

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANUCHA BROWNE SANDERS,

06 Civ. 0589 (GEL) (DF)

Plaintiff,

- against -

ECF CASE

MADISON SQUARE GARDEN, L.P., ISIAH
LORD THOMAS III and JAMES L. DOLAN,

AFFIDAVIT OF KEVIN T. MINTZER IN
SUPPORT OF PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT

Defendants.

----- X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

KEVIN T. MINTZER, being duly sworn, deposes and says:

1. I am a member of the firm Vladeck, Waldman, Elias & Engelhard, P.C., attorneys for plaintiff Anucha Browne Sanders ("plaintiff" or "Browne Sanders") in this action against Madison Square Garden, L.P. ("MSG"), Isiah Lord Thomas ("Thomas") and James L. Dolan ("Dolan"). I submit this affidavit in support of plaintiff's Motion For Partial Summary Judgment.

2. Attached hereto as Exhibit 1 are excerpts from the first day of plaintiff's deposition on November 27, 2006 and Browne Sanders Deposition Exhibit 11.

3. Attached hereto as Exhibit 2 are excerpts from the deposition of James L. Dolan and Dolan Deposition Exhibits 4 and 16.

4. Attached hereto as Exhibit 3 are excerpts from the deposition of Isiah Lord Thomas and Thomas Deposition Exhibit 4.
5. Attached hereto as Exhibit 4 are excerpts from the deposition of Stephen Mills and Mills Deposition Exhibits 1, 3, 4, 6, 7, 8, 11 and 16.
6. Attached hereto as Exhibit 5 are excerpts from the deposition of Rusty McCormack and McCormack Deposition Exhibit 8.
7. Attached hereto as Exhibit 6 are excerpts from the deposition of Stephon Marbury.
8. Attached hereto as Exhibit 7 are excerpts from the deposition of John Moran and Moran Deposition Exhibits 1,2, 3 and 4.
9. Attached hereto as Exhibit 8 are excerpts from the deposition of Rochelle Noel and Noel Deposition Exhibit 14.
10. Attached hereto as Exhibit 9 are excerpts from the deposition of Karin Buchholz and Buchholz Deposition Exhibit 1.
11. Attached hereto as Exhibit 10 are excerpts from the deposition of Dan Gladstone and Gladstone Deposition Exhibit 7.
12. Attached hereto as Exhibit 11 are excerpts from the deposition of Faye Brown.
13. Attached hereto as Exhibit 12 are excerpts from the deposition of Jeff Nix.
14. Attached hereto as Exhibit 13 are excerpts from the deposition of Robert Levy.

15. Attached hereto as Exhibit 14 are excerpts from the deposition of Peter Olsen and Olsen Deposition Exhibits 2 and 7.

16. Attached hereto as Exhibit 15 is a document produced by MSG reflecting the hiring of plaintiff by MSG in November 2000.

17. Attached hereto as Exhibit 16 is the Declaration of Jonathan Schindel, Esq., dated January 23, 2007.

18. Attached hereto as Exhibit 17 is a document produced by MSG that appears to be notes of John Moran's interview with Gary Winkler.

19. Attached hereto as Exhibit 18 is the Declaration of Marc Schoenfeld, Esq., dated March 2, 2007

20. Attached hereto as Exhibit 19 is an e-mail exchange between counsel for MSG and counsel for Browne Sanders on December 22 and December 23, 2005.

21. Attached hereto as Exhibit 20 is a letter from counsel for MSG to counsel for Browne Sanders dated December 30, 2005 (attached term sheet is omitted).

22. Attached hereto as Exhibit 21 is a letter from plaintiff's counsel to MSG's counsel dated January 20, 2006.

23. Attached hereto as Exhibit 22 is a letter from MSG's counsel dated February 28, 2007, concerning Mills Deposition Exhibit 8.

24. Attached hereto as Exhibit 23 are notes that appear to have been taken by John Moran at the interview of plaintiff by John Moran and Rochelle Noel on January 6, 2006.

25. On December 22, 2005, I participated in a meeting among attorneys for Browne Sanders and attorneys for MSG. At that meeting, Browne Sanders' counsel stated,

among other things, that Browne Sanders had been sexually harassed at MSG and provided MSG's counsel with information concerning Browne Sanders' claims.

