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2	UNITED STATES DISTRICT COURT		
3	DISTRICT OF MINNESOTA		
4	x		
5	LEMOND CYCLING, INC.,		
6	Plaintiff, Case No	•	
7	-against- 08-CV-01	010	
В	TREK BICYCLE CORPORATION, (RHK/JS	M)	
9	Defendant/Third-Party Plaintiff,		
10	-against-		
11	GREG LEMOND,		
12	Third-Party Defendant.		
13	x		
14			
15	May 7, 2009		
16	9:33 a.m.		
L7			
L8	Deposition of IRA LANGER, held at		
L9	the offices of Foley & Lardner LLP, 90 Park		
20	Avenue, New York, New York, pursuant to		
21	Subpoena, before Mildred Cassese, a		
22	Registered Professional Reporter and Notary		
23	Public of the State of New York.		
24			
25		ЕХНІВІТ	
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2	APPEARANCES:	
<b>3</b> , .		
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8	Minneapolis, MN 55402-2015	
9	BY: DENISE S. RAHNE, ESQ.	
10	JENNIFER M. ROBBINS, ESQ.,	
11	of Counsel	
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13	GASS WEBER MULLINS LLC	
14	Attorneys for Defendant/Third-Party	
15	Plaintiff Trek Bicycle Corporation	
16	and Witness	
17	309 North Water Street	
18	Milwaukee, WI 53202	
19	BY: RALPH WEBER, ESQ.	
20		
21	ALSO PRESENT:	
22	Bob Burns	
23	Trek Vice President & General Counsel	
24		
25		

- 1 I. Langer
- 2 about how Greg would do these autographs and talk
- 3 to people, that Greg was just Greg.
- 4 Can you sort of elaborate on that a
- 5 little bit?
- 6 A. Sure. Greg would make everyone -- if
- 7 someone came over to him and said that they met
- 8 him five years ago he would make -- whether he had
- 9 actually remembered meeting them five years ago, I
- 10 don't know, but they were sure convinced that he
- 11 remembered that.
- 12 Every person who was sitting across
- from him was the most important person in the room
- 14 at that moment.
- And there would be 300 people lined up
- 16 behind to get his autograph and talk with him, and
- 17 he would be spending an inordinate amount of time
- 18 with one person because they had some magazine
- 19 that he hadn't seen in a long time, or a picture
- of a bicycle he hadn't seen in a long time and,
- 21 you know, just a nice guy, you know.
- 22 People liked talking to him and he
- 23 like talking to people.
- Q. Did you ever get any feedback from the
- 25 dealers that held these grand openings and events

- 1 I. Langer
- 2 as to what they thought, how well they thought the
- 3 event went?
- 4 A. Yeah. It was always unanimous.
- People were always, like, oh, when can he come
- 6 back again, you know, that kind of thing
- 7 because -- and it was two different things: One,
- 8 he drew a lot of people; two, he put a great big
- 9 smile on everybody's face.
- 10 Q. So you mentioned that you did some
- 11 dealer appearances and you listed several cities
- 12 or places, Boston, Colorado.
- 13 Which ones specifically, which
- 14 dealerships do you remember going to with Greg?
- 15 A. Metro Bicycles in New York.
- 16 International Bicycles in Boston.
- 17 Belmont Wheelworks in Boston.
- 18 Wheat Ridge Cyclery in Colorado.
- 19 Redlands Cycles in Redlands,
- 20 California.
- 21 Chain Reaction in the San Francisco
- 22 area.
- 23 Helen's in Santa Monica, California.
- 24 It's been a while.
- 25 Q. The time that you went to Metro, is

- 1 I. Langer
- 2 brand?
- 3 A. Design, test and promote are three
- 4 very different things.
- 5 Did Greg work closely with Trek to
- 6 promote his brand? Absolutely.
- 7 Did Greg work closely with Trek to
- 8 design the brand? To some degree.
- 9 There wasn't any testing involved that
- 10 I would be aware of.
- 11 Q. How did Greg work with Trek to design
- 12 the brand?
- 13 A. Greg had a philosophy of how a bicycle
- 14 should fit, how a bicycle should ride, and it was
- 15 a philosophy that made the bicycle a little more
- 16 comfortable than some of the other racing bikes
- out there, a little more suitable for longer
- 18 rides, and most of that had to do with the fact
- 19 that in Europe the roads weren't as good as they
- 20 are here and the races were longer.
- 21 Q. So did he just provide suggestions to
- 22 people within Trek, or --
- 23 A. He would provide suggestions. He
- 24 would bring his old bicycles and we would, you
- 25 know, they would base line them, measure them and