

GASS WEBER MULLINS LLC
309 N WATER ST MILWAUKEE WI 53202
TEL 414 223 3300 FAX 414 224 6116
www.gasswebermullins.com



RALPH A. WEBER
DIRECT DIAL: 414 224-7698
weber@gasswebermullins.com

February 11, 2009

Hon. Janie S. Mayeron
United States Magistrate Judge
United States District Court
District of Minnesota
300 South Fourth Street
Minneapolis, MN 55415

RE: *LeMond Cycling, Inc. v. Trek Bicycle Corporation*
Case No. 08-cv-1010
Proposed Resolution of Protective Order Motion Re: Maslon Firm Documents

Dear Judge Mayeron:

Counsel for LeMond and Trek have worked together to resolve issues concerning a third-party subpoena to the Maslon Edelman firm. That subpoena sought documents relating to a case tried in the United States District Court for Minnesota, *LeMond Cycling, Inc. v. PTI Holdings, Inc.*, Case. No. 03-5441 (the "PTI" litigation). The Maslon firm represented LeMond Cycling, Inc. in that matter, and has 9 boxes of documents from that litigation.

Trek is interested in these materials as they may be relevant to issues (1) involving the sale of LeMond-branded bicycle related products, and (2) Mr. LeMond's performance of his duties to Trek.

The only issue remaining involves access to documents that are subject to a protective order in the PTI case, a copy of which is attached as Exhibit A. Paragraph 6e of that Order permits disclosure of protected documents to "persons designated by the Court in the interest of justice, upon such terms as the Court deems proper."

Hon. Janie S. Mayeron
February 11, 2009
Page 2

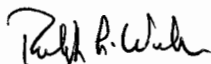
Counsel for Trek and LeMond jointly request that attorneys in the instant case for LeMond and Trek be given access to the PTI documents. Granting this access will allow the Maslon firm to avoid the effort and expense of going through all the documents to remove or redact information subject to the Protective Order. The PTI Protective Order follows the same approach as in the instant case, with information being designated as "Confidential" or "Attorney's Eyes Only," depending upon the nature of the information. Counsel for Trek and LeMond agree to comply with those same designations and protections, in accord with the PTI Order.

I have spoken with PTI's counsel, Martin Burkett of Miami, Florida, and learned that PTI's assets were sold. Mr. Burkett will contact his clients to determine whether they have any concerns with the proposed access. I have also spoken with Margo Brownell, a Maslon lawyer and former counsel for LeMond, and am providing her with a copy of this letter.

Assuming there is no objection, I would appreciate the Court entering a Minute Order allowing counsel for Trek and LeMond to have access to the documents in accord with the PTI Order, Exhibit A.

Thank You.

Sincerely,



Ralph A. Weber

RAW:jml

Enclosure

cc: Denise Rahne (w/enc.) (via email)
Martin Burkett (w/enc.) (via email)
Margo Brownell (w/enc.) (via email)