26. Following the meeting, on December 22, 2005, Browne Sanders' counsel and MSG's counsel agreed to, inter alia, "attempt to expedite a negotiated, good faith resolution of Ms. Browne Sanders' claims." Counsel also agreed that their understanding with respect to settlement discussions was "confidential and deemed in furtherance of settlement pursuant to Fed. R. Evid. 408." See Exhibit 19 attached hereto.

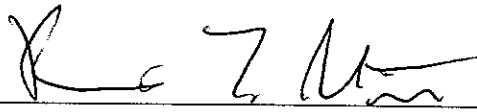
27. Pursuant to the parties' understanding of December 22, 2005, on December 27, 2005, Browne Sanders' counsel conveyed a settlement proposal to MSG's counsel in connection with Browne Sanders' sexual harassment claims against MSG. To the best of my knowledge, prior to this proposal, neither Browne Sanders nor anyone acting on Browne Sanders' behalf had made a monetary settlement or severance proposal to MSG.

28. On December 30, 2005, MSG's counsel delivered to plaintiff's counsel a letter that included a counter-offer to settle plaintiff's claims. The letter from MSG's counsel stated that MSG's counter-offer was being made pursuant to Fed. R. Evid. 408. The letter also stated that "MSG is ready, willing and able to continue as rapidly as possible our good-faith discussions in order to find a mutually acceptable resolution." See Exhibit 20 attached hereto (term sheet omitted)..

29. On January 3, 2006, plaintiff's counsel orally conveyed another settlement proposal to MSG's counsel.

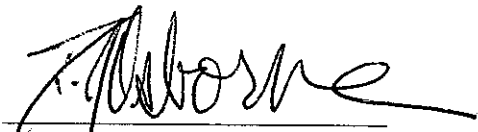
30. On January 19, 2006, MSG's counsel informed me that MSG's investigation of plaintiff's internal complaint had been concluded. In that same conversation,

MSG's counsel informed me that MSG was going to terminate Browne Sanders' employment, effective immediately. See Exhibit 21 attached hereto.



KEVIN T. MINTZER

Sworn to before me this
27th day of April, 2007.



Notary Public

R. J. OSBORNE
NOTARY PUBLIC, State of New York
No. 02056094970
Qualified in Queens County
Commission Expires June 2007

Exhibit 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

06 CV 0589 (GEL)

MADISON SQUARE GARDEN, L.P.,
ISIAH LORD THOMAS III and JAMES L. DOLAN,

Defendants.
-----X

VIDEOTAPED DEPOSITION OF ANUCHA BROWNE SANDERS

New York, New York

Monday, November 27, 2006

REPORTED BY:

BARBARA R. ZELTMAN

Job Number: 10954



David Feldman
Worldwide

From File to Trial.

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New York, NY 10022
(800) 642-1099

600 Anton Boulevard, 11th Floor
Costa Mesa, CA 92626
(866) DFW-1380

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1 ANUCHA BROWNE SANDERS
 2 A Yes. He would be incorrect.
 3 Q In fact it would not be true,
 4 would it?
 5 A It would not be true.
 6 Q Would it surprise you that
 7 Steve Mills would tell an untruth?
 8 A I am not a read of his
 9 character. If he did, he did. I don't
 10 know.
 11 Q You don't have a read of his
 12 character?
 13 A Not at this point, I sure
 14 don't.
 15 Q At any point, did you?
 16 A I thought I did.
 17 Q You thought he was a great
 18 guy, right?
 19 MS. VLADECK: Objection to
 20 form.
 21 A I thought he was smart and
 22 likeable.
 23 Q Not a great guy?
 24 MS. VLADECK: Objection to
 25 form.

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1 ANUCHA BROWNE SANDERS
 2 Do you want to define "great
 3 guy"?
 4 Q As you understand it. Never
 5 as I understand it.
 6 When I ask you a question,
 7 it's as you understand it. You know, if
 8 you have an understanding of the words
 9 "great guy," then you say it. If you
 10 don't have an understanding, I'll define
 11 it.
 12 MS. VLADECK: Objection to
 13 form.
 14 Q But I am not asking you
 15 supercalifragelisticexpialidocious.
 16 I am just saying "great guy,"
 17 whatever you think of as a great guy.
 18 MS. VLADECK: Objection to
 19 form.
 20 A I saw Steve as a professional.
 21 Q Not a great guy?
 22 MS. VLADECK: Objection to
 23 form.
 24 A I'm answering your question.
 25 I saw Steve as a professional.

