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*Preserving the integrity of competition. Inspiring true sport. Protecting the rights of athletes.*

VIA ELECTRONIC MAIL TO [REDACTED]

July 27, 2012

Tim Herman  
HOWRY BREEN & HERMAN, LLP  
1900 Pearl Street  
Austin, Texas 78705-5408

**Re: *Lance Armstrong v. United States Anti-Doping Agency (“USADA”), et al.,  
Cause No. 1:12-cv-00606-SS  
Defendants’ Discovery Request***

Dear Tim:

On July 24 and July 25, 2012, I made written requests to the Plaintiff for all documents which Plaintiff contends evidence any contract which Plaintiff claims to have had with UCI. In response I received the following from you in your letter of yesterday:

With respect to Mr. Armstrong's contracts with UCI, as you know, Mr. Armstrong is a UCI-license holder. His UCI licenses constitute his contracts with UCI. I assume you need nothing further, since it is your position that you need no evidence for your motion other than what you have already submitted.

Please confirm if, as it appears from your statement above, Plaintiff is refusing to produce the documents requested – which documents you and your partner Sean Breen have told me you believe are relevant to Plaintiff’s response to USADA’s jurisdictional motion.

In response to your statement that you “assume” that I did not wish you to produce the documents I had twice previously requested in writing, I will attempt to remove any ambiguity on this issue by requesting these documents for a third time: **USADA again demands production of all documents which Plaintiff claims evidence any contract Plaintiff claims to have had with UCI.**

With respect to your statement that your assumption was based on an alleged position that USADA “need[s] no evidence for your motion other than what you have already submitted,” I am puzzled. That is not a statement I have made. What I have said is that it is the Plaintiff not USADA who carries the burden of proof to establish jurisdiction. Therefore, USADA is certainly entitled to all evidence that Plaintiff will rely upon to assert that subject matter jurisdiction exists.

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***United States Anti-Doping Agency***

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Please clarify as soon as possible whether you will produce the requested documents or are refusing to do so.

Finally, I note the statement in the present tense in your letter that, "Mr. Armstrong is a UCI-license holder." Is it Plaintiff's position that he is currently a UCI-license holder?

Kind regards,

UNITED STATES ANTI-DOPING AGENCY

A handwritten signature in blue ink, which appears to read "William Bock, III". The signature is fluid and cursive, with a large initial "W" and "B".

William Bock, III  
General Counsel

WB/ljm