

Trek Bicycle Corporation's Privilege Log¹
For Fully Withheld Documents—THIRD REVISED 05/07/09
LeMond Cycling, Inc. v. Trek Bicycle Corporation v. Greg LeMond
Case No. 08-1010 (United States District Court, District of Minnesota)

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000001	03/21/08	Email	Bob Burns	Ralph Weber Lisa Smith		Confidential Attorney - Attorney communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000001	03/21/08	Email	Brent Leland	Bob Burns	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000002- TREK PRIV 000003	03/21/08	Email	Bob Burns	Joe Siefkes Brent Leland Dean Gore Tim Calahan Joe Vadeboncoeur Aaron Mock Malcolm Davies Roger Gierhart Cindy Wagner John Burke	Amy Davison	Confidential Attorney - Client communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000002- TREK PRIV 000003	03/21/08	Email	Tim Calahan	Steve Malchow Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000002- TREK PRIV 000003	03/21/08	Email	Bob Burns	Lisa Smith		Confidential Attorney - Client communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000004- TREK PRIV 000005	03/21/08	Email	Bob Burns	Lisa Smith		Confidential Attorney - Client communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000004- TREK PRIV 000005	03/21/08	Email	Cindy Wagner	Maureen Muldoon	Bob Burns	Confidential Client - Attorney and Attorney - Client communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000006- TREK PRIV 000008	03/21/08	Letter	Ralph Weber	Bob Burns		Confidential Attorney - Attorney communication for the purpose of legal advice re preservation of information.	ACP, WP
TREK PRIV 000009	03/21/08	Email	Ralph Weber	Bob Burns		Confidential Attorney - Attorney communication for the purpose of legal advice re record hold.	ACP, WP

¹ Trek's privilege log does not include litigation-related privileged documents created since LCI's March 2008 lawsuit, other than the record hold documents noted on 3/21/08.

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000009- TREK PRIV 000010	03/21/08	Email	Bob Burns	Ralph Weber	Amy Davison	Confidential Attorney - Attorney communication for the purpose of legal advice re record hold.	ACP, WP
TREK PRIV 000011	02/19/08	Email	Bret Gave	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000012	01/24/08	Notes	Bob Burns			Confidential Attorney notes re communication with J. Burke for the purpose of Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000013- TREK PRIV 000047	2008	Notes	Bob Burns			Confidential Attorney notes throughout copy of Sublicense Agreement and First Amendment, for the purpose of legal advice re Trek-LeMond contractual relationship.	WP
TREK PRIV 000048	01/17/08	Email	Bob Burns	Joe Vadeboncoeur John Riley Aaron Mock Dean Gore Paul Moran Laurie Koch Roger Gierhart John Balmer Scott Daubert Ben Coates Mark Joslyn Joe Siefkes Pat Sullivan Amy Davison	John Burke	Confidential Attorney - Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000049	01/17/08	Notes	Bob Burns			Confidential Attorney notes re telephone call for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	WP
TREK PRIV 000050	10/22/04	Notes	Loren Brown			Confidential Attorney designation of recipients of 10/22/04 letter from Loren Brown to Sidney Bluming.	ACP, WP
TREK PRIV 000051	01/2008	Notes	Bob Burns			Confidential Attorney notes re communication with J. Siefkes for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000052- TREK PRIV 000061	08/29/06	Memo	Kristal Stippich	Chris Dombrowicki		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
				Ralph Weber			
TREK PRIV 000062	02/21/08	Email	Jenelle Thurnbauer	Paul Moran		Confidential Client communication forwarding data compilation at the request of Attorney for the purpose of legal advice re Trek's response to S. Bluming 1/16/08 letter.	ACP, WP
TREK PRIV 000062	02/21/08	Email	Paul Moran	Bob Burns		Confidential Client – Attorney communication forwarding data compilation from J. Thurnbauer for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000062	02/21/08	Email	Bob Burns	Jenelle Thurnbauer		Confidential Attorney – Client communication re data compilation for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000062- TREK PRIV 000076	02/22/08	Email	Jenelle Thurnbauer	Bob Burns		Confidential Client - Attorney communication and attached data compilation for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000077	02/19/08	Emails	Bob Burns Mike Hietpas	Mike Hietpas Bob Burns		Confidential Attorney - Client and Client - Attorney communications re data compilation for the purpose of legal advice re response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000077- TREK PRIV 000148	02/18/08	Email	Mike Hietpas	Bob Burns		Confidential Client communication forwarding attached data compilation from P. Zimmer for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000077- TREK PRIV 000148	02/18/08	Email	Parker Zimmer	Mike Hietpas		Confidential Client communication and attached data compilation at request of Attorney for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000149	02/20/08	Notes	Bob Burns			Confidential Attorney notes re communication with J. Siefkes for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000150	02/13/08	Email	John Burke	Bob Burns Cindy Wagner		Confidential Client - Attorney communication for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000150	02/13/08	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000151	2008	Notes	Elisabeth Huber Bob Burns	Bob Burns		Confidential Client data and notes and Attorney notes for the purpose of legal advice re Trek's response to S. Bluming's 1/16/08 letter.	ACP, WP
TREK PRIV 000152- TREK PRIV 000153	02/14/08	Email	Aaron Mock	Bob Burns		Confidential Client – Attorney communication and research done at request of Attorney for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000154	01/14/08	Email	Bob DeWit	Malcolm Davies David VanDyck	Bob Burns	Confidential Client - Attorney communication re LeMond interview for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000155- TREK PRIV 000157	11/28/07	Email	Bob Burns	Lisa Smith		Forwarding B. DeWit's 11/28/07 confidential Client - Attorney communication and attachment for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000155- TREK PRIV 000157	11/28/07	Email	Bob DeWit	Bob Burns Malcolm Davies	David Van Dyck	Confidential Client - Attorney communication re LeMond interview and attached translation for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000158	11/04/04	Fax	Ralph Weber	Bob Burns		Confidential Attorney - Attorney fax cover sheet communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000159	05/23/07	Email	Bob Burns	Lisa Smith		Forwarding L. Koch's 5/23/07 confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000159	05/23/07	Email	Laurie Koch	Bob Burns		Forwarding J. Grotjahn's 5/23/07 confidential communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000159	05/23/07	Email	Jeff Grotjahn	Laurie Koch	Jason Schumacher	Confidential Client –Client communication providing LeMond document for Attorney for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000160- TREK PRIV 000162	11/20/07	Email	Cindy Wagner	Bob Burns	John Burke	Confidential Client - Attorney communication forwarding J. Burke confidential communication to B. Burns re LeMond meeting for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000160- TREK PRIV 000162	11/26/07	Email	Bob Burns	Lisa Smith		Forwarding C. Wagner's 11/20/07 confidential Client - Attorney communication for the purpose	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						of legal advice re Trek-LeMond contractual relationship.	
TREK PRIV 000163	08/17/07	Notes	Bob Burns			Confidential notes re telephone call with J. Burke for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000164- TREK PRIV 000167	08/2006	Notes	Bob Burns			Confidential Attorney notations throughout 08/01/06 email from Sidney Bluming to Bob Burns re LeMond/Trek.	WP
TREK PRIV 000168	07/28/06	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re response to S. Bluming re public feedback re LeMond comments.	ACP, WP
TREK PRIV 000169- TREK PRIV 000174	07/29/06	Email; Draft Letter	Bob Burns	John Burke		Confidential Attorney - Client email and attached draft letter to S. Bluming re public feedback re LeMond comments.	ACP, WP
TREK PRIV 000175						PRODUCED, TREK 000633 and TREK 009666.	
