

**DISCOVERY DEPOSITION SUMMARY OF WILLIAM JEFFERSON CLINTON
JANUARY 17, 1998**

| PAGE & LINE NUMBERS | TESTIMONY |
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| | KATHLEEN WILLEY |
| 2:1-3:12 | Met Willey in 1992 during his first presidential campaign. She volunteered to work at White House. Did not know her schedule. Did not read her deposition, only read a summary. |
| 3:14-48 | Did not know Willey's husband was missing until learning of his death. Called to express condolences. Does not recall asking staff member to let him know when she returned, but may have. |
| 3:50-4:33 | Denies kissing Willey and putting her hand on his genitalia. Admits that he embraced her and may have placed a kiss on her forehead in a non-sexual manner. Denies saying to her, "I wanted to do that for a long time." |
| 4:41-7:19 | Denies any conversation regarding Willey being put into a paying position within the White House. Denies knowledge of Willey's appointment to the delegation in Copenhagen in 1995. Acknowledges appointment to USO Board of Governors. No reason to believe she was untruthful, only one in-depth conversation with her. |
| 9:17-24 | Denies knowing if federal guidelines had changed in the time since the he signed the Arkansas sexual harassment policy as governor. |
| | MONICA LEWINSKY |
| 9:26-10:36 | Met Monica Lewinsky as an intern at the White House. Believes it was late 1995, does not know when she began working in office of legislative affairs. Denies speaking to anyone about getting her this job. Does not know when she began working for Department of Defense. |
| 10:38-13:48 | Acknowledges that when the Congress shut down the government, she was assigned to work in the chief of staff's office. May have been at same social functions. May have been alone in Oval Office or hallway to private kitchen, no recollection. |
| 14:5-28 | Betty Currie has been his secretary since becoming president. She typically works when he is working. Other staff is Nancy Hernreich and Janice Kearney. |
| 14:34-48 | Does not recollect ever meeting with Lewinsky between the hours of midnight and six a.m. Possible, but no recollection. |
| 15:24-49 | Denies knowledge of a record being created of a meeting between Lewinsky and Currie when in fact he was meeting with Lewinsky. |
| 16:1-17:21 | The last time he spoke to Lewinsky was shortly before Christmas. Said hello when she was visiting Currie. Did not tell him about subpoena in this case. Bruce Lindsey may have been the one to tell him about subpoena. Denies speaking to Lindsey about what type of action should be taken as a result. |
| 17:31-31 | Denies speaking to Lewinsky via telephone while on a recent trip to Bosnia. Denies asking anyone speak or meet with Lewinsky while on the trip to Bosnia |

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| 17:43-47 | Does not believe that anyone has reported to him a conversation that they had with Lewinsky regarding this lawsuit in the last two weeks. |
| 18:1-22 | Has known Vernon Jordan for a long time. Jordan met with Lewinsky to discuss move to New York. Currie told him of the meeting. |
| 18:34-19:17 | Knew that Lewinsky applied for a job at the U.N. Denies speaking to Bill Richardson, ambassador to the U.N., about Lewinsky, Currie may have. |
| 19:19-20:8 | Denies knowledge of any specific gifts that he may have given Lewinsky. |
| 20:10-22 | Lewinsky gave him a book or two and a tie. Denies receiving a silver cigar box. |
| 21:3-21 | Denies having an extramarital sexual affair or sexual relations with Lewinsky. |
| 21:23-22:14 | Spoke with Jordan about his conversation with Lewinsky regarding her move to New York. Recalls speaking to Jordan before he took office about Jordan's retirement from the state police. |
| 22:20-23:7 | Did not have any notes of any conversations with Buddy Young nor any state trooper other than Danny Ferguson, after becoming President. Asked Buddy Young if he knew anything about a meeting with Ferguson and others. Does not recall asking him to speak to any of them. |
| | JANE DOE 7 |
| 23:23-24:18 | Spent the night at a home owned by Jane Doe 7 in San Diego while he was president. One occasion possibly without his wife. Bruce Lindsey was there. Denies having sexual relations with Jane Doe 7 at any time or in any location. Does not believe that he was ever in a hotel room with Jane Doe 7. |
| | JANE DOE 2 |
| 24:20-25:44 | Does not recall when he appointed Jane Doe 2 to the position of Judge on the Arkansas Court of Appeals. Visited Jane Doe 2 at her home when her husband was not there. Could be 4 or 5 times over the course of 10 years. Denies having sexual relations with Jane Doe 2 at any location. |
| 26:24-27:19 | Recalls the day when he and Jane Doe 2 drove together in her Jaguar from the airport to the governor's mansion. |
| | JANE DOE 1 |
| 27:21-28:43 | Jane Doe 1 visited him at the governor's mansion, one time visited early AM on day of or day before move to Washington. Does not recall if Ferguson was there. Visit in basement room, does not believe anyone else was there. Prior meeting before Christmas, does not recall specifics of that visit. |
| 28:47-29:13 | Visited Jane Doe 1 at her apartment. |
| 29:35-31:2 | Admits to taking "action to try to prevent erroneous rumors from becoming public news" between the time when he decided to not run for president in the 1988 election and when he decided to run for president in 1992. |
| 31:25-28 | Admits that Interrogatory #1 is still true and correct. |
| | GENNIFER FLOWERS |
| 31:42-32:33 | Received two letters from Gennifer Flowers when she moved back to Arkansas. 1991 letter sent to Judy Gaddy. |

