Doe to show cause
11/26/1997	164	No	BRIEF by Jane Doe in support of motion to show cause [163-1]
12/01/1997	165	No	MEMORANDUM by pltf in opposition to Jane Doe's motion for protective order [150-1] and to quash subpoena duces tecum and notice of deposition [150-2]
12/03/1997	166	No	PROTECTIVE ORDER by Chief Judge Susan W. Wright: that pltf will be allowed to videotape the deposition of Jane Doe pursuant to the restrictions and conditions contained in the Confidentiality Order entered on 10/30/97 and thisProtective Order (cc: all counsel)
12/04/1997	169	Yes: 4 Page(s); 181 KB; PDF	ORDER by Judge Susan W. Wright directing that the referenced documents re the Paula Jones Legal Fund be handed over to the President as expeditiously as possible but no later than 1:00 p.m. (CDT) on Monday, December 8,1997, as the deposition of Ms. Cindy Hays is scheduled for Tuesday, December 9, 1997 (cc: all counsel) EOD 12/4/97
12/04/1997	167	No	MOTION by Jane Doe for protective order and to quash subpoena duces tecum and notice of deposition
12/04/1997	168	No	BRIEF by Jane Doe in support of motion for protective order [167-1] and to quash subpoena duces tecum and notice of deposition [167-2]
12/05/1997	170	Yes: 6 Page(s); 131 KB; PDF	ORDER by Judge Susan W. Wright denying motion to appear as friends of the court and for leave to file an Amici Curiae Brief [143-1]; terminating party Paul Benton Weeks,Randall E Fisher, Russell L Hunt, Lynde Selden, Donald S Andersen, Michael W Hanna, James J Long & Jack Mark Stolier (cc: all counsel) EOD 12/5/97
12/05/1997	171	No	RENEWED MOTION by deft Clinton to compel a response from pltf to his request for production of documents
12/05/1997	172	No	MOTION by deft Clinton to compel pltf's answers to his first and second sets of interrogs
12/05/1997	173	No	MEMO TO FILE (DOC): the motion styled as "Federal Rule of Civil Procedure 45(c)(2)(B) Objections to Subpoena Duces Tecum Directed to Stephen Jones," filed 11/18/97, is moot, the matter having been amicably resolved [139-1]

12/05/1997	174	No	CLERK'S MINUTES: in-camera hearing on 12/2/97, Court rules and states it has reviewed motion and pltf's response and finds that Jane Doe might have testimony that could lead to admissable evidence and denies motion to quash; followinginquiry from Pike concerning filing of witness lists, Court directs that they are not to be filed but only exchanged; parties will be required to let Court know what evidence will be prior to time of President's deposition and will not permit them to ask wide range of issues other than those for trial
12/05/1997	175	No	CLERK'S MINUTES: in-camera hearing on 12/4/97, Court denies motion of Jane Doe to quash subpoena and notice of deposition; Court advises counsel that order will be filed tomorrow denying amicus briefs
12/08/1997	176	Yes: 5 Page(s); 964 KB; PDF	FIRST AMENDED complt [1-1] by pltf w/jury demand
12/08/1997	177	No	MOTION by Betsey Wright for protective order and to quash subpoena duces tecum and notice of deposition
12/08/1997	178	No	MEMORANDUM of points and authorities by Betsey Wright in support of motion for protective order [177-1] and motion to quash [177-2]
12/08/1997	179	No	STATEMENT by pltf in opposition to Jane Doe's motion to show cause [163-1]
12/10/1997	180	No	SEALED document
12/10/1997	181	No	RESPONSE by Jane Doe to pltf's motion to compel Jane Does to answer depositions and to prevent further obstruction of depositions
12/10/1997	182	No	BRIEF by Jane Doe in support of response to pltf's motion to compel Jane Does to answer deposition questions and to prevent further obstruction [181-1]
12/11/1997	185	No	ORDER by Judge Susan W. Wright granting in part and denying in part pltf's motion to compel responses to interrogs; the Court directs that responses to pltf's second set of interrogs be provided to pltf in a manner consistent withthis Order on or before Tuesday, December 23, 1997 (cc: all counsel)
12/11/1997	183	No	MOTION by Jane Doe for extension of time to respond to pltf's motion to compel
12/11/1997	184	No	ORDER by Judge Susan W. Wright denying Jane Doe's motion for extension of time to respond to pltf's motion to compel [183-1]; counsel for Jane Doe is directed to file his response to pltf's motion to compel on or before 12/15/97;the Court will hold in abeyance pltf's request that sanctions be imposed against counsel for Jane Doe until after it has ruled on pltf's motion to compel (cc: all counsel)
12/12/1997	186	No	OPPOSITION RESPONSE by deft Clinton to pltf's motion to compel Jane Does to answer deposition questions
12/12/1997	187	No	CLERK'S MINUTES: in-camera hearing on 12/11/97, Court summarizes its view of the matter and finds that Jane Doe may be deposed and she may be asked questions re: hearsay; Court denies motion to quash subpoena; Court discussescalls received from the press to inquire if Court has ruled that a certain matter will not be in evidence, and the Court states it has not made any formal ruling and is concerned about this
12/15/1997	190	No	SEALED document
12/15/1997	188	No	AGREED PROTECTIVE ORDER by Chief Judge Susan W. Wright: that pltf will be allowed to videotape the deposition of Jane Doe purs to the restrictions and conditions contained in the Confidentiality Order entered on 10/30/97 and thisProtective Order, with the exception of the necessary process of editing the videotape for possible use at trial, no copies shall be made of the videotape except as provided by Order of the Court after

			reasonable notice to all parties (cc: all counsel)
12/15/1997	189	No	RESPONSE by Jane Doe to pltf's motion to compel
12/16/1997	192	Yes: 25 Page(s); 270 KB; PDF	ANSWER by separate deft Danny Ferguson to pltf's first amended complt [176-1] w/jury demand
12/16/1997	191	No	RESPONSE by pltf to deft Clinton's motion to compel answers to interrogs [172-1]
12/17/1997	195	Yes: 8 Page(s); 492 KB; PDF	ANSWER by deft William Jefferson Clinton to first amended complt [176-1] w/jury demand
12/17/1997	193	No	MOTION by pltf to compel answers to pltf's first set of requests for admissions and third set of interrogs to deft Clinton
12/17/1997	194	No	MOTION by pltf to compel responses to pltf's first set of requests for production of documents and things to deft Clinton
12/18/1997	196	No	ORDER by Judge Susan W. Wright regarding Jane Doe motions for protective orders and to quash notices of depositions, this Court, in essentially denying these motions, ruled that a factual predicate must be established with eachdeponent prior to inquiring into any alleged sexual activity between the deponent and President Clinton [137-1] [137-2] [144-1] [146-1] [150-1] [150-2] [163-1] [167-1] [167-2] [177-1] [177-2]; pltf's motion to compel Jane Does to answer deposition questions and to prevent further obstruction of depositions is granted; the parties and
12/19/1997	197	No	CLERK'S MINUTES: in-camera hearing on 12/18/97 regarding the Order entered by the Court under seal today as to the depositions of Jane Does I, II, and III and to take up the matter of a solicitation letter mailed by the RutherfordInstitute (Reporter - Lois Lambert)
12/19/1997	198	No	MOTION by Amy Paul & Eberle & Associates to quash or modify subpoena, and for protective order purs to Rule 26
12/19/1997	199	No	MEMORANDUM by Amy Paul & Eberle & Associates in support of motion to quash [198-1], or modify subpoena [198-2], and for protective order purs to Rule 26 [198-3]
12/19/1997	200	No	AFFIDAVIT of Amy Paul regarding motion to quash [198-1], modify subpoena [198-2], and for protective order purs to Rule 26 [198-3]
12/19/1997	201	No	RESPONSE by pltf to deft Clinton's motion to compel response to request for production of documents [171-1]
12/24/1997	202	No	REPLY by deft Clinton to pltf's response to motion to compel a response from pltf to his request for production of documents [171-1]
12/24/1997	203	No	REPLY by deft Clinton to pltf's response to motion to compel answers to interrogs [172-1]
12/29/1997	204	No	MOTION by pltf to reconsider Court's December 18, 1997 Order
12/30/1997	207	No	RESPONSE IN OPPOSITION by deft Clinton to motion to quash [198-1], modify subpoena [198-2], and for protective order [198-3] by Amy Paul, Eberle & Associates
12/30/1997	205	No	OPPOSITION RESPONSE by deft Clinton to pltf's motion to compel supplemental production of documents [194-1]
12/30/1997	206	No	OPPOSITION RESPONSE by deft Clinton to pltf's motion to compel supplemental responses to certain requests for admission and interrogs [193-1]
12/31/1997	208	No	MOTION by pltf for protective order and sanctions based on violations of the Confidentiality Order and Rule 30(d)(1)