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1 ANUCHA BROWNE SANDERS
 2 Q Do you understand the words
 3 "great guy"?
 4 A I wouldn't describe somebody I
 5 worked with as a "great guy" because I
 6 don't know them personally enough to
 7 define them that way. I think great guy
 8 goes well beyond professional.
 9 Q Okay. I can accept that.
 10 In November and December of
 11 '05, you caused members of your staff, did
 12 you not, to reconstruct the Petra Pope
 13 incident in a memo?
 14 MS. VLADECK: Objection to
 15 form.
 16 A You said members of my staff.
 17 Could you explain that?
 18 Q You don't know what the words
 19 "members of your staff" means?
 20 MS. VLADECK: Objection to
 21 form.
 22 A The answer to your question is
 23 no. It's plural.
 24 Q Plural?
 25 A I asked one member of my

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1 ANUCHA BROWNE SANDERS
 2 staff.
 3 Q Oh, oh, oh. I am not trying
 4 to fence with you.
 5 MS. VLADECK: Then please
 6 don't, Peter. Ask a question. And
 7 if she says she doesn't understand
 8 it, please rephrase it.
 9 MR. PARCHER: I am just trying
 10 to understand what's going on.
 11 A I just want to be careful that
 12 I don't say something that is incorrect.
 13 So you said "members," which is plural to
 14 me. And I asked one member of my staff.
 15 That's singular.
 16 Q It would be helpful if you
 17 raised my consciousness to that before I
 18 ask you the next question so I can get an
 19 misunderstanding.
 20 A Sure.
 21 Q And you're trying not to give
 22 me a misunderstanding, right?
 23 MS. VLADECK: Objection to
 24 form.
 25 Q Who did you ask?

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1 ANUCHA BROWNE SANDERS
 2 A His name is Gary Winkler.
 3 Q Why did you ask Gary Winkler
 4 in November of '05 to reconstruct an event
 5 that had happened over a year earlier?
 6 MS. VLADECK: Objection to
 7 form.
 8 A I wanted to make sure I had a
 9 record of it, as I was demanding that
 10 Steve deal with things.
 11 Q Didn't you have some desire to
 12 make sure that you had a record of this
 13 arm-pulling/screaming incident so that
 14 Steve could deal with things in November
 15 of '05?
 16 MS. VLADECK: Objection to
 17 form.
 18 A Not necessarily, no. Either
 19 it was something that happened to me that
 20 I recalled.
 21 Q Was it important to you, as
 22 you did with Winkler and Petra Pope, to go
 23 around to the different people that might
 24 have been in the corridor that night and
 25 say, "Did you see Isaiah pulling me"? That

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1 ANUCHA BROWNE SANDERS
 2 wasn't important to you?
 3 MS. VLADECK: Objection to
 4 form. Asked and answered.
 5 A You mentioned Petra Pope. She
 6 was gone from the business before.
 7 Q I am not talking about
 8 Petra Pope.
 9 MS. VLADECK: Then don't
 10 mention her.
 11 A And you mentioned her.
 12 Q I know, but now I'm talking
 13 about the arm-grabbing incident.
 14 A You referenced Petra Pope --
 15 MS. VLADECK: Objection to
 16 form.
 17 Q Do you understand my question?
 18 A No, I don't. Maybe you should
 19 ask it again.
 20 Q Are you instructing me to ask
 21 it again?
 22 A Yeah, I didn't understand it.
 23 MS. VLADECK: Normally, in the
 24 beginning when we say if you don't
 25 understand a question, ask me to

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1 ANUCHA BROWNE SANDERS
 2 rephrase or repeat it. And so she's
 3 asking you to rephrase it.
 4 Q If you don't understand the
 5 question I'm asking you, always, always,
 6 always ask me to repeat it. I will be
 7 very happy to do it. And if that isn't
 8 the look on my face, I would still be very
 9 happy to do it. I don't want you to
 10 ask -- answer a question that you don't
 11 understand. Not that I have seen you do
 12 that, but I don't want you to.
 13 I'm trying to find out whether
 14 at any time you checked around to find out
 15 whether you had any witnesses other than
 16 yourself to the incident that you are
 17 describing happened outside of the
 18 players' lounge and then inside the bike
 19 room, that we've been talking about.
 20 MS. VLADECK: Objection to
 21 form. Asked and answered three
 22 times.
 23 A No.
 24 Q Did you ever try to get a
 25 witness, to check anybody to see if they