TREK PRIV 000176- TREK PRIV 000181						PRODUCED, TREK 013842-013847.	
TREK PRIV 000182- TREK PRIV 000183	06/28/06	Email	Joe Siefkes	Bob Burns		Confidential Client - Attorney communication and attached data compilation for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000184- TREK PRIV 000185	2006	Draft; Notes	Bob Burns	John Burke		Confidential Attorney – Client communication and handwritten notes for the purpose of legal advice re draft letter re public feedback re LeMond comments.	ACP, WP
TREK PRIV 000186	03/07/07	Email	Bob Burns	John Burke	Dean Gore	Confidential Attorney - Client communication for the purpose of legal advice re draft response to LeMond.	ACP, WP
TREK PRIV 000186	03/07/07	Email	Bob Burns	Lisa Smith		Forwarding B. Burns' 03/07/07 confidential Attorney - Client communication for the purpose of legal advice re draft response to LeMond.	ACP, WP
TREK PRIV 000187	04/11/05	Email	Malcolm Davies	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek's response to S. Bluming.	ACP, WP
TREK PRIV 000188- TREK PRIV 000193	07/11/06		Malcolm Davies	Bob Burns		Confidential Client - Attorney data compilation for the purpose of legal advice re Trek's response to S. Bluming.	ACP, WP
TREK PRIV 000194- TREK PRIV 000195	11/07/06	Outline	Malcolm Davies	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re Trek's response to S.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						Bluming.	
TREK PRIV 000196	04/04/05	Email	Malcolm Davies	Bob Burns Loren Brown		Confidential Client – Attorney communication for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000196- TREK PRIV 000197	03/10/05	Email	Bob Burns	Dick Moran Malcolm Davies Joe Vadeboncoeur		Confidential Attorney - Client communication for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000198- TREK PRIV 000200	03/29/05	Email	Patsy Tully	Bob Burns Malcolm Davies Joe Vadeboncoeur		Confidential Client - Attorney communication and attached data compilation for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000201	03/23/05	Email	Bob Burns	Philip McGlade		Confidential Attorney - Client communication for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000201	03/22/05	Email	Philip McGlade	Bob Burns	Patsy Tully	Confidential Client - Attorney communication for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000202- TREK PRIV 000207	2005		Trek Employee	Bob Burns		Confidential Client various data compilations for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000208	03/10/05	Email	Dean Gore	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000209- TREK PRIV 000213	01/13/05	Email	Bob Burns	Lisa Smtih		Forwarding confidential 01/13/05 email and attached data compilation from D. DeMarb for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000209- TREK PRIV 000213	01/13/05	Email	Denise DeMarb	Bob Burns	Joe Siefkes	Confidential Client - Attorney communication, attached data compilation, and embedded emails from P. McGlade to D. DeMarb (undated), 1/12/05 email D. DeMarb to D. Van Dyck, M. Davies, N. Roberts, P. McGlade (cc to P. Allen and B. De Vries), 1/11/05 email from D. DeMarb to S. Radewan (cc B. Burns) incorporating email from B. Burns to D. DeMarb (undated), for the purpose of legal advice re Trek’s response to S. Bluming.	ACP, WP
TREK PRIV 000214- TREK PRIV 000217	07/23/04	Email	Jennifer Basoa Loren Brown Bob Burns	Loren Brown Bob Burns Lisa Smith		Confidential Attorney - Attorney communications for the purpose of legal advice re communication with LeMond.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000218	07/23/04	Email	Loren Brown	Bob Burns	Lisa Smith	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000218	07/23/04	Email	Jennifer Basoa	Loren Brown		Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000219	07/20/04	Email	Dave Maurer	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re public feedback re LeMond comments.	ACP, WP
TREK PRIV 000219	07/20/04	Email	Bob Burns	Dave Maurer John Burke		Confidential Attorney - Client communication for the purpose of legal advice re public feedback re LeMond comments	ACP, WP
TREK PRIV 000219	07/20/04	Email	Dave Maurer	Bob Burns John Burke		Confidential Client - Attorney communication for the purpose of legal advice re public feedback re LeMond comments.	ACP, WP
TREK PRIV 000220	07/16/04	Email	Dan Titus	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re public feedback re LeMond comments.	ACP, WP
TREK PRIV 000221	05/18/06	Email	Bob Burns	Malcolm Davies	Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000221	05/17/06	Email	Malcolm Davies	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000222	06/10/05	Email	Bob Burns	Loren Brown	Lisa Smith	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000222	06/10/05	Email	Loren Brown	Bob Burns	Lisa Smith	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000223	05/10/05	Email	Bob Burns	Lisa Smith		Forwarding 5/10/05 confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000223	05/10/05	Email	Bob Burns	John Burke Dick Moran		Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000224	05/10/05	Email	Dick Burke	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000224	05/10/05	Email	Bob Burns	Dick Burke		Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000225	04/29/05	Email	Steve Swenson	Bob Burns Dean Gore		Confidential Client – Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000226	04/19/05 04/14/05	Email	Philip McGlade Bob Burns	Bob Burns Philip McGlade Malcolm Davies	Dean Gore	Confidential Client – Attorney and Attorney - Client communications for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000227- TREK PRIV 000229	2005	Notes	Bob Burns			Confidential Attorney handwritten notes re J. Burke communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000230	04/04/05	Draft Memo	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000231- TREK PRIV 000234	04/04/05	Draft Memo	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000235- TREK PRIV 000236	03/10/05	Email	Bob Burns Loren Brown	Loren Brown Bob Burns		Confidential Attorney - Attorney communications for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000237- TREK PRIV 000240	03/21/05	Memo	Loren Brown	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000241	02/25/05	Email	Dick Burke	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000241- TREK PRIV 000242	02/25/05	Email	Bob Burns	Dick Burke John Burke	Joe Siefkes	Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000243- TREK PRIV 000244	02/21/05	Email	Rachel Geschwind	Bob Burns	Loren Brown	Confidential Attorney - Attorney communication for the purpose of legal advice LeMond.	ACP, WP
TREK PRIV 000243- TREK PRIV 000249	02/22/05	Email; Draft	Bob Burns	Loren Brown	Rachel Geschwind	Confidential Attorney - Attorney communication and draft for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000250	02/21/05	Email	Bob Burns	Dick Burke	John Burke Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000250	02/21/05	Email	Dick Burke	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000250	02/20/05	Email	Dick Burke	Bob Burns		Confidential Client - Attorney communication for	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						the purpose of legal advice re negotiations with LeMond.	