01/05/1998	209	No	CLERK'S MINUTES: in-camera hearing on 12/30/97, matters discussed: plff's pending motions to compel; the Court clarifies it has not made an evidentiary decision regarding plff's sexual history; Attorney Gecker's request for copies of this Court's predicate rulings regarding the Jane Does; the Court has not ruled on any matters involving the White House or individuals associated with the White House; the Court explains its view of coercion regarding this case; the Court instructs parties to work out technical details of deft Clinton's deposition; attorneys will meet with the
01/05/1998	210	No	ORDER by Chief Judge Susan W. Wright denying Jane Doe's motion to show cause [163-1] (cc: all counsel)
01/06/1998	214	No	MEMORANDUM by plff in support of motion to compel responses to plff's first set of interrogs and first requests for production of documents and things to deft Ferguson
01/06/1998	211	No	MOTION by Jane Doe for protective order and to quash subpoena duces tecum and deposition subpoena
01/06/1998	212	No	MEMORANDUM by Jane Doe in support of motion for protective order and to quash
01/06/1998	213	No	MOTION by plff to compel responses to plff's first set of interrogs and first requests for production of documents and things to deft Ferguson
01/07/1998	216	No	OPPOSITION RESPONSE by deft Clinton to plff's motion to reconsider the Court's December 18, 1997 Order
01/07/1998	215	No	CLERK'S MINUTES: in-camera hearing on 1/6/98, Court discusses concerns of Bob Bennett regarding press conference tonight by Paula Jones; Holmes responds that press conference does not have anything to do withdiscovery in this matter; it involves Internal Affairs Division conducting an investigation of IRS audit of Paula Jones
01/08/1998	219	No	SEALED document
01/08/1998	217	No	ORDER by Judge Susan W. Wright regarding motions by Amy Paul and Eberle & Associates, the motion to quash is denied [198-1] [198-2]; the Court agrees to the entry of a protective order [198-3]; the Court's Orders concerning thePaula Jones Legal Fund and its former director, Cindy Hays, which were entered on 11/25/97 and 12/4/97, fully apply to this current dispute; in this regard, any documents that are responsive to the President's discovery request should be handed over to the President on or before 1/15/98; any documents that are responsive to the President's discovery
01/08/1998	218	No	ORDER by Judge Susan W. Wright granting motion to compel plff's answers to first and second sets of interrogs [172-1]; plff directed to answer interrogs on or before 1/15/98, granting renewed motion to compel a response fromplff to request for production of documents [171-1]; any documents that are responsive to the President's discovery requests should be handed over to the President on or before 1/15/98; granting plff's motion to compel answers to plff's first set of requests for admissions and third set of interrogs to deft Clinton; the President is directed to
01/09/1998	222	No	ORDER by Judge Susan W. Wright granting in part and denying in part plff's motion to reconsider the Court's Order of December 18, 1997 (cc: all counsel)
01/09/1998	223	No	ORDER by Judge Susan W. Wright granting the US Secret Service an enlargement of time until 11:00 a.m. (C.D.T.) on Tuesday, January 13, 1998 to respond to subpoenas for documents (cc: all counsel)
01/09/1998	220	No	MOTION by Secret Service for enlargement of time to respond to subpoenas for documents
			CLERK'S MINUTES: in-camera hearing on 1/8/98, Court advises that

01/09/1998	221	No	two orders have been entered today - the one dealing with Codding's motion and the other dealing with four motions to compel filed by the parties which have beengranted for the most part; Court takes up matter of President's deposition set for January 17th and advises that calls have been received from press who are concerned that we should not be so tight-lipped about his deposition
01/12/1998	224	No	SEALED document
01/13/1998	226	Yes. 17 Page(s), 23 KB, PDF	PRESS RELEASE from the Chambers of Judge Susan Webber Wright - The Court has received several inquiries regarding a news article concerning a meeting in Pine Bluff, Arkansas, between this Court and the attorneys representingthe parties in the case of Jones v. Clinton. To the extent the news article suggests otherwise, the purpose of the meeting was to set parameters for the President's deposition. The meeting was not to discuss sanctions or any alleged violation of the Confidentiality Order on Consent of all parties. Counsel for all parties have agreed
01/13/1998	225	No	RESPONSE by deft Danny Ferguson to plff's motion to compel responses to first set of interrogs and first request for production of documents and things
01/13/1998	227	No	MOTION by Secret Service for protective order
01/14/1998	228	No	SEALED document
01/14/1998	230	No	CLERK'S MINUTES: in-camera hearing on 1/13/98 to discuss with counsel article appearing in Washington Times today which indicates Bennett sanctioned by the Court; Court decided to put a press release statement in Clerk's Officeacknowledging meeting in Pine Bluff and that Court has met with counsel and no issue of sanctions is before the Court and purpose was to discuss parameters of President's deposition (Reporter - Lois Lambert)
01/14/1998	231	No	CLERK'S MINUTES: in-camera hearing on 1/13/98, Bennett states that the President requests that Judge Wright attend in person the deposition on Saturday and states reasons; Court advises it would be better to be present to makerulings and will be willing to go to Washington and set at deposition and make rulings (Reporter - Lois Lambert)
01/14/1998	229	No	CLERK'S MINUTES: in-camera hearing on 1/12/98 in Pine Bluff, Court discusses Protective Order previously entered into with respect to discovery and that President's deposition is scheduled for Saturday; Court againencourages parties that they should settle; Bennett states this case is not going to settle and he is going to advise Clinton not to settle case; Fisher advises Court of what plff proposes to put on at trial; Bennett discusses procedure they would like to follow for taking of President's deposition; Court directs parties not to
01/16/1998	232	No	MOTION by plff to compel responses to plff's second set of interrogs and to strike deft Clinton's supplemental responses thereto
01/16/1998	233	No	MOTION by Eberle & Associates to extend Order entered January 8, 1998 and Protective Order
01/16/1998	234	No	MEMORANDUM by Eberle & Associates in support of motion to extend Order entered January 8, 1998 and Protective Order [233-1]
01/20/1998	235	No	MOTION by Jane Doe #6 for protective order and to quash
01/20/1998	236	No	MEMORANDUM by Jane Doe #6 in support of motion for protective order [235-1] and to quash [235-2]
01/20/1998	237	No	MOTION by John B Thompson to clarify, modify, or vacate gag order
01/21/1998	238	No	ATTORNEY APPEARANCE; withdrawing the appearance of Francis D. Carter and substituting Nathaniel Speights for Jane Doe