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1 ANUCHA BROWNE SANDERS
 2 could help you, either because they saw
 3 the arm pull or because they heard the
 4 screaming and the cursing?
 5 MS. VLADECK: Objection to
 6 form. Asked and answered.
 7 A No.
 8 Q When that incident occurred,
 9 did you go to Steve Mills?
 10 MS. VLADECK: Objection to
 11 form.
 12 Q What incident?
 13 A Which incident are you
 14 referring to?
 15 Q The arm-pull/screaming.
 16 A Yes, I told Steve Mills after
 17 that weekend.
 18 Q Were you disturbed when you
 19 went to see him?
 20 A I told him that I was
 21 disturbed by it.
 22 Q You wouldn't make something
 23 up? You were disturbed, right?
 24 MS. VLADECK: Objection to
 25 form.

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1 ANUCHA BROWNE SANDERS
 2 A It was the first time he
 3 called me a ho. It wasn't the first time
 4 he called me a bitch.
 5 Q So it was the ho that drove
 6 you over the top? Or had you told Mills
 7 that you can't take him calling you a
 8 bitch earlier on?
 9 MS. VLADECK: Objection to
 10 form.
 11 A I had conversations with Steve
 12 as these were happening, and I told him
 13 that "the language is inappropriate. He's
 14 got to do something about this."
 15 Q So it was getting worse. You
 16 were telling Mills when you saw him, and
 17 yet the situation was getting worse,
 18 wouldn't you say?
 19 MS. VLADECK: Objection to
 20 form.
 21 A I would say the situation
 22 wasn't getting better.
 23 Q Well, the man went from bitch
 24 to ho, which is a thing which you said was
 25 most upsetting to you -- not that the

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1 ANUCHA BROWNE SANDERS
 2 other wasn't upsetting.
 3 So it was getting worse, no?
 4 MS. VLADECK: Objection to
 5 form.
 6 A All the profanity that was
 7 directed at me was bad.
 8 Q But it was getting worse, or
 9 was it the same all the time?
 10 A In this particular
 11 conversation, he was seething. He was
 12 spewing curses and seething over the
 13 phone.
 14 Q So it was getting worse?
 15 A So this one was particularly
 16 bad. Worse than the others.
 17 Q Thank you.
 18 Now, you called that
 19 meeting -- for that meeting?
 20 A Yeah.
 21 Q Okay. Now, what had prompted
 22 you to call Isiah --
 23 This is March 23rd, is it not?
 24 A Yes.
 25 Q What prompted you to call

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1 ANUCHA BROWNE SANDERS
 2 Isiah that day?
 3 A Frank Murphy came in my
 4 office, and we were -- I think it was to
 5 discuss player appearances, something
 6 around player appearances. And he started
 7 yelling at me. He said, "I don't like the
 8 way I've been treated here for two years,
 9 and now you are going to pay." And he
 10 said this standing over my desk as I was
 11 sitting at my desk. And he said, "If you
 12 want a relationship with Isiah, you are
 13 going to have to go through me." And he
 14 called me a "fucking bitch." I told him
 15 to get out of my office. And then I got
 16 on the phone with Isiah.
 17 Q Now, you say -- what did you
 18 say it had something to do with?
 19 A I think it was player
 20 appearances. It was player -- it
 21 certainly was player appearances,
 22 something around player availability.
 23 Q Excuse me just a second. When
 24 I turn my back it's because --
 25 Let me ask you something while