TREK PRIV 000250- TREK PRIV 000251	02/18/05	Email	Bob Burns	Dick Burke John Burke Joe Siefkes		Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000252	02/11/05	Email	Loren Brown	Bob Burns		Confidential Attorney - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000253- TREK PRIV 000259	02/16/05	Email; Draft	Loren Brown	Bob Burns	Rachel Geschwind	Confidential Attorney - Attorney communication and draft for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000260- TREK PRIV 000265	02/07/05	Draft	Bob Burns			Confidential draft Second Amendment for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000266	2005	Notes	Bob Burns			Confidential Attorney handwritten notes for the purpose of legal advice re draft and re negotiations with LeMond.	ACP, WP
TREK PRIV 000267- TREK PRIV 000268	02/03/05	Email	Bob Burns	John Burke Joe Siefkes		Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000269- TREK PRIV 000270	02/2005	Draft	Bob Burns			Confidential draft letter to Sidney Bluming for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000271- TREK PRIV 000276	02/03/05	Draft	Bob Burns			Confidential draft Second Amendment for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000277	01/28/05	Email	Dick Burke	Bob Burns	John Burke Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000277- TREK PRIV 000278	01/28/05	Email	Bob Burns	Dick Burke	Joe Siefkes John Burke	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000278	01/28/05	Email	Dick Burke	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000279	2005		Anne Marie	Joe Siefkes		Confidential Client data compilation at behest of Attorney with handwritten notes for the purpose of legal advice re negotiations with LeMond.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000280	01/31/05	Email	Bob Burns	Dick Burke John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000280	01/31/05	Email	Dick Burke	Bob Burns John Burke	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000281	01/30/05	Email	Dick Burke	Bob Burns John Burke	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000281	01/30/05	Email	Bob Burns	John Burke	Joe Siefkes Dick Burke	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000282- TREK PRIV 000286	01/30/05	Email; Draft	Bob Burns	John Burke	Dick Burke Joe Siefkes	Confidential Attorney - Client communication and draft letter to Sidney Bluming for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000287	2005	Notes	Trek Employee	Bob Burns		Confidential Client data compilation at behest of Attorney with handwritten notes, for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000288	01/21/05	Email	Bob Burns	John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000289- TREK PRIV 000291	01/24/05	Memo	Loren Brown	Bob Burns		Confidential Attorney - Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000292	2005	Draft	Bob Burns			Confidential draft to Sidney Bluming, for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000293	01/20/05	Notes	Bob Burns			Confidential Attorney notes re telephone call with Sidney Bluming, for the purpose of legal advice re negotiations with LeMond.	WP
TREK PRIV 000294- TREK PRIV 000295	01/12/05	Email	Bob Burns	Lisa Smith		Forwarding 1/11/05 confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000294- TREK PRIV 000295	01/11/05	Email	Curtis Dresen	Bob Burns		Confidential Client - Attorney communication and attached data compilation for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000296	01/11/05	Email	Cindy Wagner Bob Burns	Bob Burns Lisa Smith		Confidential Client - Attorney and Attorney - Client communication for the purpose of legal advice re LeMond.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000297	01/11/05		Philip McGlade Denise DeMarb	Bob Burns		Confidential Client data compilation at request of Attorney for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000298- TREK PRIV 000299	01/13/05	Email	Bob Burns	Lisa Smith		Forwarding 1/12/05 and 1/13/05 confidential Client - Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000298- TREK PRIV 000299	01/13/05 01/12/05	Email	Bob Burns Gene DiMenna	Gene DiMenna Bob Burns		Confidential Attorney - Client and Client-Attorney communications re LeMond dealer for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000300- TREK PRIV 000301	01/15/05	Notes	Bob Burns			Confidential Attorney handwritten notes for the purpose of legal advice re communication with S. Bluming and negotiations with LeMond.	ACP, WP
TREK PRIV 000302	01/11/05	Email	Bob Burns	Joe Siefkes Denise DeMarb		Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000302- TREK PRIV 000303	01/11/05	Email	Denise DeMarb	Bob Burns Joe Siefkes		Confidential Client - Attorney communication and attached data compilation for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000304- TREK PRIV 000305	01/13/05	Draft	Bob Burns			Confidential Attorney draft letter to Sidney Bluming, for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000306	01/07/05	Email	Dick Burke	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000306	01/07/05	Email	Bob Burns	Dick Burke	John Burke Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000307- TREK PRIV 000308	01/04/05	Email; Draft	Bob Burns	Dick Burke	John Burke Joe Siefkes	Confidential Attorney - Client communication and attached draft to S. Bluming for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000309	01/04/05		Bob Burns	John Burke Joe Siefkes		Confidential Attorney outline communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000310	2005	Notes	Bob Burns			Copy of LeMond with Trek - "Gag" Agreement Clause with confidential Attorney handwritten notations, for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000311	2005	Draft	Bob Burns			Confidential draft letter to Sidney Bluming, for the	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						purpose of legal advice re negotiations with LeMond.	
TREK PRIV 000312	12/29/04	Email	Lisa Smith	Bob Burns		Confidential communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000312- TREK PRIV 000313	12/29/04	Email	Bob Burns	John Burke Joe Siefkes	Dick Burke	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000314- TREK PRIV 000315						PRODUCED, TREK 013357-58	
TREK PRIV 000316	12/20/04	Notes	Bob Burns			Confidential Attorney handwritten notes re communication with J. Burke for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000316	12/28/04	Notes	Bob Burns			Confidential Attorney handwritten notes re communication with J. Burke for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000317- TREK PRIV 000318	12/17/04	Email	Bob Burns	John Burke Dick Burke Joe Siefkes		Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000319	12/17/04	Email	Dick Burke	Bob Burns John Burke Joe Siefkes		Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000320	12/22/04	Email	Bob Burns	Loren Brown Ralph Weber		Confidential Attorney - Attorney communication for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000321	12/16/04	Email	Bob Burns	Dick Burke John Burke Joe Siefkes	Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000322- TREK PRIV 000323	12/16/04	Notes	Bob Burns			Confidential Attorney handwritten notes re communication with C. Madel, S. Bluming and L. Brown for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000324	10/22/04	Notes	Loren Brown			Confidential Attorney designation of recipients for 10/22/04 letter to Sidney Bluming.	ACP, WP
TREK PRIV 000325- TREK PRIV 000326	10/27/04	Email	Bob Burns	John Burke	Joe Siefkes Loren Brown	Confidential Attorney - Client communication for the purpose of legal advice re meeting with G. LeMond and his attorneys.	ACP, WP
TREK PRIV 000327	01/21/05	Email	Bob Burns	Loren Brown Ralph Weber	Lisa Smith	Confidential Attorney - Attorney communication for the purpose of legal advice re communication	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						with LeMond.	
TREK PRIV 000328	01/10/05	Email	Bob Burns	Pat Sullivan Dick Moran Dean Gore Tonja Green Katie Ishmael Brad Wagner	Joe Vadeboncoeur	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond..	ACP, WP
TREK PRIV 000329	01/12/05	Email	Bob Burns	John Burke	Joe Siefkes Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000330	01/12/05	Email	Lisa Smith	Loren Brown		Confidential Attorney - Client communication for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000331- TREK PRIV 000332	12/15/04	Memo	Loren Brown	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000333- TREK PRIV 000334	12/14/04	Memo	Loren Brown	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000335- TREK PRIV 000336	12/14/04	Notes	Bob Burns			Confidential Attorney handwritten notes for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000337- TREK PRIV 000338	12/14/04	Memo	Ralph Weber	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000339	12/13/04	Email	Bob Burns	Dick Burke John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000339	12/13/04	Email	Dick Burke	Bob Burns John Burke	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000340	12/13/04	Email	Dick Burke	Bob Burns John Burke	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000340- TREK PRIV 000342	12/12/04	Email	Bob Burns	Dick Burke John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000343	12/10/04	Email	Loren Brown Rachel Geschwind	Bob Burns Ralph Weber Rachel Geschwind		Confidential Attorney - Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000343	12/10/04	Email	Bob Burns	Lisa Smith		Forwarding 12/10/04 confidential Attorney - Attorney communications for the purpose of legal	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						advice re LeMond.	