01/22/1998	239	No	ORDER by Judge Susan W. Wright denying motion by John B. Thompson to clarify [237-1], modify [237-2], or vacate gag order [237-3]; dismiss party John B Thompson (cc: all counsel)
01/22/1998	241	No	MOTION by deft Clinton to compel deposition testimony and documents from the Paula Jones Legal Fund
01/22/1998	240	No	MOTION by deft Clinton for a Rule 26(C) order and in camera inspection of medical records
01/23/1998	243	Yes: 1 Page(s); 14 KB; PDF	STATEMENT from the chambers of Judge Susan W. Wright that the deposition of Monica Lewinsky has been indefinitely continued
01/23/1998	244	No	SEALED document
01/23/1998	242	No	STATEMENT IN OPPOSITION by pltf to motion of Jane Doe #6 for protective order and to quash
01/23/1998	246	No	PROTECTIVE ORDER by Chief Judge Susan W. Wright in re motion by Amy Paul & Eberle & Associates Inc regarding the privacy rights of donors to the Paula Jones Legal Fund [198-3] (cc: all counsel)
01/23/1998	245	No	CLERK'S MINUTES: in-camera hearing on 1/22/98, denying as moot pltf's motion to compel against deft Ferguson [213-1]; Court rules to continue deposition and allow counsel for Jane Doe to file brief by 1/29/98, pltf and other counsel to respond by 2/3/98; the only issue is whether or not Jane Doe has to appear at deposition since she will take 5th; discovery is extended for this deposition only and will be continued until such time as deposition can be scheduled
01/26/1998	247	No	SEALED document
01/26/1998	249	Yes: 1 Page(s); 210 KB; PDF	MOTION by deft President Clinton for expedited trial and motions schedule
01/26/1998	248	No	MEMORANDUM by deft Clinton in support of Secret Service's motion for protective order [227-1]
01/27/1998	250	No	MOTION by pltf to compel CBS to appear for deposition and produce documents
01/27/1998	251	No	MOTION by USA, Office of Independent Counsel ("OIC") for limited intervention and for modification of October 30, 1997 Protective Order
01/27/1998	252	No	MOTION by Jane Doe for protective order and for designation as Jane Doe
01/27/1998	254	No	ORDER by Chief Judge Susan W. Wright modifying October 30, 1997 Protective Order, to permit OIC access to complete copies of any statements made in this action, by or on behalf of President Clinton, Monica Lewinsky or Linda Tripp;and permit the OIC to obtain a complete copy of an unredacted version of the Court's docket sheet in this matter [251-1] [251-2] (cc: all counsel)
01/27/1998	255	No	RESPONSE by pltf to United States' motion for limited intervention and modification of confidentiality order
01/27/1998	253	No	ORDER by Judge Susan W. Wright granting motion for protective order [252-1] and for designation as Jane Doe [252-2] (cc: all counsel)
01/28/1998	256	Yes: 8 Page(s); 251 KB; PDF	EMERGENCY MOTION by Judicial Watch Inc to modify confidentiality order and for access to deposition of William Jefferson Clinton
01/28/1998	257	Yes: 7 Page(s); 121 KB; PDF	NOTICE of Appearance of James A. Hayes, Jr. and Mark S. Ashworth as co-counsel for pltf
01/28/1998	259	No	OPPOSITION RESPONSE by deft Clinton to pltf's motion to compel responses to pltf's second set of interrogs [232-1]

01/28/1998	258	No	RESPONSE by pltf to motion of U.S. Secret Service for protective order [227-1]
01/28/1998	260	No	CLERK'S MINUTES: in-camera hearing on 1/27/98, matters discussed: motion by OIC for limited intervention for modification of Protective Order; Attorney Bennett is concerned that pltf's counsel is subpoenaing witnesses thatOIC has subpoenaed; discussions and arguments between counsel concerning issue of source of leaks (Reporter - Lois Lambert)
01/29/1998	261	Yes: 4 Page(s); 406 KB; PDF	MOTION by movant USA for limited intervention and a stay of discovery
01/29/1998	263	Yes: 11 Page(s); 127 KB; PDF	MOTION by movant Judicial Watch Inc to shorten time to respond to emergency petition to modify confidentiality order and for access to deposition of William Jefferson Clinton
01/29/1998	264	Yes: 4 Page(s); 177 KB; PDF	ORDER by Judge Susan W. Wright granting in part and denying in part USA ("OIC") motion for limited intervention [261-1] and a stay of discovery [261-2]; pltf & defts may not continue with discovery of those matters that concernMonica Lewinsky; in that regard, OIC's motion for limited intervention and stay of discovery is granted; any evidence concerning Ms. Lewinsky shall be excluded from the trial of this matter; with respect to matters that do not involve Monica Lewinsky, OIC's motion is denied and the parties may continue with discovery; because the telephone conference
01/29/1998	262	No	CLERK'S MINUTES: in-camera hearing on 1/29/98, matters discussed: OIC motion for limited intervention and stay of discovery; Court rules that because Lewinsky matter is focus of on-going investigation, it will not be received inthis case (Reporter - Lois Lambert)
01/29/1998	265	No	MOTION by deft Clinton to quash subpoena duces tecum and for protective order
01/30/1998	266	Yes: 6 Page(s); 174 KB; PDF	ORDER by Judge Susan W. Wright granting motion of the Secret Service for a protective order; because the identities of certain individuals are revealed in the Secret Service's motion and were discussed in the telephoneconference, the motion for a protective order, the pleadings filed in response to the motion, and the transcript of this Court's telephone conference, shall remain under seal; the Court will continue to adhere to the Confidentiality Order and will determine what steps to take regarding its breach, if any, at the appropriate time (cc:
01/30/1998	268	Yes: 5 Page(s); 82 KB; PDF	ORDER by Judge Susan W. Wright denying motion by Judicial Watch Inc to shorten time to respond to emergency petition to modify confidentiality order and for access to deposition of William Jefferson Clinton [263-1]; the Courtwill adhere to the normal briefing schedule in considering Judicial Watch's emergency petition [256-1] [256-2] (cc: all counsel) EOD 1/30/98
01/30/1998	267	No	CLERK'S MINUTES: in-camera hearing on 1/29/98, matters discussed: motion of Secret Service for protective order; if 8th Circuit says must include Lewinsky in evidence, may not be able to go to trial in May; pltf's motion to strikeClinton's answers to second set of interrogs will be denied and Court will not require him to answer again; Court will make Secret Service matter a public order because names of individuals are in pleadings which will remain under seal (Reporter - Lois Lambert)
01/30/1998	269	No	MOTION by pltf to compel production of documents or, in the alternative for in camera inspection
02/02/1998	270	No	SEALED document
02/02/1998	271	No	SEALED document
02/02/1998	273	Yes: 3 Page(s); 133 KB; PDF	BRIEF by deft President Clinton in further support of motion for expedited trial [249-1]

02/02/1998	272	No	NOTICE by pltf of documents produced to OIC purs to subpoena
02/04/1998	276	Yes: 0 Page(s); 296 KB; PDF	MOTION by movants Pulitzer Publishing, New York Times Co, Associated Press, USA Today, Cable News Network, Newsday Inc, National Broadcast, CBS Inc, American Brdcstg Co, Time Inc, Little Rock News, and Reporters Committee for leaveto intervene, to modify and/or rescind confidentiality order, and for access to court records and discovery
02/04/1998	277	Yes: 10 Page(s); 628 KB; PDF	MEMORANDUM of Law by movants Pulitzer Publishing, New York Times Co, Associated Press, USA Today, Cable News Network, Newsday Inc, National Broadcast, CBS Inc, American Brdcstg Co, Time Inc, Little Rock News, Reporters Committee insupport of motion for leave to intervene [276-1], to modify [276-2], and/or rescind confidentiality order [276-3], and for access to court records and discovery [276-4]
02/04/1998	278	Yes: 0 Page(s); 30 KB; PDF	PRESS RELEASE: from the Chambers of United States District Judge Susan Webber Wright; In recent weeks, this Court has been deluged with phone calls from the media requesting information on the Monica Lewinsky issue and the PaulaJones case. This Court has well over 200 hundred other cases on its docket and the sheer number of phone calls coming into chambers has hindered this Court from effectively completing its other obligations. Accordingly, the Court has directed that all phone calls be forwarded to the Clerk's Office where messages will be taken. Because it
02/04/1998	274	No	MEMO TO FILE (DOC): pltf's motion to compel CBS to appear for deposition and produce documents [250-1] filed 1/27/98 is moot, the motion having been withdrawn by pltf in a letter dated 2/3/98 (attached)
02/04/1998	275	No	NOTICE by pltf of documents produced to OIC purs to subpoena
02/05/1998	279	Yes: 1 Page(s); 752 KB; PDF	RESPONSE in Opposition by pltf to deft Clinton's motion for expedited trial and motions schedule [249-1]
02/05/1998	281	Yes: 19 Page(s); 199 KB; PDF	BRIEF IN RESPONSE by deft President Clinton to pltf's opposition to motion for expedited trial [249-1]
02/05/1998	280	No	NOTICE by deft Clinton of filing pleading in ancillary proceeding (President Clinton's motion to compel compliance with the subpoena duces tecum and for deposition served on Kirkland & Ellis, Memorandum in Support thereof, andSupplemental filing in further support of motion to compel discovery, were filed on 1/27/98 and 2/4/98 in the ancillary proceeding pending before the Honorable Judge Paul L. Friedman in the US District Court for the District of Columbia)
02/06/1998	282	No	ORDER by Judge Susan W. Wright that any motion for summary judgment and/or response thereto which details or contains sexually explicit or salacious discovery materials not be publically filed without first notifying the Court andopposing counsel (cc: all counsel)
02/09/1998	283	No	OPPOSITION by deft Clinton to subpoena of OIC
02/09/1998	284	No	CLERK'S MINUTES: in-camera hearing on 2/5/98, matters discussed: Court directs that transcript of today's conference be made available to Attridge, Miller & Turk but will not permit them to have access to January 29thconference; allowing parties to object to turning video over to OIC; allowing parties to comment on President's motion for expedited trial; continues to discuss issue of leaks (Reporter - Lois Lambert)
02/10/1998	285	Yes: 7 Page(s); 371 KB; PDF	OPPOSITION by deft President Clinton to Judicial Watch's motion to modify confidentiality order [256-1] and for access to deposition of William Jefferson Clinton [256-2]
02/10/1998	289	Yes: 11 Page(s); 170 KB; PDF	ORDER by Judge Susan W. Wright denying President Clinton's motion for expedited trial and motions schedule [249-1]; the Court intends to explore with counsel the possibility of beginning voir dire of the jury panel prior to May 27,1998, so that the actual trial can proceed as near the May 27 trial date as possible; although the Court will not expedite the