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1 ANUCHA BROWNE SANDERS
 2 we're waiting for Lisa to pull a document
 3 for me.
 4 Did it ever occur to you that
 5 you could have avoided meetings alone with
 6 Thomas if he was saying unpleasant things
 7 to you?
 8 MS. VLADECK: Objection to
 9 form.
 10 A I wasn't seeking him out.
 11 Q That's not what I'm asking
 12 you, in all candor.
 13 Did it ever occur to you,
 14 cross your mind, that since every time you
 15 saw this guy he was using profanity and/or
 16 cursing at you, and you said he wasn't
 17 doing it in front of other people, that
 18 you could avoid meeting with him alone?
 19 MS. VLADECK: Objection to
 20 form.
 21 A Yes, it did occur to me.
 22 Q Did you ever take it up with
 23 Steve Mills?
 24 A I think we decided later on
 25 that he would basically be -- that Steve

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1 ANUCHA BROWNE SANDERS
 2 MR. PARCHER: Right, Anne?
 3 MS. VLADECK: Very good.
 4 MR. PARCHER: One on 03666 is
 5 where it starts.
 6 You don't have to worry about
 7 that. I'm just reading the pages
 8 off.
 9 Q And I'm going to call your
 10 attention to something on 03667 and then
 11 ask you a question from later on.
 12 MS. VLADECK: Just for the
 13 record this is a plaintiff production
 14 as opposed to MSG.
 15 MR. PARCHER: Whatever you
 16 say.
 17 Q You see there you are writing
 18 down the Petra Pope -- so-called Petra
 19 Pope incident?
 20 Do you see that?
 21 MS. VLADECK: What page are
 22 you on?
 23 MR. PARCHER: It ends with 67.
 24 Second page.
 25 Q Do you see that there?

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1 ANUCHA BROWNE SANDERS
 2 A Yes.
 3 Which page are you referring
 4 to? The first one?
 5 Q No, the second page.
 6 Plaintiff's 06367.
 7 Do you see on the top right
 8 you referred to the Petra Pope incident?
 9 A Yes.
 10 Q Now, moving along on these
 11 pages, we'll go to the 15; so on and so
 12 forth -- and finally you end up on the
 13 19th of October on the very last page,
 14 03672.
 15 You got the last page? No,
 16 not that one. The one past that. You see
 17 on October 19, 2004 --
 18 MS. VLADECK: I'm sorry. Did
 19 you say October 19 -- oh, the last
 20 page of this exhibit.
 21 MR. PARCHER: Is October 19,
 22 2004. Starts on the 14th or maybe a
 23 little before.
 24 MS. VLADECK: Got it.
 25 Q We're down to the third item

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1 ANUCHA BROWNE SANDERS
 2 on the top left there. "Spoke to
 3 G Winter -- G Winkler.
 4 That's Gary Winkler, right?
 5 A Uh-huh.
 6 Q "About importance of following
 7 procedures and reporting anything
 8 inappropriate."
 9 A Yes.
 10 Q Do you see that?
 11 Now, that was around the Petra
 12 Pope incident.
 13 Do you recall a conversation
 14 with Gary Winkler being about reporting
 15 Petra Pope properly?
 16 MS. VLADECK: Objection to
 17 form.
 18 A Yes.
 19 Q And why was it important to
 20 follow procedures when reporting anything
 21 inappropriate?
 22 A The procedure I explained to
 23 him was to bring it to my attention, and
 24 that's what I told him.
 25 Q The procedure of the Garden is

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1 ANUCHA BROWNE SANDERS
 2 for him to bring it to your attention if
 3 he sees anything inappropriate?
 4 MS. VLADECK: Objection to
 5 form.
 6 A When I met with him and Petra,
 7 that's what I told him. If they are aware
 8 of anything inappropriate, please bring it
 9 to my attention. And that's what I'm
 10 referencing there.
 11 Q So the procedures that you
 12 were referring to, "the following
 13 procedures," you weren't referring to the
 14 procedures set forth by Madison Square
 15 Garden when something inappropriate
 16 occurred, were you?
 17 MS. VLADECK: Objection to
 18 form.
 19 A I wasn't referring to --
 20 what -- I was referring to what I deemed
 21 as the procedure, which was to bring it to
 22 your manager's attention.
 23 Q And nothing about the Garden's
 24 procedures, whatever they may have been?
 25 MS. VLADECK: Objection to