TREK PRIV 000344	12/10/04	Memo	Loren Brown	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000345	12/10/04	Email	Bob Burns	Ralph Weber Loren Brown		Confidential Attorney – Attorney communication for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000346- TREK PRIV 000347	12/10/04	Email	Bob Burns	Loren Brown Ralph Weber		Confidential Attorney - Attorney communication for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000348	12/10/04	Memo	Loren Brown	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000349	12/02/04	Email	Bob Burns	Lisa Smith		Forwarding 11/29/04 confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000349	11/29/04	Email	Jennifer Basoa	Bob Burns		Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000350	11/16/04	Email	Bob Burns	Doug Kotulski		Confidential Attorney - Client communication for the purpose of legal advice re document preservation.	ACP, WP
TREK PRIV 000351- TREK PRIV 000356	11/03/04	Memo	Ralph Weber	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000357	11/04/04	Email	Elisabeth Huber	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000358			Trek Employee	Bob Burns		Confidential Client data compilation for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000359	10/27/04	Email	Bob Burns	Lisa Smith		Forwarding 10/27/04 confidential Attorney - Client communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000359- TREK PRIV 000360	10/27/04	Email	Bob Burns	John Burke	Joe Siefkes Loren Brown	Confidential Attorney - Client communication for the purpose of legal advice re meeting with G. LeMond and his attorneys.	ACP, WP
TREK PRIV 000361	10/27/04	Email	Bob Burns	John Burke	Lisa Smith Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re meeting with G. LeMond and his attorneys.	ACP, WP
TREK PRIV 000362-	10/27/04	Notes	Bob Burns			Confidential Attorney handwritten notes for the	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000364						purpose of legal advice re meeting with G. LeMond and his attorneys.	
TREK PRIV 000365	10/22/04	Email	Dick Burke	John Burke Bob Burns	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming email.	ACP, WP
TREK PRIV 000365	10/21/04	Email	Bob Burns	Dick Burke John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re response to S. Bluming email.	ACP, WP
TREK PRIV 000366	10/06/04	Fax	Bob Burns	Loren Brown		Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000367	10/06/04	Fax	Bob Burns	Ralph Weber		Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000368	10/01/04	Email	Bob Burns	Lisa Smith		Forwarding 10/1/04 confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000368	10/01/04	Email	Maureen Muldoon	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000369	10/01/04	Email Notes	Bob Burns	Lisa Smith		Forwarding 10/1/04 confidential Client - Attorney communication and handwritten notes for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000369	10/01/04	Email	Aaron Mock	Bob Burns	Dean Gore	Confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000370	09/27/04	Email Notes	Dean Gore	Bob Burns		Confidential Client - Attorney communication handwritten notes for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000371	09/27/04	Email	Dean Gore	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000371	09/27/04	Email	Bob Burns	Lisa Smith		Forwarding 9/27/04 confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000372	09/28/04	Letter	Bob Burns	Christopher Dombrowicki	Ralph Weber	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000373	09/26/04	Email	John Burke	Joe Siefkes	Bob Burns	Confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000373	09/23/04	Email	Joe Siefkes	Bob Burns	John Burke	Confidential Client - Attorney communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000373	09/23/04	Email	Bob Burns	Joe Siefkes John Burke		Confidential Attorney - Client communication for the purpose of legal advice re response to S. Bluming.	ACP, WP
TREK PRIV 000374	09/27/04	Email	Bob Burns	Dick Burke		Confidential Attorney - Client communication for the purpose of legal advice re meeting with G. LeMond.	ACP, WP
TREK PRIV 000374	09/27/04	Email	Dick Burke	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re meeting with G. LeMond.	ACP, WP
TREK PRIV 000375	09/21/04	Notes	Bob Burns			Confidential Attorney handwritten notes re telephone call with Trek Attorney for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000376- TREK PRIV 000379	09/17/04	Email	Bob Burns Ralph Weber Loren Brown	Bob Burns Ralph Weber Loren Brown	Lisa Smith	Confidential Attorney - Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000380	09/10/04	Email	Malcolm Davies	Bob Burns Dick Moran Joe Vadeboncoeur		Confidential Client - Attorney communication for the purpose of legal advice re response to LeMond re license agreement.	ACP, WP
TREK PRIV 000380	09/09/04	Email	Bob Burns	Dick Moran Joe Vadeboncoeur Malcolm Davies		Confidential Attorney - Client communication for the purpose of legal advice re response to LeMond re license agreement.	ACP, WP
TREK PRIV 000381	09/09/04	Email	Dick Moran	Bob Burns Joe Vadeboncoeur Malcolm Davies		Confidential Client - Attorney communication for the purpose of legal advice re response to LeMond re license agreement.	ACP, WP
TREK PRIV 000381	09/09/04	Email	Bob Burns	Dick Moran Joe Vadeboncoeur Malcolm Davies		Confidential Attorney - Client communication for the purpose of legal advice re response to LeMond re license agreement.	ACP, WP
TREK PRIV 000382	09/03/04	Email	Bob Burns	Dick Moran Joe Vadeboncoeur Malcolm Davies		Confidential Attorney - Client communication for the purpose of legal advice re response to LeMond re license agreement.	ACP, WP
TREK PRIV 000382	09/07/04	Email	Dick Moran	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re response to LeMond re license agreement.	ACP, WP
TREK PRIV 000383	09/06/04	Email	Malcolm Davies	Bob Burns Dick Moran	John Burke	Confidential Client - Attorney communication for the purpose of legal advice re response to LeMond	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
				Joe Vadeboncoeur Malcolm Davies		re license agreement.	
TREK PRIV 000384	09/04/04	Email	Joe Vadeboncoeur	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re response to LeMond.	ACP, WP
TREK PRIV 000385	08/27/04	Email	Bob Burns	Lisa Smith		Forwarding 8/26/04 confidential communication between outside counsel for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000385	08/26/04	Email	Ralph Weber	Bob Burns Loren Brown	Chris Dombrowicki	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000386- TREK PRIV 000387	08/13/04	Email	Bob Burns	John Burke Dick Burke Joe Siefkes	Loren Brown Ralph Weber	Confidential Attorney - Client communication for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000388	08/12/04	Email	Dick Burke	John Burke Joe Siefkes Joe Vadeboncoeur Bob Burns Dick Moran		Confidential Client - Attorney communication for the purpose of legal advice re discussion with S. Bluming re G. LeMond.	ACP, WP
TREK PRIV 000388	08/12/04	Email	Bob Burns	Dick Burke John Burke Joe Siefkes Joe Vadeboncoeur		Confidential Attorney - Client communication for the purpose of legal advice re discussion with S. Bluming re G. LeMond.	ACP, WP
TREK PRIV 000388	08/12/04	Email	Bob Burns	John Burke Joe Siefkes Joe Vadeboncoeur Dick Burke Dick Moran		Confidential Attorney - Client communication for the purpose of legal advice re discussion with S. Bluming re G. LeMond.	ACP, WP
TREK PRIV 000389	08/10/04	Notes	Bob Burns			Confidential Attorney handwritten notes re meeting with Sidney Bluming, reflecting Attorney work product and mental impressions and for the purpose of legal advice re Trek.	ACP, WP
TREK PRIV 000390	08/10/04	Email	Bob Burns	John Burke	Dick Moran Joe Vadeboncoeur Joe Siefkes Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice re meeting with S. Bluming.	ACP, WP
TREK PRIV 000391	08/04/04	Email	Dick Burke	Bob Burns Joe Siefkes		Confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
				John Burke		contractual relationship.	