			actual trial of this matter (as opposed to certain pretrial matters), the Court will premit the President to file his motion for summary judgment at any time prior to the March 13 deadline (cc: all counsel) EOD
02/10/1998	290	Yes: 5 Page(s); 217 KB; PDF	MOTION by movant Judicial Watch Inc for an evidentiary hearing to determine whether Clinton/Lewinsky counsel know of any false statements by Clinton/Lewinsky and, if so, to order counsel to have their clients correct same or to havecounsel resign
02/10/1998	286	No	CLERK'S MINUTES: in-camera hearing on 2/6/98; matters discussed: pleading by President's counsel in opposition to subpoena of OIC re: video taped deposition of Clinton; the Court feels comfortable in giving OIC access to Court'sfiles and sealed records for use by Grand Jury in District of Columbia; the Court intends to comply with the subpoena in regard to the documents requested (Reporter - Lois Lambert)
02/10/1998	287	No	MOTION by pltf for reconsideration or, in the alternative for Section 1292(b) certification of order excluding evidence concerning Monica Lewinsky
02/10/1998	288	No	MEMORANDUM by pltf in support of motion for reconsideration [287-1] or, in the alternative for Section 1292(b) certification of order excluding evidence concerning Monica Lewinsky [287-2]
02/11/1998	292	No	MEMO TO FILE (DOC): motion for protective order submitted on behalf of Monica Lewinsky (Jane Doe #6) on January 29, 1998 (but filed on February 11, 1998), is moot by virtue of this Court's Order of January 29, 1998 [235-1] [235-2];dismiss party Jane Doe #6
02/11/1998	291	No	MEMORANDUM by Jane Doe #6 in support of motion for protective order [235-1]
02/12/1998	295	Yes: 6 Page(s); 86 KB; PDF	ORDER by Judge Susan W. Wright denying motion by Judicial Watch Inc for an evidentiary hearing to determine whether Clinton/Lewinsky counsel know of any false statements by Clinton/Lewinsky and, if so, to order counsel to have theirclients correct same or to have counsel resign [290-1] (cc: all counsel) EOD 2/12/98
02/12/1998	293	No	NOTICE by pltf of documents produced to OIC purs to subpoena
02/12/1998	294	No	NOTICE by deft Clinton of documents produced to OIC
02/13/1998	296	No	RESPONSE by pltf to deft Clinton's motion for a Rule 26(C) order and in camera inspection of medical records [240-1]
02/13/1998	297	No	CLERK'S MINUTES: in-camera hearing on 2/12/98, matters discussed: parties are reminded that exhibits to pleadings are to be kept under seal; Court needs to make arrangements with press in courtroom and anticipates having another roomset aside where audio is available; discusses issue of jury selection, questionnaires from other high-profile cases and whether to sequester the jury (Reporter - Lois Lambert)
02/13/1998	298	No	OPPOSITION RESPONSE by deft Clinton to pltf's motion to compel production of privileged documents [269-1]
02/17/1998	299	Yes: 3 Page(s); 76 KB; PDF	MOTION by Judicial Watch Inc for oral argument in the matter of emergency petition to modify confidentiality order and for access to deposition of William Jefferson Clinton
02/17/1998	301	Yes: 3 Page(s); 106 KB; PDF	MOTION by movants Fox News Network LLC & Society of Professional Journalists for leave to intervene, to modify, and/or rescind confidentiality order, and for access to court records and discovery
02/17/1998	302	Yes: 4 Page(s); 115 KB; PDF	MOTION by pro se movant Stephen L Pope to reconsider, and/or modify confidentiality order, and for access to discovery documents and depositions

02/17/1998	303	Yes: 4 Page(s); 149 KB; PDF	MEMORANDUM OF LAW by movant Stephen L. Pope in support of motion to reconsider [302-1], and/or modify confidentiality order [302-2], and for access to discovery documents and depositions [302-3]
02/17/1998	307	Yes: 4 Page(s); 267 KB; PDF	MOTION by deft President Clinton for summary judgment
02/17/1998	308	Yes: 0 Page(s); 2353 KB; PDF	MEMORANDUM by deft President Clinton in support of motion for summary judgment [307-1]
02/17/1998	309	Yes: 64 Page(s); 253 KB; PDF	STATEMENT OF FACTS (Rule 29) by deft President Clinton in support of motion for summary judgment [307-1]
02/17/1998	300	No	ORDER by Judge Susan W. Wright, as it now stands, the President's medical records are protected from disclosure and the Court therefore grants the President's motion for a Protective Order (cc: all counsel)
02/17/1998	304	No	RESPONSE by Paula Jones Legal Fund to motion to compel deposition testimony and documents by deft Clinton
02/17/1998	305	No	MOTION by pltf for leave to conduct limited discovery
02/17/1998	306	No	MEMORANDUM by pltf in support of motion for leave to conduct limited discovery [305-1]
02/18/1998	310	Yes: 7 Page(s); 369 KB; PDF	OPPOSITION RESPONSE by deft President Clinton to nonparty media entities' motion for leave to intervene, to modify, and/or rescind confidentiality order, and for access to court records and discovery [276-1] [276-2] [276-3] [276-4][301-1] [301-2] [301-3] [301-4]
02/19/1998	311	Yes: 10 Page(s); 62 KB; PDF	NOTICE of change of address and telephone number of former counsel for pltf; Joseph Cammarata, 1232 Seventeenth Street, N.W., Washington, DC 20036 (202) 659-8600 & Gilbert K. Davis, 9502-A Lee Highway, Fairfax, VA 22031 (703)352-3850
02/19/1998	312	Yes: 2 Page(s); 91 KB; PDF	NOTICE OF LIEN by Gilbert K. Davis & Joseph Cammarata, former counsel for pltf, in an amount in excess of $800,000 on any recovery by pltf by settlement or trial
02/20/1998	313	Yes: 0 Page(s); 43 KB; PDF	PRESS RELEASE: From the Chambers of United States District Judge Susan Webber Wright; The Court is aware of the media concerns related to access and coverage of Jones v. Clinton, No. LR-C-94-290, should the case go to trial inMay. The Court will address courtroom access and courthouse credentialing issues in due course. The Court would like to advise the media that issues regarding access and coverage will be coordinated through the Clerk of the Court. The Court is further looking to the media to establish a "Media Consortium" based upon the Denver model
02/20/1998	314	No	SEALED document
02/20/1998	315	No	SEALED document
02/20/1998	316	No	SEALED document
02/20/1998	317	No	SEALED document
02/20/1998	318	Yes: 3 Page(s); 112 KB; PDF	MOTION by pltf to extend time to respond to deft Clinton's motion for summary judgment
02/23/1998	319	Yes: 50 Page(s); 228 KB; PDF	OPPOSITION RESPONSE by deft Clinton to pltf's motion to extend time to respond to motion for summary judgment [318-1]
02/24/1998	320	Yes: 7 Page(s); 80 KB; PDF	ORDER by Judge Susan W. Wright granting pltf's motion to extend time until 3/13/98 to respond to deft Clinton's motion for summary judgment [318-1] [307-1]; separate deft Clinton will have until 3/20/98 to file a reply to theresponse; once a reply is filed, the matter will be ripe for determination (cc: all counsel) EOD 2/24/98