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1 ANUCHA BROWNE SANDERS
 2 form.
 3 A That wasn't discussed.
 4 Q Were you aware of what the
 5 Garden procedures were in reporting
 6 anything inappropriate?
 7 MS. VLADECK: Objection to
 8 form.
 9 A I understood the procedures
 10 as -- I understood the procedure as -- I
 11 understood the procedure was to bring it
 12 to your manager's attention. And that's
 13 what I was explaining to both Petra and
 14 Gary.
 15 Q Now, did Petra actually tell
 16 you that Isiah told her to go and flirt
 17 with the referees?
 18 A Yes. What she told me was
 19 that Isiah asked her to go into the
 20 locker -- go into the referees' locker
 21 rooms and make them, quote, "happy." And
 22 I asked her to tell me what that meant.
 23 And she said, "Well, it meant he wanted me
 24 to flirt with the referees."
 25 Q Now, I'm looking at your

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1 ANUCHA BROWNE SANDERS
 2 diary. I don't want to do a whole
 3 cross-examination here and have nothing to
 4 do ask you at the trial, if we go to
 5 trial.
 6 But here it says, "before the
 7 New York Knicks versus Nets game in
 8 Wilkes Barre, Petra Pope told me that
 9 Isiah Thomas had her, quote, 'serve,' end
 10 quote, the officials last year."
 11 You didn't mean last year, did
 12 you? You must have meant last night?
 13 A No.
 14 Q Last year?
 15 A I meant the season prior to,
 16 what she told me was that Isiah -- this
 17 was not the first time that Isiah asked
 18 her to do that. So referred to last
 19 season and also referred to that game at
 20 Wilkes Barre.
 21 Q This is a note of
 22 October 2004.
 23 Isiah wasn't at the Garden in
 24 2003, was he?
 25 MS. VLADECK: Objection to

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1 ANUCHA BROWNE SANDERS
 2 form.
 3 A He came in December of 2003,
 4 and it was during the season that he came.
 5 Q So the '03/'04 season is when
 6 it occurred?
 7 A It occurred during the '03/'04
 8 season --
 9 Q When?
 10 A Can I finish? It occurred
 11 during the '03/'04 season, and what she
 12 was telling me in October -- I think it
 13 was October 14th, what she was telling me
 14 was, at the Wilkes Barre game when we were
 15 playing -- I think we played the Nets that
 16 day -- she said to me, "This is what he
 17 has asked. This is not the first time he
 18 has asked me to do it. He's asked me to
 19 do it last season too."
 20 But she was telling me he
 21 asked her to do it at that game, and she
 22 didn't want to do it anymore.
 23 Q Did she specifically say to
 24 you that he was asking her to flirt?
 25 A I asked her what that meant,

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1 ANUCHA BROWNE SANDERS
 2 and she said, "He wants me to flirt with
 3 the officials."
 4 Q And you thought it was
 5 important enough that she told you this
 6 information to write it in your diary, did
 7 you not?
 8 MS. VLADECK: Objection to
 9 form.
 10 A I wrote it down.
 11 Q Well, is that because you
 12 thought it was important?
 13 MS. VLADECK: Objection to
 14 form. Asked and answered.
 15 A It was important. I thought
 16 it was important.
 17 Q Is there a reason you didn't
 18 write down in your diary that she said
 19 that she interpreted his request as asking
 20 her to flirt with the referees?
 21 MS. VLADECK: Objection to
 22 form and mischaracterizes.
 23 It says, "IT wanted her to
 24 flirt."
 25 If you read farther on in that

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1 ANUCHA BROWNE SANDERS
 2 MR. PARCHER: I accept that.
 3 I thought I did. I'm quite sure --
 4 if I didn't show it to you. I didn't
 5 show it to you.
 6 Q I will show it to you.
 7 In addition to these reports
 8 on Manuel and Gonsalves, you obtained
 9 something at or about that time from
 10 Dan Gladstone referring to a Marbury
 11 incident that had taken place in June or
 12 July of '05.
 13 Do you recall that?
 14 And you had him report to you
 15 on that as well?
 16 A Yes.
 17 MS. VLADECK: Objection to
 18 form.
 19 Q Do you?
 20 A Yes.
 21 Q And in addition to that -- I
 22 think we did discuss this, I might have
 23 showed it to you -- you had Gary Winkler
 24 give you a reporting in December '05 on
 25 the so-called Petra Pope, incident for

