



*Preserving the integrity of competition. Inspiring true sport. Protecting the rights of athletes.*

VIA ELECTRONIC MAIL TO [REDACTED]

July 20, 2012

Tim Herman  
Sean E. Breen  
HOWRY BREEN & HERMAN, LLP  
1900 Pearl Street  
Austin, Texas 78705-5408

**Re: Lance Armstrong v. United States Anti-Doping Agency ("USADA"), et al.  
Cause No. 1:12-cv-00606-SS**

Dear Tim and Sean:

In follow up to our phone conversation this morning I wanted to give you some thoughts.

Defendants' desire is to have our motion to dismiss based on subject matter jurisdiction fully briefed and ready for disposition by the Court within the time frame provided by the Local Rules (i.e., by August 9).

Understandably, given our motion was filed yesterday, in our phone conversation this morning you were unable to precisely identify any discovery you think relevant to the pending motion to dismiss for lack of subject matter jurisdiction. I would invite you to precisely define your thoughts on discovery limited solely to the motion to dismiss at your earliest opportunity. For evaluative purposes it would probably be useful to have your position in writing.

We believe all necessary documents and information to resolve the jurisdictional motion are before the Court. However, if there is something you believe is needed from us please bring this to our attention as early as possible.

Although we organized a follow up call for Tuesday, I will be accessible to you over the weekend and on Monday if you would like to discuss these matters earlier.

Otherwise, I will look forward to our next call at 3 p.m. eastern on Tuesday, July 24, 2012.

Kind regards,

UNITED STATES ANTI-DOPING AGENCY

A handwritten signature in blue ink, which appears to read "William Bock, III".

William Bock, III  
General Counsel

WB/ljm

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***United States Anti-Doping Agency***

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