02/24/1998	321	Yes: 3 Page(s): 104 KB: PDF	PRESS RELEASE: From the Chambers of United States District Judge Susan Webber Wright; The Court has been informed that a "Media Consortium" to facilitate media coverage of Jones v. Clinton, No. LR-C-94-290 was formed on Friday,February 20, 1998, at a meeting of representatives of various national and local print and broadcast media organizations in Little Rock. The Consortium will be patterned on the Denver consortium formed for the Oklahoma City bombing trials. Bill Headline, retiring from CNN on 2/28/98, was asked and has agreed to operate the
02/25/1998	322	No	OPPOSITION RESPONSE by deft Clinton to plif's motion for reconsideration [287-1] or, in the alternative for Section 1292(b) certification of this Court's January 29, 1998 Order [287-2]
02/26/1998	323	No	OPPOSITION RESPONSE by deft Clinton to plif's motion for leave to initiate additional discovery [305-1]
02/27/1998	324	No	MOTION by plif for leave to conduct limited additional discovery of Kathleen Willey and Nathan Landow
03/02/1998	325	No	REPLY BRIEF by plif in support of motion to compel production of documents [269-1] or, in the alternative for in camera inspection [269-2]
03/04/1998	326	Yes: 2 Page(s): 31 KB: PDF	MOTION by deft Danny Ferguson for summary judgment
03/04/1998	327	Yes: 2 Page(s): 282 KB: PDF	MEMORANDUM and Exhibits by deft Danny Ferguson in support of motion for summary judgment [326-1]
03/04/1998	328	Yes: 10 Page(s): 65 KB: PDF	STATEMENT OF FACTS (Rule 29) by deft Danny Ferguson in support of motion for summary judgment [326-1]
03/05/1998	330	Yes: 2 Page(s): 179 KB: PDF	ORDER by Judge Susan W. Wright regarding rules for the media with respect to the trial courtroom and the auxiliary courtroom; all actions and recommendations of the consortium are subject to approval and modification by theCourt [313-1]; the Court will issue further orders concerning these matters and others, including the voir dire (cc: all counsel) EOD 3/5/98
03/05/1998	329	No	REPLY Memorandum by plif n support of her motion for reconsideration [287-1] or, in the alternative for Section 1292(b) certification of order excluding evidence concerning Monica Lewinsky [287-2]
03/05/1998	331	No	MOTION by deft Clinton to unseal Kirkland & Ellis discovery dispute and for immediate production of privilege log
03/05/1998	332	No	OPPOSITION RESPONSE by deft Clinton to motion to take discovery out of time from Kathleen Willey and Nathan Landow [324-1]
03/06/1998	333	Yes: 6 Page(s): 62 KB: PDF	SUPPLEMENT to Emergency Motion by movant Judicial Watch Inc to modify confidentiality order and for access to deposition of William Jefferson Clinton
03/09/1998	335	Yes: 2 Page(s): 416 KB: PDF	ORDER by Judge Susan W. Wright denying each of the motions to rescind and/or modify the Court's confidentiality order and the requests for intervention and oral argument [256-1] [256-2] [299-1] [276-1] [276-2] [276-3] [276-4] [301-1][301-2] [301-3] [301-4] [302-1] [302-2] [302-3] [333-1] [333-2]; the Court concludes that the reasons stated in today's decision constitute a compelling governmental interest in maintaining under seal the discovery materials on file with the Court; dismiss party Stephen I. Pope, Society Pro Journal, Fox News Network LLC, Judicial Watch
03/09/1998	336	Yes: 12 Page(s): 561 KB: PDF	MEMORANDUM AND ORDER by Judge Susan W. Wright denying plif's motion for reconsideration or, in the alternative, for 28 USC 1292(b) certification (interlocutory appeal) of the Order excluding evidence concerning Monica Lewinsky(cc: all counsel)

03/09/1998	334	No	REPLY MEMORANDUM by plff in support of her motion for leave to conduct limited additional discovery of Kathleen Willey and Nathan Landow [324-1]
03/10/1998	337	No	MOTION by deft Clinton to require plff and the Rutherford Institute to provide the Court with the names of persons in the Eastern District of Arkansas who were sent fundraising solicitations
03/11/1998	340	Yes: 15 Page(s); 103 KB; PDF	NOTICE of appeal by movants Reporters Committee, Little Rock News, Time Inc, American Broadcg Co, CBS Inc, National Broadcast, Newsday Inc, Cable News Network, USA Today, Associated Press, New York Times Co, Pulitzer Publishing,Fox News Network LLC, Society Pro Journal from District Court decision [335-2] (2 certified copies to Clerk 8USCA), (appeal fees paid)(cc: counsel)
03/11/1998	338	No	ORDER by Judge Susan W. Wright, without objection, the President's motion to quash subpoena duces tecum and for Protective Order, filed 1/29/98, is hereby granted (cc: all counsel)
03/11/1998	339	No	CLERK'S MINUTES: in-camera hearing on 3/10/98, matters discussed: Court advises parties that Judge Johnson issued an order yesterday re: subpoena to this Court to turn over to OIC video tape of President's deposition for grand jurymaster; investigation of leaks; parties reminded it is a violation of protective order for counsel to share discovery information with anyone outside this case, including OIC; Court has met with Bill Headline who will be head of the media consortium; discusses sequestering jury; Court has asked USM to reserve motel rooms for jury,
03/13/1998	342	Yes: 101 Page(s); 4141 KB; PDF	OPPOSITION RESPONSE by plff to deft Clinton's motion for summary judgment [307-1] (with Volumes I & II of supporting evidence)
03/13/1998	341	No	ORDER by Judge Susan W. Wright, regarding "leaks" of discovery matters that were filed under seal pursu to the Court's Confidentiality Order of 10/30/97 [307-1], the Court hereby requires all counsel of record and all pertinent state, by sworn affidavit, any information they may have regarding the source of these leaks; the Court requires the following individuals to submit affidavits: (1) John W. Whitehead, (2) Stephen H. Adea, and (3) White House Counsel Charles Ruff; all affidavits must be filed with the Court, under seal, on or before Wednesday, March 25, 1998 (cc: all
03/17/1998	343	Yes: 0 Page(s); 747 KB; PDF	STATEMENT OF MATERIAL FACTS (Rule 29) by plff in support of motion response [342-1]
03/19/1998	--	No	DOCKETING LETTER: 8 USCA Number 98-1696; counsel to proceed on appendix
03/19/1998	344	No	NOTICE/Motion by deft Clinton to withdraw opposition to reopening discovery from Kathleen Willey and Nathan Landow
03/20/1998	345	Yes: 7 Page(s); 244 KB; PDF	STATEMENT IN OPPOSITION by plff to deft Ferguson's motion for summary judgment [326-1]
03/20/1998	346	Yes: 20 Page(s); 871 KB; PDF	STATEMENT OF FACTS (Rule 29) by plff in support of motion response [345-1]
03/20/1998	347	Yes: 20 Page(s); 1354 KB; PDF	REPLY by deft President Clinton in further support of his motion for summary judgment [307-1]
03/20/1998	348	Yes: 0 Page(s); 185 KB; PDF	MOTION and Appendix by deft President Clinton to strike materials filed by plff in connection with her opposition to summary judgment
03/23/1998	349	No	AFFIDAVIT of Stephen Engstrom regarding order [341-1]
03/24/1998	351	No	AFFIDAVIT of Bill W. Bristow regarding order [341-1]
03/24/1998	352	No	AFFIDAVIT of Danny Ferguson regarding order [341-1]