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1 ANUCHA BROWNE SANDERS
 2 lack of a better way of putting it.
 3 Do you recall that?
 4 A Yes.
 5 Q And were these reports
 6 prepared by you, at that time, to in
 7 any way aid you in this case?
 8 A No.
 9 Q It had nothing to do with
 10 thoughts on your part that you were going
 11 to either get a highly-lucrative severance
 12 from the Garden or else sue them?
 13 MS. VLADECK: Objection to
 14 form.
 15 A Not at all.
 16 Q Never crossed your mind at the
 17 time?
 18 MS. VLADECK: Objection to
 19 form.
 20 A No.
 21 Q So that in November of '05 --
 22 was there a time in November or December
 23 of '05 when you walked into Steve Mills'
 24 office and told him that you didn't want
 25 to work at the Garden anymore?

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1 ANUCHA BROWNE SANDERS
 2 MS. VLADECK: Asked and
 3 answered. Objection to form.
 4 A No.
 5 Q That you discussed your not
 6 working there anymore?
 7 A No.
 8 Q The subject of your not
 9 working there anymore never came up until
 10 after your counsel met with the people at
 11 the Garden?
 12 MS. VLADECK: Objection to
 13 form.
 14 A No. We didn't discuss that.
 15 Steve and I did not discuss me leaving the
 16 company.
 17 Q So that the necessity, in your
 18 mind, of revisiting, with Gary Winkler,
 19 Petra Pope was what?
 20 MS. VLADECK: Asked and
 21 answered. Objection to form.
 22 A I asked him to document it.
 23 Q Why did you ask him, in
 24 December, to document is something
 25 happened way back in October of the year

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1 ANUCHA BROWNE SANDERS
 2 before?
 3 A Because I wanted that
 4 documented because it was part of -- I
 5 expected that it would be denied.
 6 Q Denied by whom?
 7 A Isiah.
 8 Q Did you expect -- but you had
 9 Petra, though, didn't you?
 10 A No. Petra left the company.
 11 Q But she was a person who had
 12 told you what had happened, that he had
 13 improperly made her uncomfortable, asked
 14 her to go flirt with referees, didn't she?
 15 MS. VLADECK: Objection to
 16 form.
 17 A I'm sorry. I am not
 18 understanding.
 19 At that time?
 20 Q Petra Pope herself, back
 21 when -- in October of the year before, had
 22 herself told you what happened?
 23 A Yes.
 24 Q And you had reported it to
 25 Mills at that time, right?

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1 ANUCHA BROWNE SANDERS
 2 A Yes.
 3 Q And yet you saw the necessity
 4 of doing it again over a year later?
 5 MS. VLADECK: Objection to
 6 form.
 7 A Of documenting it, yes.
 8 Q Why did you see the necessity
 9 of documenting it in December of '05?
 10 A I thought it was important.
 11 Q Why?
 12 A I think it's important to
 13 document things.
 14 Q Why wasn't it important
 15 earlier to document these things?
 16 A There were a number of things
 17 going on right around that time, including
 18 a threat -- I think was at the time -- by
 19 Steve Mills. My insistence to Steve that
 20 he deal with the sexual harassment.
 21 Q This was the first time that
 22 you insisted to Mills? In November of
 23 '05 was the first time you insisted that
 24 he deal with sexual harassment?
 25 A It wasn't the first time, no.

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1 ANUCHA BROWNE SANDERS
 2 Q When was the first time?
 3 A I think -- I want to say
 4 January of 2005.
 5 Q And before that?
 6 A The verbal harassment on a
 7 regular basis.
 8 Q So between January of '05 and
 9 December of '05, you saw no need to insist
 10 that Steve deal with the sexual harassment
 11 business?
 12 MS. VLADECK: Objection to
 13 form. Mischaracterizes the
 14 testimony.
 15 A No. That's not what you asked
 16 me.
 17 Q Well, I don't understand. Can
 18 you explain that to me?
 19 A Are you asking me?
 20 Q Yes.
 21 A To explain -- you didn't ask
 22 me that question when I answered you
 23 before.
 24 Q So explain it to me now.
 25 A Well, you asked me was that

