

LAW OFFICES OF HOWARD L. JACOBS

November 1, 2006

VIA FACSIMILE

Travis Tygart
USADA
1330 Quail Lake Loop, Suite 260
Colorado Springs, CO 80906

Re: USADA v. Floyd Landis, Sample #995474

Dear Travis:

Thank you for your letter of today's date in the above-referenced matter. In response to your statement that I have failed to provide you with the basis for my assertion that your continued withholding of longitudinal documents prejudices Landis in his ability to prepare his defense, the following response is provided: (1) Landis would have requested these documents directly from the UCI had USADA not done so on August 7 and copied me on that letter; (2) to the extent that USADA relies at all on the T/E ratio in connection with this case, WADA Technical Document – TD2004EAAS requires the production of these documents; and (3) USADA's stated intention to produce these documents "at the very latest at the time [USADA's] exhibits are due" will preclude Landis from requesting any additional documentation that may become relevant as a result of the production of the longitudinal data, thus prejudicing Landis in the preparation of his defense.

While I agree with you that bates stamping will be useful, there is nothing preventing you from bates stamping the documents in the order that they are received.

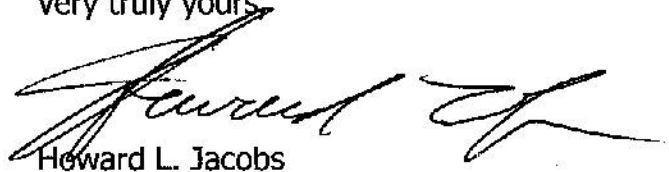
For the reasons stated above, we repeat our prior request that you send those responsive documents that are in your possession, as soon as possible. By copy

Travis Tygart
November 1, 2006
Page 2

to the UCI, it is requested that the UCI forward to me copies of all prior and subsequent test results, including the steroid profiles, that have previously been sent by the UCI to USADA in response to USADA's August 7, 2006 letter. It is further requested that copies of any additional documents produced by the UCI to USADA in response to this August 7, 2006 letter be simultaneously produced to me.

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

Very truly yours,



Howard L. Jacobs

cc: Mrs. Anne Gripper, UCI

5210 Lewis Road
Suite 5
Agoura Hills, CA 91301
USA

PHONE (818) 292-8735
FAX (818) 292-8736
ALT. FAX (818) 942-6079
E-MAIL howard.jacobs@yahoo.com
WEB SITE <http://www.athleteslawyer.com>