03/24/1998	350	No	RESPONSE by plff to deft Clinton's motion to require plff and the Rutherford Institute to provide names of recipients of fundraising communications [337-1]
03/25/1998	353	No	AFFIDAVIT of Robert Batton regarding order [341-1]
03/30/1998	368	Yes: 42 Page(s); 21 KB; PDF	PRESS RELEASE from the Chambers of US District Judge Susan Webber Wright: The Court has received numerous inquiries from the media regarding the logistics of obtaining a copy of this Court's opinion ruling on President Clinton'smotion for summary judgment in the case of Jones v. Clinton. This is to inform all those who may be interested that simultaneous with the public release of the opinion in the Clerk's Office, the opinion will be posted on the Court's web site at the following address: www.ard.uscourts.gov
03/30/1998	369	Yes: 1 Page(s); 505 KB; PDF	REPLY by deft President Clinton in further support of motion to strike materials filed by plff in connection with her opposition to summary judgment [348-1]
03/30/1998	369	No	MOTION by deft President Clinton for additional relief (that additional sanctions be imposed)
03/30/1998	354	No	AFFIDAVIT of Robert S. Bennett regarding order [341-1]
03/30/1998	355	No	AFFIDAVIT of Charles F.C. Ruff regarding order [341-1]
03/30/1998	356	No	AFFIDAVIT of Kathlyn Graves regarding order [341-1]
03/30/1998	357	No	AFFIDAVIT of Mitchell S. Ettinger regarding order [341-1]
03/30/1998	358	No	AFFIDAVIT of Amy R. Sabrin regarding order [341-1]
03/30/1998	359	No	AFFIDAVIT of Katharine S. Sexton regarding order [341-1]
03/30/1998	360	No	JOINT DECLARATION of John W. Whitehead and Steven H. Aden regarding order [341-1]
03/30/1998	361	No	DECLARATION of Robert E. Rader, Jr. regarding order [341-1]
03/30/1998	362	No	DECLARATION of Donovan Campbell, Jr. regarding order [341-1]
03/30/1998	363	No	DECLARATION of James A. Fisher regarding order [341-1]
03/30/1998	364	No	DECLARATION of David M. Pyke regarding order [341-1]
03/30/1998	365	No	DECLARATION of T. Wesley Holmes regarding order [341-1]
03/30/1998	366	No	DECLARATION of Paula Jones regarding order [341-1]
03/30/1998	367	No	DECLARATION of McCord Wilson regarding order [341-1]
03/31/1998	373	Yes: 14 Page(s); 87 KB; PDF	ORDER by Judge Susan W. Wright, as the parties have filed a number of contentious pleadings and have perhaps engaged in activities in violation of court orders, as an interim measure, this Court directs the parties as follows: 1) Forreasons previously stated to counsel, no party should make public any pleading, past, present, or future, which reveals the identity of any "Jane Doe". 2) Any lawyer or litigant found to be in contempt (either as a result of discovery abuses or as a result of violations of court orders) will be subject to the full range of sanctions
03/31/1998	374	Yes: 0 Page(s); 860 KB; PDF	RESPONSE by plff to deft Clinton's motion to strike plff's summary judgment materials [348-1] (this pleading was filed on Saturday, March 28, 1998 at 1:55pm in our Pine Bluff Divisional Office's drop box and was received in thisoffice on 3/31/98)
03/31/1998	370	No	MOTION by USA (OIC) for limited intervention and a stay of Kathleen Willey's further deposition

03/31/1998	371	No	MOTION by pltf for sanctions against Mr. Clinton and to compel production of documents
03/31/1998	372	No	MEMORANDUM by pltf in support of motion for sanctions against Mr. Clinton [371-1] and to compel production of documents [371-2]
04/01/1998	375	Yes: 21 Page(s); 54 KB; PDF	REPLY by deft Danny Ferguson in further support of his motion for summary judgment [326-1]
04/01/1998	376	Yes: 39 Page(s); 1793 KB; PDF	MEMORANDUM OPINION AND ORDER by Judge Susan W. Wright granting the President's and Ferguson's motions for summary judgment [307-1] [326-1]; there being no remaining issues, the Court will enter judgment dismissing this case (cc: allcounsel) EOD 4/1/98
04/01/1998	377	Yes: 1 Page(s); 24 KB; PDF	JUDGMENT: by Judge Susan W. Wright purs to the Memorandum Opinion and Order entered this date, this case is hereby dismissed; the relief sought is denied; terminating case (cc: all counsel) EOD 4/1/98
04/03/1998	--	No	DOCKETING LETTER: 8 USCA Number 98-1869; petition for writ of mandamus has been filed and submitted to a panel of judges
04/07/1998	378	Yes: 0 Page(s); 63 KB; PDF	ORDER by Judge Susan W. Wright, without objections, all pending motions in this matter are hereby deemed moot purs to the judgment entered on April 1, 1998 [377-2] (cc: all counsel) EOD 4/7/98
04/07/1998	379	No	NOTICE by pltf of documents and things produced to OIC purs to subpoena
04/13/1998	381	Yes: 3 Page(s); 19 KB; PDF	JUDGMENT (8 USCA) Paula Jones, petitioner has moved to withdraw her writ petition. Pursuant to that motion, the petition is disimssed
04/13/1998	380	No	NOTICE by pltf of documents produced to OIC purs to subpoena
04/29/1998	382	Yes: 1 Page(s); 88 KB; PDF	NOTICE of appeal by plaintiff Paula Corbin Jones from District Court decision [376-1], [377-2] (appeal fees not paid) (2 certified copies to Clerk 8USCA), (cc: counsel)
04/29/1998	383	Yes: 4 Page(s); 99 KB; PDF	AGREED ORDER by Judge Susan W. Wright that any motions or petitions for attorney's fees and costs must be filed no later than 14 days after the date that an Order of Judgment becomes final and nonappealable in this matter, unless thisdeadline is modified by further Court order (cc: all counsel) EOD 4/29/98
05/04/1998	--	Yes: 0 Page(s); 4104 KB; PDF	DOCKETING LETTER: 8 USCA Number 98-2161; counsel to proceed on appendix
05/06/1998	384	No	SEALED document
05/11/1998	385	No	TRANSCRIPT PURCHASE ORDER by plaintiff Paula Corbin Jones
05/21/1998	386	No	RESPONSE by deft President Clinton to pltf's order of transcripts [385-1]
05/26/1998	387	No	MOTION by Joseph Cammarata & Gilbert K Davis to designate part of the record
06/03/1998	388	Yes: 3 Page(s); 88 KB; PDF	MANDATE from 8 USCA Appellants Pulitzer Publishing Co, et al in an appeal filed prior to the District Court's grant of summary judgment to the defendants, seek to unseal the pleadings and discovery. In view of the grant of summaryjudgment, we remand the case to the District Court and request that court to consider the need for keeping its confidentiality order in place. Given this disposition, we do not reach the merits of the appeal. The appeal is dismissed and the matter is remanded to the District Court [Appeal 340]
			ORDER by Judge Susan W. Wright in accordance with the Order of the

06/08/1998	389	Yes: 4 Page(s); 137 KB; PDF	Eighth Circuit [388-1], the parties are hereby directed to file with this Court, on or before 6/19/98, briefs setting forth their positions, if any, on the needfor keeping in place the Confidentiality Order [304-1]; (cc: all counsel) EOD 6/8/98
06/10/1998	390	Yes: 23 Page(s); 1249 KB; PDF	ORDER by Judge Susan W. Wright granting motion to designate letters dated 8/19/97 and 8/29/97 from Cammarata and Davis to Paula Jones and Proposed Stipulation of Settlement as part of the record on appeal [387-1] (cc: allcounsel and Clerk USCA8)
06/12/1998	391	Yes: 3 Page(s); 89 KB; PDF	CORRECTED ORDER (8 USCA) to show Eastern District of Arkansas
06/19/1998	392	Yes: 10 Page(s); 374 KB; PDF	BRIEF filed by plaintiff setting forth her position on the need for keeping in place the confidentiality order [389-1]
06/19/1998	393	Yes: 16 Page(s); 617 KB; PDF	MEMORANDUM of law filed by Media Entities addressing the continuation of the court's confidentiality order [389-1]
06/19/1998	394	Yes: 13 Page(s); 538 KB; PDF	BRIEF filed by deft William Jefferson Clinton in further support of court's 10/30/97 confidentiality order [389-1]
06/30/1998	395	Yes: 7 Page(s); 334 KB; PDF	MEMORANDUM AND ORDER by Judge Susan W. Wright vacating the Confidentiality Order [107-1] as to those matters which do not reveal the identities of any Jane Does and hereby unseals the record in this matter; the ConfidentialityOrder shall remain in effect with respect to the identities of any Jane Does who may be revealed in the Court record, in any materials in possession of the parties that have not been filed of record, and in any public statements; in addition, all videotapes of depositions taken in connection with this lawsuit shall remain under seal; parties have
07/08/1998	396	Yes: 12 Page(s); 461 KB; PDF	MOTION by deft President Clinton for reconsideration and stay of June 30, 1998 Order
07/09/1998	397	No	SEALED document
07/09/1998	398	Yes: 2 Page(s); 62 KB; PDF	ORDER by Judge Susan W. Wright, because parties have 14 days to respond to the President's motion for reconsideration [396-1], the Court's June 30th Memorandum and Order [395-1] partially unsealing the record in this matter will not takeeffect on Monday, July 13, 1998, and no documents will be unsealed at that time; in this regard, the Court's Confidentiality Order on Consent of all Parties entered on 10/30/97 [107], shall remain in full force and effect until such time as the Court issues a ruling that says otherwise (cc: all counsel) EOD 7/9/98
07/09/1998	399	Yes: 3 Page(s); 98 KB; PDF	MOTION by USA (OIC) to maintain confidentiality of March 27, 1998 filing
07/10/1998	400	No	MOTION by Jane Doe to intervene for the limited purpose of seeking reconsideration of the Court's June 30, 1998 Memorandum and Order
07/10/1998	401	No	MOTION by Jane Doe for modification of the Court's June 30, 1998 Memorandum and Order
07/15/1998	402	Yes: 10 Page(s); 365 KB; PDF	MOTION by movant Dolly Kyle Browning for protective order
07/17/1998	403	Yes: 7 Page(s); 250 KB; PDF	MEDIA ENTITIES'MEMORANDUM in opposition to motion for reconsideration and stay of June 30, 1998 Order [396-1]
07/17/1998	404	No	MOTION by Jane Doe to intervene
07/22/1998	405	Yes: 15 Page(s); 655 KB; PDF	RESPONSE IN OPPOSITION by pltf to President Clinton's motion for reconsideration and stay of June 30, 1998 Order [396-1]
			ORDER by Judge Susan W. Wright granting President Clinton until