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1 ANUCHA BROWNE SANDERS
 2 the first time you insisted that I asked
 3 Steve to deal with the sexual harassment.
 4 And I said I insisted that he deal with
 5 the verbal harassment in 2004. And after
 6 he started professing his love to me at
 7 the end of 2004 and into 2005, I was very
 8 persistent with Steve in dealing with that
 9 as well.
 10 Q Now, we'll go back to --
 11 between October of '04 and December of
 12 '04, are there any incidents that
 13 occurred --
 14 A Say that again.
 15 Q Between October of '04, Petra
 16 Pope, and December of '04, that's the
 17 incident at Gate 1 -- I don't think you
 18 need your recollection refreshed -- but
 19 the incident where he tells you he's in
 20 love with you for the first time.
 21 Do you know what I'm referring
 22 to?
 23 MS. VLADECK: Objection to
 24 form. Mischaracterizes the
 25 testimony.

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1 ANUCHA BROWNE SANDERS
 2 A In December.
 3 Q Do you know what I'm referring
 4 to? I'll show you the document.
 5 A I'm aware of it.
 6 Q Between that period of October
 7 of '04 and December '04, were there any
 8 incidents that occurred between you and
 9 Isiah that were disturbing to you that you
 10 haven't told us about?
 11 A October of '04. Not that I
 12 can remember right now.
 13 Q Okay. So before we do
 14 December '04, let's go back to the
 15 infamous March '04 period of time.
 16 And where we left off quite a
 17 while ago, Murphy had come in to your
 18 office, he was vulgar towards you, it was
 19 something to do with player relations, it
 20 had nothing to do with Leonard Lewin and
 21 you had called for a meeting between you,
 22 Steve Mills and Isiah, right?
 23 MS. VLADECK: Objection to
 24 form.
 25 A Yes. In March.

From: Browne Sanders, Anucha
Sent: Monday, November 28, 2005 1:02 PM
To: Mills, Steve
Subject: RE: Hassan Gonsalves

Hi Steve,
I just met with [REDACTED] to ask her specifically what her experience has been with Hassan Gonsalves. [REDACTED] said that she has become very uncomfortable with Hassan. Here are some of the comments that were said to her by Hassan:
"I want you to fuck me. When are you coming to my apartment"
"I want you to suck my dick"
"I talked to Stephon and he said to tell you to stop playing"
This past weekend Hassan sent [REDACTED] a text message which said "When can I stick it in"

I would like to terminate Hassan today. He will be here this afternoon at 5:00 pm.

-----Original Message-----

From: Browne Sanders, Anucha
Sent: Monday, November 28, 2005 12:31 PM
To: Mills, Steve
Subject: Hassan Gonsalves

Steve

Need to address some issues that I discussed with you regarding Hassan. It was brought to my attention that he has made a number of inappropriate comments to women on the staff.

To [REDACTED] Sat in her office cube and said "I hear you give good head"
Hunter brought this to my attention this morning as [REDACTED] told him last week. A number of other things have been said to [REDACTED]. This one was specifically brought to Hunter's attention last week.

To [REDACTED]: "You look good, you look good, I bet that pussy is good too"
[REDACTED] brought this to Karin Buchholz's attention and Karin relayed it to me this morning. [REDACTED] said that if it were anyone else, she would have said something sooner but since it was Stephon's cousin, she didn't feel that she could say anything.

[REDACTED] has told me that he put his hands on her waist and her leg and she told him to keep his hands off of her.

[REDACTED] brought to my attention that Hassan routinely rolls down the windows of the Groove Truck and give "cat calls" to women on the street.

Other members of the staff (Dan Gladstone, Courtney Carter) have said that Hassan routinely says that he can do anything he wants and that if he doesn't like something all he needs to do is call Isiah or Steve and he gets whatever he wants.

Steve, I have a meeting with you this afternoon. Let's discuss how we should proceed.

Thank You

Anucha Browne Sanders
Senior Vice President
Marketing and Business Operations
New York Knicks
212-465-6432

REDACTED



MSG 00250

CONFIDENTIAL

From: Browne Sanders, Anucha
Sent: Monday, November 28, 2005 2:49 PM
To: Moran, John VP ER MSG
Subject: FW: Hassan Gonsalves

REDACTED

-----Original Message-----

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Thank You

Anucha Browne Sanders

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MSG 00251

CONFIDENTIAL

Senior Vice President
Marketing and Business Operations
New York Knicks
212-465-6432

CONFIDENTIAL

MSG 00252
