

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

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT ARKANSAS

PAULA CORBIN JONES,  
Plaintiff,  
v.  
WILLIAM JEFFERSON CLINTON  
and  
DANNY FERGUSON,  
Defendants.

:  
: OCT 30 1997  
: CIVIL ACTION  
: JAMES W. McCORMACK, CLERK. LR-C-94-290  
: By: [Signature]  
: DEP CLERK  
: Judge Susan Webber Wright

CONFIDENTIALITY ORDER ON CONSENT OF ALL PARTIES

WHEREAS, the Court has determined and counsel for all of the parties agree that this action is a matter in which there has been and will continue to be intense media interest and coverage due to the identity of the parties and the subject matter of this action; and

WHEREAS, the Court has determined and counsel for all parties agree that the interests of all parties and the judicial system in obtaining a fair and impartial jury and a fair trial for all parties will be prejudiced if the existing pre-trial publicity concerning discovery in this matter were permitted to continue; and

WHEREAS, the Court has determined and counsel for all parties agree that the interest in an impartial jury and a fair trial greatly outweigh any public interest in access to pre-trial information and proceedings in this matter; and

WHEREAS, the Court has determined and counsel for all parties agree that no reasonable alternative exists to protect the above-referenced interests;

IT IS HEREBY ORDERED, AND COUNSEL FOR ALL PARTIES CONSENT to the entry of the following confidentiality order to apply to the parties, counsel for the parties, and agents (including spokespersons) for the parties, prohibiting disclosure directly or indirectly of:

1. The time, place, or date on which any deposition is to be taken or the identity of any witness to be deposed; and
2. The content of any deposition, including but not limited to the questions asked, the answers given, whether any objections were made, the substance of any objections, the length of the deposition, whether the deposition went well or poorly, and whether new information was disclosed or old information confirmed; and
3. The content of any written discovery (interrogatories, document requests and requests for admission) sought from any party or third party, the identity of persons or entities from which information is sought, and the content of any responses thereto, including but not limited to the information sought, the responses given, documents produced, whether any objections were made, the substance of any objections, whether the information was helpful or not, and whether any new information was disclosed or old information confirmed.

IT IS HEREBY FURTHER ORDERED, AND COUNSEL FOR ALL PARTIES CONSENT that all materials, including motions and briefs, filed with the Court concerning discovery matters shall be filed under seal and the parties, counsel for the parties, and agents (including spokespersons) for the parties will not disclose the fact that any such filing has been made or any information concerning the content of such filings, responses thereto or resolution thereof;

IT IS HEREBY FURTHER ORDERED, AND COUNSEL FOR ALL PARTIES CONSENT that counsel for the parties will advise all third parties subject to subpoena, or who otherwise provide information in this case (including documents), of this Confidentiality Order.

SEEN AND AGREED TO:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Donovan Campbell, Jr., Esq.  
RADAR, CAMPBELL, FISHER & PYKE  
Stemmons Place, Suite 108  
2777 Stemmons Freeway  
Dallas, Texas 75207  
(214) 630-4700

COUNSEL TO PAULA JONES

Dated: \_\_\_\_\_

\_\_\_\_\_  
Robert S. Bennett, Esq.  
SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP  
1440 New York Avenue, N.W.  
Washington, D.C. 20005  
(202) 371-7000

COUNSEL TO  
PRESIDENT WILLIAM J. CLINTON

*Bill W. Bristow*  
\_\_\_\_\_  
Bill W. Bristow, Esq.  
216 East Washington  
Jonesboro, Arkansas 72401  
(870) 935-9000

COUNSEL TO DANNY FERGUSON

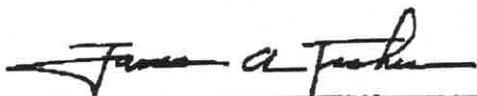
Dated: *October 30, 1997*

SO ORDERED this 30<sup>th</sup> day of October, 1997:

*Susan Webber Wright*  
\_\_\_\_\_  
Honorable Susan Webber Wright  
United States District Court



SEEN AND AGREED TO:



Dated: 10/30/97

~~Donovan Campbell, Jr., Esq.~~ James A. Fisher  
RADAR, CAMPBELL, FISHER & PYKE  
Stemmons Place, Suite 1080  
2777 Stemmons Freeway  
Dallas, Texas 75207  
(214) 630-4700

COUNSEL TO PAULA JONES



Dated: 10/30/97

Robert S. Bennett, Esq.  
SKADDEN, ARPS, SLATE, MEAGHER  
& FLOM LLP  
1440 New York Avenue, N.W.  
Washington, D.C. 20005  
(202) 371-7000


COUNSEL TO  
PRESIDENT WILLIAM J. CLINTON

Dated: \_\_\_\_\_

Bill W. Bristow, Esq.  
216 East Washington  
Jonesboro, Arkansas 72401  
(870) 935-9000

COUNSEL TO DANNY FERGUSON

SO ORDERED this 30<sup>th</sup> day of October, 1997:

  
Honorable Susan Webber Wright  
United States District Court

THIS DOCUMENT ENTERED ON DOCKET SHEET IN  
COMPLIANCE WITH RULE 58 AND/OR 79(a) FRCP  
ON 10/31/97 BY VT