07/22/1998	406	Yes: 1 Page(s); 31 KB; PDF	7/29/98 in which to file a reply to the media's and pltf's responses to his motion for reconsideration of this Court's Memorandum and Order dated June 30, 1998 [403-1][405-1] [396-1] [395-1] (cc: all counsel) EOD 7/22/98
07/23/1998	407	No	MOTION by Jane Doe for reconsideration or, alternatively for modification of Order
07/23/1998	408	No	BRIEF by Jane Doe in support of motion for reconsideration [407-1] or, alternatively for alteration of Order [407-2]
07/24/1998	410	Yes: 9 Page(s); 275 KB; PDF	MOTION by Paula Corbin Jones to reconsider Court's June 10, 1998 order
07/24/1998	409	No	STATEMENT IN OPPOSITION by pltf to Jane Doe's motion for modification of the Court's June 30, 1998 Memorandum Order [401-1]
07/29/1998	411	Yes: 19 Page(s); 771 KB; PDF	REPLY MEMORANDUM by deft President Clinton a further support of motion for reconsideration of June 30, 1998 Order [396-1]
08/06/1998	412	No	MOTION by deft Clinton for personal counsel, David E. Kendall to view videotape of President's deposition
08/07/1998	413	No	OPPOSITION RESPONSE by pltf to motion for persons other than counsel of record to view videotape of Mr. Clinton's deposition [412-1]
08/07/1998	413	No	MOTION by pltf to unseal deft Clinton's motion and this response immediately
08/07/1998	414	No	REPLY by deft Clinton to pltf's opposition response to the expedited motion for personal counsel of President Clinton to view videotape of President's deposition [412-1]
08/10/1998	415	Yes: 3 Page(s); 120 KB; PDF	ORDER by Chief Judge Susan W. Wright granting President Clinton's motion that his personal counsel David E. Kendall be permitted to view the videotape of the President's January 17, 1998 deposition, subject to Court supervision;Mr Kendall is hereby subject to all terms and conditions of the Confidentiality Order; pltf Jones' motion to unseal the pleadings regarding this matter is denied at this time, pending this Court's ruling on motion for reconsideration of this Court's Order of June 30, 1998 partially unsealing the record in this case (cc: all counsel) EOD 8/10/98
08/21/1998	416	Yes: 3 Page(s); 70 KB; PDF	WITHDRAWAL by plaintiff Paula Corbin Jones of motion to reconsider Court's June 10, 1998 order [410-1]
09/01/1998	417	Yes: 10 Page(s); 407 KB; PDF	MEMORANDUM AND ORDER by Chief Judge Susan W. Wright granting in part and denying in part the President's motion for reconsideration [396-1]; the Confidentiality Order is hereby modified as set forth in this Memorandum and Orderregarding (1) court filings that are under seal, (2) discovery materials in the hands of the parties that are not filed with the Court but are nevertheless under seal as subject to the Confidentiality Order, and (3) videotaped and transcribed depositions [395-1] [107-1]; the motions of the Jane Does to intervene and to reconsider are granted to
09/03/1998	418	Yes: 32 Page(s); 1537 KB; PDF	STATEMENT OF Judicial Notice by movant Landmark Legal Foundation
09/11/1998	419	No	OBJECTIONS by Jane Doe to disclosure of information relating to her identity and testimony [417-1]
09/15/1998	420	Yes: 3 Page(s); 96 KB; PDF	NOTICE of appeal by plaintiff Paula Corbin Jones from District Court decision [417-1] (appeal fees paid) (2 certified copies to Clerk 8USCA), (cc: counsel)
09/16/1998	421	Yes: 6 Page(s); 227 KB; PDF	RESPONSE by President Clinton to Landmark Legal Foundation's Statement of Judicial Notice [418-1]

09/17/1998	422	No	CLERK'S MINUTES: in-camera hearing on 9/17/98, counsel advised that Court has received request for a copy of the President's video deposition of 1/17/98 from Henry Hyde, Judiciary Committee; without objection, Court advises itsintention in arranging for a copy of the video to be sent to the Chairman with a cover letter from Court advising that tape is in Court's custody for safekeeping, is acceding to request but will keep original (Reporter - Lois Lambert)
09/21/1998	--	No	DOCKETING LETTER: 8 USCA Number 98-3371; counsel to proceed on appendix
09/21/1998	423	Yes: 2 Page(s); 81 KB; PDF	REPLY by Landmark Legal to President Clinton's response to Landmark Legal Foundation's Statement of Judicial Notice [421-1]
09/21/1998	424	Yes: 5 Page(s); 181 KB; PDF	MOTION by media entities to vacate stay of the Court's Order of September 1, 1998
09/21/1998	425	Yes: 5 Page(s); 168 KB; PDF	MEMORANDUM by media entities in support of motion to vacate stay of the Court's Order of September 1, 1998 [424-1]
09/25/1998	426	Yes: 4 Page(s); 133 KB; PDF	PROTECTIVELY FILED ORDER of transcripts by plaintiff Paula Corbin Jones
10/06/1998	427	Yes: 3 Page(s); 97 KB; PDF	RESPONSE by plaintiff to motion to vacate stay of the Court's Order of September 1, 1998 [424-1]
10/08/1998	428	Yes: 5 Page(s); 207 KB; PDF	ORDER by Chief Judge Susan W. Wright, there being no objection from the parties to this case, the media entities' motion to vacate the stay [424-1] is granted and the Court will proceed to unseal the record as set forthabove and in the Court's September 1st, 1998, Memorandum and Order [417-1]; all court filings unsealed in accordance with today's decision, which incorporates the September 1st Memorandum and Order, will be posted on the Court's website beginning on Monday, October 19th, 1998, at the following address: www.arc.uscourts.gov; the Court cannot provide a
10/09/1998	429	Yes: 6 Page(s); 201 KB; PDF	ORDER by Chief Judge Susan W. Wright granting the media requests for access to a letter dated September 30, 1998 from Mr. Robert S. Bennett to this Court regarding the affidavit filed by Monica Lewinsky; although the lettersinvolve discovery matters currently under seal, neither counsel for plif nor counsel for the President object to their release (letters in their entirety attached) (cc: all counsel) EOD 10/9/98
10/16/1998	430	Yes: 4 Page(s); 143 KB; PDF	ORDER by Chief Judge Susan W. Wright, the purpose of today's Order is to explain the procedure for public access to the documents being released this Monday and in the coming weeks and to explain briefly what is not beingreleased at this time; the Court will release additional documents the following Monday, October 26, 1998 and any future releases will occur on suceeding Mondays in the same manner; regarding depositions of parties, the Court will permit the parties to release the transcripts of depositions and other materials only with court approval;
10/19/1998	431	No	SEALED document
10/22/1998	432	Yes: 2 Page(s); 60 KB; PDF	ORDER by Chief Judge Susan W. Wright, in accordance with previous Orders of this Court dated June 30th, 1998 [395-1], September 1st, 1998 [417-1], and October 8th, 1998 [428-1], the Court will unseal on Monday, October 26th,1998, a portion of the record that the Court determines (1) is unlikely to affect the parties' rights to a fair trial and/or (2) will not adversely affect the privacy interests of any Jane Does; documents being released this Monday will be posted on the Court's web site at 5:00am (CST); the Court's web site will have a direct link to the index of
10/22/1998	433	No	SEALED document
10/22/1998	434	No	SEALED document
10/27/1998	435	No	SEALED document

