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January 22, 2007

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**VIA E-MAIL, FACSIMILE
AND REGULAR U.S. MAIL**

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Travis T. Tygart
Senior Managing Director and General Counsel
U.S. Anti-Doping Agency
1330 Quail Lake Loop, Suite 260
Colorado Springs, CO 80906-4651

Re: *USADA v. Floyd Landis, AAA Case No. 30 190 00847 06*
Second Request for Production of Documents

Dear Messrs. Tygart and Young:

Per our telephone conversation on January 18, 2007, this correspondence constitutes Floyd Landis' request for production of documents, which incorporates previously requested documents called for in Mr. Landis' First Request for Production of Documents.

To date, Mr. Landis has received no other document discovery from the United States Doping Agency ("USADA") other than those laboratory documents bates numbered USADA 0001 to 0370 contained within the document set referred to as the "lab package." Review of USADA 0001 to 0370 have revealed numerous discrepancies, inconsistencies and errors in laboratory procedure, handling of samples and interpretation that require an analysis that cannot be accomplished absent further document discovery. To accomplish that analysis, on October 16, 2006, Mr. Landis served upon USADA and the Union Cyclist International ("UCI")

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his First Request for Production of Documents ("First Request"). No documents were produced by USADA or the UCI in connection with that request. In an attempt to resolve these outstanding discovery issues, Mr. Landis now propounds the Second Request for Production of Documents, which incorporates and supersedes the previous and unanswered First Request.

As we discussed on our last call, this Second Request for Production of Documents does not yet include other written discovery, including interrogatories or requests for admission, nor does it detail the witness depositions, third-party or otherwise, that may need to be conducted. Per our discussion, obtaining these documents is a first step to conduct this discovery process in an orderly manner, and we look forward to setting a discovery cut-off with you in conjunction with the overall scheduling of the handling of this case.

II. SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

A. DEFINITIONS AND INSTRUCTIONS

As used herein, the following terms shall have the following meanings:

1. The terms "YOU," "YOUR" and "USADA" mean the United States Anti-Doping Agency, its representatives and agents and witnesses, as the case may be, and any other persons representing and/or acting on its behalf or at its direction.

2. The term "CONCERNING" and the term "RELATING TO" shall mean the same thing, that is referring to, alluding to, responding to, relating to, connected with, commenting on, in respect of, about, regarding, discussing, showing, describing, mentioning, analyzing, reflecting, evidencing, supporting, and/or constituting.

3. The terms "DOCUMENTS" or "DOCUMENTS" mean any handwritten, typed, printed, pictorial, or graphic matter, however produced or reproduced, of every kind and description, and any other tangible thing, including without limitation, any "writings," "originals," and "duplicates," as defined in California Evidence Code Sections 250, 255, and 260, and any facsimiles, electronic records, film records or productions. If a writing has been prepared in more than one copy and any copy was not - or is no longer - identical to the original (whether by reason of notations, modifications, alterations, or marginal notes, including those made on "Post-Its" or their equivalent), each non-identical copy must be included. For example, the term "DOCUMENT" includes, without limitation: records, correspondence, telegrams, notes, electronic mail, facsimiles, calendar pages, check lists, files, file folders, sound recordings, memoranda, reports, written analyses, contracts and their supplements, amendments, and modifications, licenses, agreements, illustrations, diagrams, instructions, photographs, films, videotapes, electronic or magnetic tapes, computer printouts, reports, books, job or transaction files, records of telephone conversations (including, without limitation, telephone bills and notes of such conversations), meetings or minutes of any meetings, drafts of the foregoing or anything