TREK PRIV 000391- TREK PRIV 000392	08/04/04	Email	Bob Burns	Dick Burke Joe Siefkes John Burke		Confidential Attorney - Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000393	08/01/04	Email	Bob Burns	Lisa Smith		Forwarding 08/01/04 emails exchanges between B. Burns, J. Burke, J. Siefkes, D. Burke.	ACP, WP
TREK PRIV 000393- TREK PRIV 000395	08/01/04	Email	Bob Burns	John Burke Dick Burke Joe Siefkes		Confidential Attorney – Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000396	07/30/04	Email	Kay McCurdy	John Burke	Dick Burke Mary Burke	Confidential Attorney – Client communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000397	08/01/04	Email	Bob Burns	Lisa Smith		Forwarding 8/1/04 confidential Client – Attorney communication from D. Burke, for the purpose of legal advice re communications.	ACP, WP
TREK PRIV 000397	08/01/04	Email	Dick Burke	Bob Burns	John Burke	Confidential Client - Attorney communication for the purpose of legal advice re communications.	ACP, WP
TREK PRIV 000398	07/29/04	Email	John Burke	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re call with S. Bluming re Trek-LeMond.	ACP, WP
TREK PRIV 000398	07/30/04	Email	Bob Burns	Lisa Smith		Forwarding 7/28/04 and 7/29/04 confidential Client – Attorney communications for the purpose of legal advice re call with S. Bluming re Trek-LeMond.	ACP, WP
TREK PRIV 000398- TREK PRIV 000399	07/28/04	Email	Bob Burns	John Burke	Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice re call with S. Bluming re Trek-LeMond.	ACP, WP
TREK PRIV 000400- TREK PRIV 000402	07/22/04	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re call with S. Bluming re Trek-LeMond.	ACP, WP
TREK PRIV 000403	07/22/04	Notes	Bob Burns			Confidential Attorney handwritten notes re telephone call, reflecting Attorney work product and mental impressions and for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000404	07/29/04	Email	Anne Marie Peterson	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re royalty.	ACP, WP
TREK PRIV 000404	07/29/04	Email	Bob Burns	Anne Marie Peterson	Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice re royalty.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000405	07/28/04	Email	Bob Burns	John Burke	Lisa Smith	Confidential Attorney - Client communication for the purpose of legal advice call with S. Bluming re Trek-LeMond.	ACP, WP
TREK PRIV 000406	07/28/04	Notes	Bob Burns			Confidential Attorney notes re conversation with Sidney Bluming, for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000407	07/2004	Notes	Trek Employee Bob Burns	Bob Burns		Confidential Client work product data compilation with attorney handwritten notes for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000408						PRODUCED, TREK 000809.	
TREK PRIV 000409	06/2003	Draft; Notes	Bob Burns	John Burke		Confidential Attorney draft letter to G. LeMond and notes to J. Burke for the purpose of legal advice re Trek Travel.	ACP, WP
TREK PRIV 000410	06/09/03	Email	Krista Rettig	John Burke Bob Burns		Confidential Attorney - Client communication re internal meeting with J. Burke and B. Burns and for the purpose of legal advice re response to G. LeMond re Trek Travel.	ACP, WP
TREK PRIV 000411	05/30/03	Email	Bob Burns	Anne Docter Katie Ishmael Dean Gore		Confidential Attorney - Client communication for the purpose of legal advice re response to LeMond attorney.	ACP, WP
TREK PRIV 000412	05/2003	Notes	Bob Burns			Confidential Attorney handwritten notes for the purpose of legal advice re response to LeMond attorney.	ACP, WP
TREK PRIV 000413	12/21/01	Email	Bob Burns Robert Drobnak	Robert Drobnak Bob Burns	Kay McCurdy Peg Anderson	Confidential Attorney - Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000414	12/20/01	Email	John Burke	Bob Burns	Cindy Thompson	Confidential Client - Attorney communication for the purpose of legal advice re call from S. Bluming re Stairmaster.	ACP, WP
TREK PRIV 000414	12/20/01	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re call from S. Bluming re Stairmaster.	ACP, WP
TREK PRIV 000415 TREK PRIV 000417	12/20/01	Fax; Letter	Robert Drobnak	Bob Burns	Kay McCurdy Margaret Anderson	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000418	12/20/01	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re call from S. Bluming re Stairmaster.	ACP, WP
TREK PRIV 000419	12/20/01	Notes	Bob Burns			Confidential Attorney handwritten notes re call	WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						with Sidney Bluming re Stairmaster, for the purpose of legal advice re LeMond.	
TREK PRIV 000420	11/27/00	Email	John Burke	Dean Gore	Bob Burns Cindy Thompson Dick Moran	Confidential Client - Attorney communication for the purpose of legal advice re LeMond contract.	ACP, WP
TREK PRIV 000420	11/27/00	Email	Dean Gore	Dick Moran John Burke Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re LeMond contract.	ACP, WP
TREK PRIV 000420	11/28/00	Email	Bob Burns	John Burke Dean Gore	Cindy Thompson Dick Moran	Confidential Attorney - Client communication for the purpose of legal advice re LeMond contract.	ACP, WP
TREK PRIV 000421	10/06/00	Email	Nate Tobecksen	John Burke	Bob Burns Dick Moran	Confidential Client - Attorney communication for the purpose of legal advice re LeMond accessories.	ACP, WP
TREK PRIV 000422	12/14/99	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re communication with S. Bluming.	ACP, WP
TREK PRIV 000423	06/09/00	Memo	John Burke	Joyce Keehn Mary Burke Dick Moran Pat Sullivan Joe Siefkes Gary Ellerman Tim Callahan Joe Vadeboncoeur Brad Wagner	Bob Burns	Confidential Client – Client communication copied to Attorney re LeMond accessories and PTL.	ACP
TREK PRIV 000424- TREK PRIV 000429	05/26/00	Drafts	Bob Burns			Confidential draft letters to Sidney Bluming, for the purpose of legal advice re LeMond accessories and PTL.	ACP, WP
TREK PRIV 000430	05/25/00	Email	Ira Langer	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re LeMond accessories and PTL.	ACP, WP
TREK PRIV 000431	05/27/00	Notes	Bob Burns			Confidential Attorney handwritten notes re call with Sidney Bluming, for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000432	06/06/99 06/04/99 06/03/99	Email	John Burke Bob Burns	Bob Burns John Burke		Confidential Client – Attorney and Attorney - Client communications for the purpose of legal advice re communication with S. Bluming.	ACP, WP
TREK PRIV 000433	05/17/99	Email	Bob Burns Ira Langer	Ira Langer Bob Burns		Confidential Attorney – Client and Client - Attorney communications for the purpose of legal	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						advice re LeMond.	