10/27/1998	436	No	SEALED document
10/29/1998	437	No	SEALED document
10/29/1998	438	No	SEALED document
10/29/1998	439	No	SEALED document
11/02/1998	440	No	SEALED document
11/04/1998	441	Yes: 2 Page(s); 70 KB; PDF	ORDER by Chief Judge Susan W. Wright, in accordance with previous Orders dated June 30, 1998 [395-1], September 1, 1998 [417-1], and October 8, 1998 [428], the Court will unseal on Monday, November 9th, 1998, a portion of thereord that the Court determines (1) is unlikely to affect the parties' right to a fair trial and/or (2) will not adversely affect the privacy interests of any Jane Does; the documents to be released on Monday include pleadings dealing with Jane Doe issues that, in some cases, have been heavily redacted; this release will take place in the same
11/17/1998	442	Yes: 16 Page(s); 699 KB; PDF	MOTION by Judicial Watch Inc in the public interest for leave to intervene to file amicus curiae brief to prevent dismissal
12/07/1998	443	Yes: 1 Page(s); 29 KB; PDF	MANDATE from 8 USCA dismissing the appeal on appellant's motion [420-1]
12/18/1998	444	Yes: 6 Page(s); 180 KB; PDF	JOINT MOTION by attys Joseph Cammarata and Gilbert K. Davis for attorney fees and for costs
12/22/1998	445	Yes: 3 Page(s); 83 KB; PDF	MOTION by deft Clinton for extension of time to respond to joint motion for fees and costs
12/29/1998	446	Yes: 3 Page(s); 86 KB; PDF	MOTION by plaintiff for extension of time to respond to joint motion for attorney's fees and costs
12/31/1998	447	Yes: 3 Page(s); 95 KB; PDF	RESPONSE by deft Danny Ferguson to joint motion for attys' fees [444-1] and costs [444-2]
01/04/1999	448	No	ORDER by Chief Judge Susan W. Wright granting motion for extension of time to respond to joint motion for attorney's fees and costs [446-1], [445-1], response due 1/15/99 (cc: all counsel)

IN THE SENATE OF THE UNITED STATES
Sitting as a Court of Impeachment

In Re	)
	)
Impeachment of	)
President William Jefferson Clinton	)

Factual Record

Errata Material to
Referral From Independent Counsel
Kenneth Starr
House Document 105-310

The United States
House of Representatives

HENRY J. HYDE
F. JAMES SENSENBRENNER, JR.
BILL McCOLLUM
GEORGE W. GEKAS
CHARLES T. CANADY
STEPHEN E. BUYER
ED BRYANT
STEVE CHABOT
BOB BARR
ASA HUTCHINSON
CHRIS CANNON
JAMES E. ROGAN
LINDSEY O. GRAHAM

Managers on the Part of the House

Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
(202) 514-8688
Fax (202) 514-8802

October 7, 1998

HAND DELIVERED

The Honorable Henry J. Hyde
Chairman, Committee on the Judiciary
2138 Rayburn House Office Building
Washington, DC 20515-6216

The Honorable John Conyers, Jr.
Ranking Minority Member,
Committee on the Judiciary
2138 Rayburn House Office Building
Washington, DC 20515-6216

Dear Chairman Hyde and Representative Conyers:

It has recently come to our attention that the Referral submitted by this Office on September 9, 1998 contains a citation error in footnote 890 of the Narrative section. The final citation clause in footnote 890 should read: "Compare Lewinsky 8/6/98 GJ at 187-89 (describing breakfast) with 942-DC-00000317 (Park Hyatt receipt reflecting breakfast described by Ms. Lewinsky)." A copy of the correct receipt, document number 942-DC-00000317, is attached to this letter.

Sincerely,

Robert J. Bittman
Deputy Independent Counsel

Attachment

942-DC-00000317

PARK HYATT - WASHINGTON, D.C
MELROSE

CHECK: 1127
TABLE: 7/1
SERVER: 102 PEDRO
DATE: DEC31'97 9:27AM
CARD TYPE: AMERICAN EXPRESS
ACCT #: 372807133183002
EXP DATE: 07/99
AUTH CODE: 573634
VE JORDAN

SUBTOTAL: 27.78

TIP: 6.—

TOTAL: 33.78

CUSTOMER SIGNATURE

I AGREE TO PAY ABOVE TOTAL AMOUNT ACCORDING TO CARD ISSUER AGREEMENT
* YELLOW IS CUSTOMER COPY

PARK HYATT - WASHINGTON, D.C
MELROSE
(202) 955-3899

102 PEDRO 2

7/1 1127 GST 1
DEC31'97 7:42AM

1	O. JUICE	3.75
2	COFFEE	5.00
1	OMELET	9.75
1	ENGLSH MUFFIN	4.00
1	HOT CEREAL	3.75
	FOOD SALES	25.25
	SERVICE CHARGES	4.00
	TAX	2.53
	TOTAL PAID	33.78
	$ CHARGE TIP	6.00
	372807133183002	07/99
	VE JORDAN	
	AMERICAN EXPRESS	33.78

704 CLOSED DEC31 9:47AM

Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, D.C. 20004
(202) 514-8688
Fax (202) 514-8802

January 5, 1999

VIA FACSIMILE

The Honorable Henry J. Hyde
Chairman, Committee on the Judiciary
2138 Rayburn House Office Building
Washington, DC 20515-6216

The Honorable John Conyers, Jr.
Ranking Minority Member,
Committee on the Judiciary
2138 Rayburn House Office Building
Washington, DC 20515-6216

Dear Chairman Hyde and Representative Conyers:

Attached please find an Errata sheet relating to the Referral submitted by this Office to the House on September 9, 1998. Where appropriate, the changes reflected on the errata sheet should be included in the final record.

Thank you for your cooperation. I apologize for any inconvenience.

Respectfully,

Robert J. Bittman
Deputy Independent Counsel

Enclosure

ERRATA

p. V, Key Dates, 10th entry	December 24, 1998, should be December 24, 1997
p. VI, Table of Names, Presidential Aides/Advisors/Assistants, 4th entry	Name should be Lanny Breuer
p. VIII, Table of Names, 4th entry under Monica Lewinsky's New York Employment Contacts	Entry should read: Richard Halperin, Executive Vice President and Special Counsel to the President of McAndrews & Forbes Holdings
p. VIII, Table of Names, 5th entry under Monica Lewinsky's New York Employment Contacts	Entry should read: Barbara Neysmith, Director for Office of the Chairman and Assistant Secretary for Director Relations
p. VIII, Table of Names, last entry under Monica Lewinsky's New York Employment Contacts	Douglas S. Willey should not be listed
p. VIII, Table of Names, ninth entry under Secret Service	Name should be Matthew Fritsch
p. IX, Table of Names, first entry	Name should be Gary Niedzwiecki
p. IX, Table of Names, fifth entry	Name should be Jeffrey Purdie
p. IX, Table of Names, Lawyers and Judges, first entry	Name should be Kirby Behre
p. 49, 1st line of text	April 16, 1996, should be April 19, 1996
p. 49, Section A, 1st line	April 16, 1996, should be April 19, 1996
p. 49, footnote 348	Add to beginning: 833-DC-00002812 (Pentagon email announcing appointment); 833-DC-00002731 (Ms. Lewinsky's Pentagon appointment affidavit)
p. 67, 8 lines from end of text	November 23, 1993, should be November 29, 1993
p. 104, footnote 890	916-DC-00000003 should be 942-DC-00000317