

Timothy J. Herman
Email:
Direct dial:

July 9, 2012

Via Email

William Bock, III
General Counsel
United States Anti-Doping Agency
555 Tech Center Drive, Suite 200
Colorado Springs CO 80919

RE: Lance Armstrong vs. USADA and Travis Tygart

Dear Bill:

This letter will confirm our conversation this morning in which I requested USADA to agree to a standstill in order to allow the court and the parties an opportunity to consider and resolve the issues in the above referenced matter in a considered and orderly manner. I indicated that I would not seek any *ex parte* temporary relief until we conferred and you reviewed our pleadings which have been emailed to you. I requested that you respond by 2:00 pm today, given the circumstances. You indicated that you thought that to be impractical, even though the only issue would be a minimum standstill of 14 days.

I further indicated that in the event we were unable to agree, I would insure that your comments and position would be accurately related to the court and that I felt sure the court would want to have your input before granting any relief. Given the immense harm to befall Armstrong in the event no temporary relief is forthcoming and the corresponding absence of harm to USADA, I hope that USADA will agree and avoid the necessity of further judicial intervention.

Very truly yours

Timothy J. Herman

TJH/ll