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| 32:35-33:44 | Flowers did get a job at the Arkansas Board of Review Appeals Tribunal. Does not remember having a conversation regarding Flowers with Don Barnes, Chairman of the Board of Review, or Randall Wright or with anyone associated with the Board of Review Appeals Tribunal. Does not remember having a conversation with Bill Gaddy about getting a job for Flowers. |
| 33:46-34:42 | Recalls a complaint regarding Flowers being filed with the State Grievance Review Committee. |
| 34:44-35:5 | Denies taking any trip out of Arkansas with Flowers. |
| 36:1-38:1 | Spoke to Dolly Kyle denying sexual relationship with Flowers at high school reunion. Marsha Scott listened and made notes which he kept in a briefcase under his desk in the White House or in his private office. They were inside a file folder with nothing else. Did not feel threatened. |
| 38:39-39:42 | Admits to having sexual relations with Flowers once in 1977. After she came back to Arkansas says she made sexual advances towards him. |
| 39:44-40:26 | Recalls seeing her one time in her apartment building. Denies going there with the intent of seeing Flowers. |
| 40:28-41:15 | May have asked Wright to speak with Ferguson. Admits to speaking with Ferguson himself about Ferguson making a public statement. Ferguson did not agree. |
| 41:17-20 | Does not believe that he ever left the governor's mansion by himself in a car or truck owned by one of the state troopers. |
| 41:22-46 | Denies knowing anything about a change in the procedure for logging visitors to the governor's mansion or to the phone logs while he was governor. |
| 41:48-42:38 | Recalls going to the Brown Palace in Denver. Recalls a trip to Portland, Maine with his family. Does not recall if L.D. Brown was on either trip. Denies asking a state trooper to get the name and phone number of a woman that he had seen during either trip. |
| 42:40-47 | Knows Cathy Ford. Denies asking her to talk to Brown about keeping quiet. Says that he may have asked somebody to ask Brown to not lie. |
| 42:49-43:3 | Does not recall a conversation with Kyle regarding her sexual addiction. |
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| | CROSS EXAMINATION BY BILL BRISTOW (Attorney for co-defendant, Danny Ferguson) |
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| | PAULA JONES |
| 43:24-45 | Denies ever having an agreement or conspire with Danny Ferguson to violate the rights of Paula Jones or to bring her to Clinton. Believes that if he and Ferguson had such an agreement, it would be something that he would remember. |
| 43:47-44:35 | Admits that many people want to meet him. May not remember everyone that he has met. |

Denise O'Connor
PLGL 1200 – Civil Litigation

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| | CROSS EXAMINATION BY ROBERT BENNETT |
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| 45:3-16 | Acknowledges that the read portion of Lewinsky's affidavit was correct to his knowledge. |