

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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LEMOND CYCLING, INC.,

Plaintiff,

Case No.

-against-

08-CV-01010

TREK BICYCLE CORPORATION,

(RHK/JSM)

Defendant/Third-Party Plaintiff,

-against-

GREG LEMOND,

Third-Party Defendant.

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May 7, 2009

9:33 a.m.

Deposition of IRA LANGER, held at
the offices of Foley & Lardner LLP, 90 Park
Avenue, New York, New York, pursuant to
Subpoena, before Mildred Cassese, a
Registered Professional Reporter and Notary
Public of the State of New York.

1 I. Langer

2 Greg before you started distributing or selling
3 promotional items?

4 MR. WEBER: Object as to foundation.

5 Q. If you can remember.

6 MR. WEBER: Of this witness'
7 knowledge of what the contract required.

8 Q. You can answer that if you remember.

9 A. My only recollection would be after
10 reading this, and I don't know -- I think it was
11 more a courtesy than anything else.

12 Q. Some information there at the top
13 that's redacted, and I'll just represent to you
14 that it was forwarded to Mr. Burns.

15 Do you have any idea why it was
16 forwarded to Mr. Burns?

17 A. No.

18 DI MR. WEBER: Objection. You're
19 invading attorney-client privilege. You're
20 using the privilege log exactly as we had
21 discussed should not be used, and instruct
22 the witness not to answer.

23 Could you mark this? We're going to
24 need to go back to it later.

25 (Discussion off the record)