

# **Exhibit 41**

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LeMond Cycling, Inc. vs. Trek Bicycle Corporation

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT  
CIVIL ACTION NO. MINN. 08-CV-01010

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LeMOND CYCLING, INC., :

Plaintiff, :

-versus- :

TREK BICYCLE CORPORATION, :

Defendant. :

-----x

Deposition of ANDREW MORRIS,  
taken pursuant to the Federal Rules of Civil  
Procedure, at the offices of Sanders, Gale &  
Russell, 438 Orange Street, New Haven,  
Connecticut, before James A. Martone, L.S.R.  
#00248, and a Notary Public in and for the  
State of Connecticut, on May 6, 2009, at  
9:32 a.m.

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1 recall whether Greg was part of the presentation or  
2 whether he was there, and I don't remember what year  
3 it was.

4 Q. Okay. Now we were talking about items  
5 that were raised with the board that were out of the  
6 ordinary that stood out to you a few minutes ago.

7 A. Uh-huh.

8 Q. Now I want to talk a little bit about  
9 times during your tenure on the board of directors,  
10 where Mr. LeMond was the subject of any discussions  
11 at board meetings. Do you recall incidents where  
12 Mr. LeMond was a topic of discussion at board  
13 meetings?

14 A. Yes.

15 Q. How many such incidents do you recall?

16 A. Maybe two.

17 Q. Two. If you can, starting with the  
18 earliest one, if they're far enough part in time  
19 that you can distinguish, starting -- or in any  
20 order, can you start with one and describe what you  
21 recall about that, the discussion and the issue.

22 A. I don't recall. I think I asked the  
23 question because I think I had seen something in the  
24 paper, and I suspect that might be around the turn  
25 of the century, 2000, 2001.

1 Q. Okay.

2 A. But it was something I had seen in the  
3 paper prior to coming to a meeting.

4 Q. Do you recall what you had seen?

5 A. No, I don't. I don't remember the  
6 details. It had to do with Greg and being  
7 questioned, and I don't remember the context of it.

8 Q. Was it -- Do you recall if it was related  
9 to Lance Armstrong or something else?

10 A. I think the only reason I would have asked  
11 the question, it probably did, but I don't remember.

12 Q. Okay. What about the second incident that  
13 you recall, where Greg was a topic of discussion at  
14 the board?

15 A. It was that board meeting which was  
16 requested, all the board members were requested  
17 to --

18 Q. Okay.

19 A. -- send their point of view.

20 Q. Starting with the 2001, and what you  
21 recall is that you asked a question based on  
22 something you had seen in the paper, do you recall  
23 how much discussion there was at the board level  
24 about your question or anything related to that?

25 MR. WEBER: Let me just --

1           **A. No.**

2                           MR. WEBER: Just a second. Let me  
3 just object to the form of the question. You put in  
4 the year 2001, and the witness said sometime around  
5 the turn of the century.

6           **A. I don't remember. I haven't the foggiest**  
7 **idea.**

8           Q. That's fine. Okay.

9           **A. What was your question again, please?**

10          Q. I'm just curious if you remember anything  
11 in terms of how much discussion there was around  
12 2001, the way you phrased it, around the turn of the  
13 century.

14          **A. It was just five minutes; very short.**

15          Q. Do you remember who participated in those  
16 discussions?

17          **A. The board members.**

18          Q. Do you remember which specific ones?

19          **A. Yes. The question was asked of John and**  
20 **John answered it.**

21          Q. Do you remember what John's answer was?

22          **A. No. Other than he was aware of the**  
23 **situations, I don't recall.**

24          Q. Okay. Do you ever recall any discussions  
25 at the board about Mr. LeMond and a contract that he