

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LeMond Cycling Inc.,

Plaintiff,

v.

Case No. 08-CV-1010 (RHK/JSM)

Trek Bicycle Corporation,

Defendant.

Trek Bicycle Corporation,

Plaintiff,

v.

Case No. 08-CV-2440 (RHK/JSM)

LeMond Cycling Inc.,

Defendant.

**LEMOND CYCLING INC.'S RESPONSE TO
TREK BICYCLE CORPORATION'S MOTION TO CONSOLIDATE**

LeMond Cycling Inc. (“LeMond Cycling”) submits this response to Trek Bicycle Corporation’s (“Trek”) Motion to Consolidate. LeMond Cycling does not oppose Trek’s Motion to Consolidate, and agrees that consolidation of the above actions (case numbers 08-CV-1010 and 08-CV-2440) will further judicial efficiency because they involve common questions of law and fact. LeMond Cycling agrees that no party will be prejudiced by consolidation, and that consolidation will avoid unnecessary costs to all

parties. LeMond Cycling, therefore, respectfully requests that the Court consolidate the above actions before the Honorable Richard H. Kyle.

Dated: June 24, 2008

ROBINS, KAPLAN, MILLER & CIRESI L.L.P

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