

DEPOSITION OF WARREN GIBSON

Taken on March 17, 2009

LEMOND CYCLING, INC. -VS- TREK BICYCLE
CORPORATION

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COMPLIMENTARY CONDENSED

Advantage Reporting

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1 and -- as Greg was of his successes, and I felt that
2 Greg was initially doing this as just pure jealousy
3 just from knowing him over the years.

4 Q. Right.

5 A. He had certainly been on the campaign trail
6 about that ever since, so...

7 Q. Were you aware in the summer of 2001 that
8 Mr. John Burke at Trek had called up Greg and tried to
9 mediate the dispute between Greg LeMond and Lance
10 Armstrong?

11 A. Yes.

12 Q. And how did you know that?

13 A. Greg told me about it.

14 Q. Did Greg tell you whether he had secretly
15 taped Mr. Burke?

16 A. Yes, he did.

17 Q. What did he say?

18 A. Well, he indicated that he had tapes that --
19 if there was at any time that Trek wanted to terminate
20 his relationship, that he had tapes that would
21 incriminate John Burke and that he felt that they were
22 powerful enough that they -- you know, that Trek would
23 not terminate him.

24 Q. Do you have any understanding that Greg was
25 going to use tapes for leverage against Trek?

1 MS. RAHNE: Object to the form.

2 Go ahead.

3 THE WITNESS: That was his intention.

4 Q. BY MR. WEBER: And what do you base that on,
5 something he said or something else?

6 A. No. Purely what he told me.

7 Q. In 2004 there was an additional round of
8 publicity associated with some of Mr. Lemond's comments
9 against Mr. Armstrong. Were you aware of consumer
10 reaction to those comments?

11 A. We had a website and -- at that time with a
12 bulletin board, and the bulletin board had an
13 overwhelming amount of comments on the bulletin board.

14 Q. And did Mr. LeMond ask you to do anything
15 with the bulletin board?

16 A. He asked to have the bulletin board shut
17 down.

18 Q. Did he say why?

19 A. He didn't care for the negative comments that
20 were coming out on the bulletin board about him.

21 Q. Were you aware that in August of 2004 Trek
22 sent Mr. LeMond a notice of breach of contract?

23 A. I was aware of that.

24 Q. And were you asked to do anything in terms of
25 trying to find a new business partner for Mr. LeMond?