TREK PRIV 000434	05/14/99	Notes	Bob Burns			Confidential Attorney handwritten notes re call with S. Bluming, for the purpose of legal advice re LeMond.	WP
TREK PRIV 000435- TREK PRIV 000442	09/01/95	Memo	Joe Siefkes	John Burke Tom Albers	Bob Burns Jeff Stang	Confidential Client – Attorney communication with Attorney handwritten notes for the purpose of legal advice re Trek-LeMond license agreement.	ACP, WP
TREK PRIV 000443	02/07/05	Email	Mark Marusarz	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re PTI.	ACP, WP
TREK PRIV 000444	01/06/05	Email	Jill Marinoff	Bob Burns	Loren Brown	Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000444	01/06/05	Email	Bob Burns	Lisa Smith		Forwarding 1/6/05 confidential Attorney – Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000445	12/22/04	Letter	Jill Marinoff	Bob Burns	Loren Brown	Confidential Attorney – Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000446	07/14/06	Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re draft letter to LeMond.	ACP, WP
TREK PRIV 000446	07/16/06	Email	John Burke	Bob Burns	Cindy Wagner	Confidential Client – Attorney communication for the purpose of legal advice re draft letter to LeMond.	ACP, WP
TREK PRIV 000447- TREK PRIV 000449	07/18/06	Draft	Bob Burns	John Burke		Confidential draft letters for the purpose of legal advice re responses to LeMond re public feedback from LeMond comments.	ACP, WP
TREK PRIV 000450- TREK PRIV 000453	04/04/05	Draft Memo	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000454	04/04/05	Draft Memo	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000455	04/04/05	Draft	John Burke	Bob Burns		Confidential draft letter for the purpose of legal advice re meeting with LeMond.	ACP, WP
TREK PRIV 000456	08/11/99	Email	Bob Burns	Brad Wagner Gary McCarthy Curtis Dresen Anne Docter	Joe Siefkes Joyce Keehn	Confidential Attorney – Client communication for the purpose of legal advice LeMond TCG agreement and bicycle agreement.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
				Ira Langer Dean Gore Pat Sullivan Dick Moran			
TREK PRIV 000457	04/17/97	Notes	Bob Burns			Confidential Attorney designation of recipient of 04/17/97 letter to Sydney Bluming re TCG Agreement.	ACP, WP
TREK PRIV 000458- TREK PRIV 000459	07/19/96	Notes	Bob Burns			Confidential Attorney handwritten notes re call with Sidney Bluming and communication with J. Burke, for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000460- TREK PRIV 000461	07/05/96 07/08/96	Email	Bob Burns John Burke	John Burke Bob Burns	Jerry Norquist	Confidential Attorney – Client and Client – Attorney communications for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000462- TREK PRIV 000464	07/01/96 07/02/96	Email; Notes	Bob Burns John Burke	John Burke Bob Burns		Confidential Attorney – Client and Client – Attorney communications for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000465	06/03/96 06/04/96	Email	Bob Burns John Burke	John Burke Bob Burns		Confidential Attorney - Client and Client – Attorney communications for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000466	05/23/96	Notes	Bob Burns			Confidential Attorney handwritten notes re telephone call from Sidney Bluming, for the purpose of legal advice re negotiations with LeMond.	WP
TREK PRIV 000467- TREK PRIV 000469	05/16/96 05/17/96 Undated	Email	Bob Burns John Burke	John Burke Bob Burns		Confidential Attorney - Client and Client – Attorney communications for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000470	05/1996	Draft Email	Bob Burns	John Burke		Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000471	12/18/95	Draft; Notes	Jerry Norquist	Bob Burns		Confidential Attorney - Client draft letter to LeMond with Attorney – Client handwritten notations, for the purpose of legal advice re Trek-LeMond agreement.	ACP, WP
TREK PRIV 000472- TREK PRIV 000473	11/09/04	Email	Bob Burns	John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re Trek-LeMond.	ACP, WP
TREK PRIV 000474- TREK PRIV 000479	11/08/04	Memo	Ralph Weber	Bob Burns		Confidential Attorney memo for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000480-	11/09/04	Memo	Loren Brown	Bob Burns		Confidential Attorney memo for the purpose of	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000496						legal advice re LeMond.	
TREK PRIV 000497	06/30/06	Memo	Bob Burns	Dick Burke	John Burke	Confidential Attorney – Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000498- TREK PRIV 000499	06/26/06	Notes	Bob Burns			Confidential Attorney handwritten notes re call with S. Bluming re LeMond comments for the purpose of legal advice re LeMond.	WP
TREK PRIV 000500	06/29/06	Email	Bob Burns	Dick Burke	John Burke	Confidential Attorney - Client communication re for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000501- TREK PRIV 000503	06/27/06	Email	Bob Burns	John Burke	Dick Burke	Confidential Attorney - Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000504	06/28/06	Notes	Bob Burns			Confidential Attorney handwritten notes re call with L. Temple for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000505- TREK PRIV 000506	06/27/06 06/28/06	Email	Dick Burke Bob Burns	Bob Burns Dick Burke	John Burke	Confidential Attorney - Client and Client – Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000507- TREK PRIV 000511	07/28/06	Notes	Bob Burns			Confidential Attorney handwritten notes for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000512- TREK PRIV 000514	2006	Draft	Bob Burns	John Burke		Confidential Attorney - Client draft letter re public feedback to LeMond comments for purpose of legal advice re response to LeMond.	ACP, WP
TREK PRIV 000515- TREK PRIV 000516	07/16/04	Notes	John Burke Bob Burns	Bob Burns John Burke		Confidential Client handwritten notes re communication between J. Burke and B. Burns for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000517	08/05/99	Fax	Bob Burns	Joe Siefkes		Confidential Attorney - Client fax cover sheet communication for the purpose of legal advice re LeMond amendment.	ACP, WP
TREK PRIV 000518	08/06/99	Notes	Bob Burns	Joe Siefkes		Confidential Attorney handwritten notes re communication with J. Siefkes for the purpose of legal advice re LeMond agreement.	ACP, WP
TREK PRIV 000519	08/02/99	Letter	Bob Burns	Neal White		Confidential Attorney - Attorney communication for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000520	07/23/99	Notes	Bob Burns			Confidential Attorney handwritten notes for the purpose of legal advice re communication with S. Bluming.	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000521	07/15/99 07/16/99 07/17/99	Email	Bob Burns Ira Langer	Ira Langer Bob Burns		Confidential Attorney – Client and Client – Attorney communications for the purpose of legal advice re communication with LeMond.	ACP, WP
TREK PRIV 000522	07/1999	Voice-mail	Ann Doctor	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000522	07/1999	Voice-mail	Janet Nelson	Bob Burns		Confidential Client - Attorney communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000523- TREK PRIV 000525						PRODUCED, TREK 11379-11381.	
