



Timothy J. Herman

Email: [REDACTED]

Direct dial: [REDACTED]

July 24, 2012

Mr. William Bock, III  
General Counsel  
United States Anti-Doping Agency  
5555 Tech Center Drive, Suite 200  
Colorado Springs, C) 80919

Re: Lance Armstrong v. United States Anti-Doping Agency, et al

Dear Bill:

This will confirm our conversation today wherein we discussed Armstrong's limited discovery requests of USADA and Armstrong's proposal that USADA re-consider its previous rejection of the request for an extension of the August 13, 2012 deadline as set out in my letter of yesterday. As to the latter, you indicated USADA declined the request in my letter and reiterated that USADA would only agree to extend the deadline by 10 days to August 23, 2012, but no longer.

This letter will confirm USADA's agreement to extend the current August 13, 2012 deadline by ten (10) days or to a date five (5) days after the Court rules on Mr. Armstrong's motion for preliminary injunction (and/or USADA's responses thereto, including any motion to dismiss USADA may file), whichever comes first.

This will further confirm that no party is waiving any rights, remedies, defenses or other actions which that party may elect to exercise or assert within or without the ten-day extension period. It is understood that USADA is not agreeing that Mr. Armstrong's claims have merit that the Court has jurisdiction over this matter or that venue is appropriate in the Western District of Texas.

You indicated you have not decided whether USADA would produce the material we requested but that you will respond by July 27, 2012 to the limited discovery requests contained in our July 23, 2012 correspondence and that the response may be that you will not produce anything at all because you do not feel the material is discoverable. You requested that I provide you further explanations (beyond those recited in our conversation and set forth in our papers) as to

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why the requested discovery is discoverable and /or relevant to the issues and proof contained in your Motion to Dismiss. However, since the Complaint and originally filed Brief contain the positions as to why, for example, the UCI has exclusive jurisdiction over these matters, I will not reiterate those in a separate document. You may consider our papers to be incorporated by reference herein.

Should you have any questions, please do not hesitate to write.

Very truly yours,

A handwritten signature in black ink, reading "Timothy J. Herman". The signature is written in a cursive style with a long horizontal flourish at the end.

Timothy J. Herman

TJH/ll