

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

LeMond Cycling, Inc.,

Plaintiff,

v.

Trek Bicycle Corporation,

Defendant/Third-Party Plaintiff,

v.

Greg LeMond,

Third-Party Defendant.

Case No. 08-CV-01010 (RHK/JSM)

**DECLARATION OF
DENISE S. RAHNE IN SUPPORT OF
PLAINTIFF'S MOTION FOR
ENTRY OF A PROTECTIVE
ORDER REGARDING
DEFENDANT'S THIRD-PARTY
SUBPOENAS**

Date: February 17, 2009

Time: 11:00 a.m.

Judge: Janie S. Mayeron

I, DENISE S. RAHNE, declare and state as follows:

1. I am an attorney representing Plaintiff LeMond Cycling, Inc. and Third-Party Defendant Greg LeMond (collectively "Plaintiff"). I make this Declaration on personal knowledge and in support of Plaintiff's Motion for Entry of a Protective Order Regarding Defendant's Third-Party Subpoenas.

2. Attached to this Declaration as Exhibit 1 is a true and correct copy of the Sublicense Agreement between LeMond Cycling, Inc. and Trek Bicycle, Corp., dated June 29, 1995.

3. Attached to this Declaration as Exhibit 2 is a true and correct copy of Trek's Subpoena and cover letter to Maslon, Edelman, Borman & Brand LLP, dated December 22, 2008.

4. Attached to this Declaration as Exhibit 3 is a true and correct copy of an email from Margo Brownell of Maslon, Edelman, Borman & Brand LLP to Denise S. Rahne of Robins, Kaplan, Miller & Ciresi L.L.P., dated January 7, 2009.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of February 2009.

/s/ Denise S. Rahne
Denise S. Rahne