TREK PRIV 000526- TREK PRIV 000527	07/07/99	Email	Bob Burns	John Burke	Joe Siefkes	Confidential Attorney - Client communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000528- TREK PRIV 000529	07/07/99	Draft	Bob Burns	Joe Siefkes		Confidential Attorney draft of letter to Sidney Bluming with handwritten notations for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000530- TREK PRIV 000533	06/24/99 06/27/99 06/28/99	Email; Notes	Bob Burns John Burke	John Burke Bob Burns	Joe Siefkes Cindy Smith	Confidential Attorney – Client and Client – Attorney communications with Attorney notations for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000534	06/28/99	Email	Joe Siefkes	Bob Burns John Burke	Cindy Smith	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000535	06/24/99	Notes	Bob Burns			Confidential Attorney handwritten notes re call with Sidney Bluming, for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000536- TREK PRIV 000537	06/15/99	Draft	John Burke	Bob Burns		Confidential draft memo with handwritten notes for the purpose of legal advice re communication with LeMond re accessories.	ACP, WP
TREK PRIV 000538	06/07/99	Email	Bob Burns	John Burke	Joe Siefkes	Confidential Client - Attorney communication for the purpose of legal advice re negotiations with LeMond.	ACP, WP
TREK PRIV 000539	06/07/99	Email	Bob Burns	John Burke	Ira Langer	Confidential Attorney - Client communication for the purpose of legal advice re meeting with LeMond.	ACP, WP
TREK PRIV 000539	06/07/99	Email	Ira Langer	Bob Burns		Confidential Client - Attorney communication for	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						the purpose of legal advice re meeting with LeMond.	
TREK PRIV 000540	10/23/97	Email	Bob Burns	John Burke Joe Siefkes		Confidential Attorney - Client communication for the purpose of legal advice re communication with S. Bluming re TCG agreement.	ACP, WP
TREK PRIV 000541	09/23/97	Draft; Notes	Bob Burns	John Burke		Confidential draft memo to LeMond with Attorney handwritten notes and confidential designation of Client recipients of same.	ACP, WP
TREK PRIV 000542	09/22/97	Email	John Burke Bob Burns	John Burke	Joe Siefkes	Confidential Attorney - Client and Client Attorney communications for the purpose of legal advice re communication with LeMond re accessories.	ACP, WP
TREK PRIV 000543						PRODUCED, TREK 011394	
TREK PRIV 000544						PRODUCED, TREK 013359	
TREK PRIV 000545- TREK PRIV 000548	2008	Notes	Elisabeth Huber	Bob Burns		Confidential Client compilation of data at the behest of Attorney in anticipation of litigation and re legal advice re Trek-LeMond.	ACP, WP
TREK PRIV 000549	10/20/08	Email	Mark Joslyn	Jeff Stang	Bob Burns Jeff McFarlane	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP
TREK PRIV 000550	10/20/08	Email	Mark Joslyn	Jeff Stang Jeff McFarlane	Bob Burns	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP
TREK PRIV 000551	10/21/08	Email	Jeff McFarlane	Mark Joslyn Jeff Stang	Bob Burns	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP
TREK PRIV 000552	10/21/08	Email	Jeff Stang	Jeff McFarlane	Bob Burns Mark Joslyn Joe Siefkes	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP
TREK PRIV 000553	10/21/08	Email	Mark Joslyn	Jeff Stang Jeff McFarlane	Bob Burns Joe Siefkes	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP
TREK PRIV 000554	10/21/08	Email	Bob Burns	Mark Joslyn Jeff Stang Jeff McFarlane	Joe Siefkes Tim Callahan	Confidential Attorney – Client communication re legal advice re personnel matters.	ACP
TREK PRIV 000555	10/21/08	Email	Tim Callahan	Bob Burns Mark Joslyn Jeff Stang Jeff McFarlane	Joe Siefkes	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP
TREK PRIV 000556	10/21/08	Email	Bob Burns	Tim Callahan Mark Joslyn Jeff Stang	Joe Siefkes Lisa Smith	Confidential Client – Attorney communication re legal advice re personnel matters.	ACP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
				Jeff McFarlane			
TREK PRIV 000557	10/22/08	Email	Jeff Stang	Sharee Schwartz		Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000557	10/27/08	Email	Sharee Schwartz	Jeff Stang		Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000558	10/27/08	Email	Jeff Stang	Sharee Schwartz		Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000559	10/27/08	Email	Sharee Schwartz	Jeff Stang		Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000560	10/27/08	Email	Jeff Stang	Bob Burns Jeff McFarlane Tim Callahan	Mark Joslyn Joe Siefkes	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000561	10/27/08	Email	Mark Joslyn	Jeff Stang Bob Burns Jeff McFarlane Tim Callahan	Joe Siefkes	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000562	10/27/08	Email	Bob Burns	Jeff Stang Jeff McFarlane Tim Callahan	Mark Joslyn Joe Siefkes	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000563	10/28/08	Email	Tim Callahan	Jeff Stang Bob Burns Jeff McFarlane	Mark Joslyn Joe Siefkes	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000564	10/28/08	Email	Jeff McFarlane	Jeff Stang Bob Burns Tim Callahan	Mark Joslyn	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000565	10/29/08	Email	Tim Callahan	Jeff Stang	Steve Malchow	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000565	10/29/08	Email	Jeff Stang	Tim Callahan	Steven Malchow	Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000566	10/29/08	Email	Jeff Stang	Mark Joslyn Bob Burns Joe Siefkes		Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000566	10/29/08	Email	Mark Joslyn	Jeff Stang Bob Burns Joe Siefkes Tim Callahan		Confidential Client communication at the behest of Attorney re legal advice re personnel matters.	ACP
TREK PRIV 000567	11/05/08	Email	Mark Joslyn	Jeff Stang	Jennifer Pagels	Confidential Client communication at the behest of	ACP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
				Joe Siefkes Bob Burns		Attorney re legal advice re personnel matters.	
TREK PRIV 000568	06/22/05	Email	Bob Burns	John Burke	Dick Moran	Confidential Attorney – Client communication for the purpose of legal advice re communication with CSE attorney and G. LeMond.	ACP, WP
TREK PRIV 000569	09/15/04	Email	Bob Burns	Ralph Weber	Lisa Smith Loren Brown	Attorney – Attorney communication for the purpose of legal advice re LeMond	ACP, WP
TREK PRIV 000569- TREK PRIV 000570	09/15/04	Email	Ralph Weber	Loren Brown	Bob Burns	Attorney – Attorney communication for the purpose of legal advice re LeMond	ACP, WP
TREK PRIV 000570	09/10/04	Email	Loren Brown	Bob Burns Ralph Weber		Attorney – Attorney communication and forwarding information from J. Basoa for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000570- TREK PRIV 000571	09/10/04	Email	Jennifer Basoa	Loren Brown		Attorney – Attorney communication forwarding information for B. Burns for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000572- TREK PRIV 000581	Undated		Bob Burns			Confidential Attorney research results reflecting Attorney’s thought processes for the purpose of legal advice.	ACP, WP
TREK PRIV 000582	06/09/00	Draft Memo	John Burke	Joyce Keehn Mary Burke Dick Moran Pat Sullivan Joe Siefkes Gary Ellerman Tim Callahan Joe Vadeboncoeur Brad Wagner	Bob Burns	Confidential Client - Attorney draft memo re LeMond accessories and PTI.	ACP
TREK PRIV 000583	07/21/04	Email	Joe Vadeboncoeur	Bob Burns	John Burke	Confidential Client – Attorney communication for the purpose of legal advice re LeMond-Trek contractual relationship.	ACP, WP
TREK PRIV 000583	07/21/04	Email	Bob Burns	Joe Vadeboncoeur Bob Burns		Confidential Attorney – Client communication for the purpose of legal advice re LeMond-Trek contractual relationship.	ACP, WP
TREK PRIV 000584	04/15/04	Email	Anne Marie Peterson	Bob Burns	Denise DeMarb	Confidential Client – Attorney communication for the purpose of legal advice re LeMond-Trek contractual relationship.	ACP, WP
TREK PRIV 000584	04/15/04	Email	Bob Burns	Lisa Smith		Forwarding A. Peterson’s 4/15/04 email for the purpose of legal advice re LeMond-Trek	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						contractual relationship.	
TREK PRIV 000585	08/19/99	Email	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re S. Bluming communication re PTI.	ACP, WP
TREK PRIV 000585	08/23/99	Email	John Burke	Bob Burns	Cindy Smith	Confidential Client – Attorney communication for the purpose of legal advice re S. Bluming communication re PTI.	ACP, WP
TREK PRIV 000586	01/04/00	Email	Joe Siefkes	John Burke	Bob Burns	Confidential Client – Client communication with copies to Attorney for the purpose of legal advice re LeMond-Trek contract.	ACP, WP
TREK PRIV 000587	11/09/96	Fax; Notes	Joe Siefkes	Bob Burns		Confidential Client – Attorney fax cover letter to 11/9/96 letter to LeMond Cycling, Inc. from J. Siefkes and handwritten communication to B. Burns re S. Bluming.	ACP
TREK PRIV 000588	08/07/01	Notes	Bob Burns			Confidential Attorney notes on copy of document produced at TREK 790 for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000589	07/11/06	Email	Bob Burns Frederic Benech	Frederic Benech ² Bob Burns		Confidential Attorney – Attorney communications for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000589	07/11/06	Email	Bob Burns	Lisa Smith		Forwarding 7/11/06 email B. Burns - F. Benech emails for the purpose of legal advice re LeMond.	ACP, WP
TREK PRIV 000590	07/15/99	Letter	Sherwin Peltin ³	Bob Burns		Confidential Attorney – Attorney communication re legal advice re LeMond.	ACP, WP
TREK PRIV 000591- TREK PRIV 000594	11/27/07	Email; Draft	Dean Gore	Amy Davison Lisa Smith		Confidential Client – Attorney communication and attached draft agreement for the purpose of legal advice re LeMond sponsorship.	ACP, WP
TREK PRIV 000595	10/29/07	Email	Dean Gore	Lisa Smith Amy Davison		Confidential Client – Attorney communication for the purpose of legal advice re drafting LeMond sponsorship agreement.	ACP, WP
TREK PRIV 000595- TREK PRIV 000599	10/30/07	Email; Draft	Amy Davison	Dean Gore	Lisa Smith	Confidential Attorney – Client communication and attached draft agreement for the purpose of legal advice re LeMond sponsorship agreement.	ACP, WP
TREK PRIV 000600	03/07/07	Email	Dean Gore	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re LeMond	ACP, WP

² Outside Counsel to Trek.

³ Weiss Berzowski Brady & Donahue LLP – Outside Counsel to Trek.

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						sponsorship agreement.	
TREK PRIV 000600	03/07/07	Email	Dean Gore	Amy Davison		Forwarding his 3/7/07 email to B. Burns for the purpose of legal advice re LeMond sponsorship agreement.	ACP, WP
TREK PRIV 000600	03/08/07	Email	Amy Davison	Dean Gore	Bob Burns	Confidential Attorney – Client communication for the purpose of legal advice re LeMond sponsorship agreement.	ACP, WP
TREK PRIV 000601	11/03/06	Email	Dean Gore	Lisa Smith Amy Davison		Confidential Client – Attorney communication for the purpose of legal advice re LeMond sponsorship agreement.	ACP, WP
TREK PRIV 000602	10/26/04	Email	Bob Burns	John Burke	Cindy Wagner	Confidential Attorney – Client communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000603	06/11/05	Email	Bob Burns	John Burke Dick Moran		Confidential Attorney – Client communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000603	06/12/05	Email	John Burke	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000603	06/12/05	Email	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000603	06/12/05	Email	John Burke	Bob Burns	Cindy Wagner	Confidential Client – Attorney communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000604	07/07/06	Email	Dick Burke	Bob Burns John Burke		Confidential Client – Attorney communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000604	07/08/06	Email	Bob Burns	Dick Burke John Burke		Confidential Attorney – Client communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000604	07/08/06	Email	Dick Burke	Bob Burns John Burke		Confidential Client – Attorney communication for the purpose of legal advice re Trek’s contractual arrangements.	ACP, WP
TREK PRIV 000604	07/08/06	Email	John Burke	Dick Burke	Bob Burns	Confidential Client – Client and Client – Attorney communication for the purpose of legal advice re Trek’s contractual relationships.	ACP, WP
TREK PRIV 000604-	07/07/06	Email	Bob Burns	Dick Burke		Confidential Attorney – Client communication for	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
TREK PRIV 000605				John Burke		the purpose of legal advice re Trek's contractual relationships.	
TREK PRIV 000606	08/02/06	Email	Lisa Smith	Bob Burns		Confidential communication for the purpose of draft response to S. Bluming.	ACP, WP
TREK PRIV 000606	08/02/06	Email	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of draft response to S. Bluming.	ACP, WP
TREK PRIV 000607	03/06/07	Email	Dean Gore	Bob Burns Dick Moran John Burke		Confidential Client – Attorney communication for the purpose of draft response to LeMond.	ACP, WP
TREK PRIV 000607	03/06/07	Email	Bob Burns	Dean Gore Dick Moran John Burke		Confidential Attorney – Client communication for the purpose of draft response to LeMond.	ACP, WP
TREK PRIV 000607- TREK PRIV 000608	03/06/07	Email	Bob Burns	John Burke Dean Gore Dick Moran		Confidential Attorney – Client communication for the purpose of draft response to LeMond.	ACP, WP
TREK PRIV 000609	11/28/07	Email	Bob Burns	John Burke		Confidential Attorney – Client communication re G. LeMond interview for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000609- TREK PRIV 000610	11/28/07	Email	Bob de Wit	David van Dyck Malcolm Davies Bob Burns		Confidential Client - Attorney communication re G. LeMond interview and translation for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP-WP
TREK PRIV 000611	01/16/08	Email	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re S. Bluming communication re LeMond with Trek.	ACP, WP
TREK PRIV 000611	01/17/08	Email	John Burke	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re S. Bluming communication re LeMond with Trek.	ACP, WP
TREK PRIV 000612	03/19/08	Email	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re Trek-LeMond contractual relationship.	ACP, WP
TREK PRIV 000612	03/19/08	Email	John Burke	Bob Burns		Confidential Client – Attorney communication for the purpose of legal advice re communication with S. Bluming.	ACP, WP
TREK PRIV 000612	03/19/08	Email	Bob Burns	John Burke		Confidential Attorney – Client communication for the purpose of legal advice re communication with S. Bluming.	ACP, WP
TREK PRIV 000613	Undated	Notes	Elisabeth	Bob Burns		Confidential Client – Attorney handwritten notes	ACP, WP

Bates No.	Date	Type	Author	Recipient(s)	CC(s)	Description	Privilege
						and work product at the request of Attorney for the purpose of legal advice re LeMond.	
TREK PRIV 000614- TREK PRIV 000615	Undated	Notes	Trek Employee	Bob Burns		Confidential work product at request of Attorney for purpose of legal advice re LeMond.	WP