

Exhibit 10

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 Civ. 0589 (GEL-XDR)

-----x

ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

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

Defendants.

-----x

October 30, 2006

10:00 a.m.

VIDEOTAPE DEPOSITION of DAN
GLADSTONE, taken by the Plaintiff,
pursuant to Notice, held at the offices of
Vladeck Waldman Elias & Engelhard, P.C,
1501 Broadway, New York, New York, before
Debbie Zaromatidis, a Shorthand Reporter
and Notary Public of the State of New
York.

1. GLADSTONE

2 night staff. Everybody who has these part
3 time jobs if there is ever a full time
4 posting position they are interested.

5 There are people who have a day time job
6 or full time job that still want to get a
7 position with the Knicks.

8 Q. It is a coveted position to be
9 able to be with the Knicks on a full-time
10 basis?

11 A. Sure.

12 Q. Is that fair to say?

13 A. It's fair to say.

14 Q. Who told you about Mr. Gonsalves
15 and Mr. Ward's hiring?

16 A. Anucha.

17 Q. And what did she say to you
18 about it?

19 A. They're -- they're being hired.
20 They'll be under your report on the street
21 team.

22 Q. Did she say anything else about
23 it?

24 A. Not so much. That they
25 were -- connected -- related to Stephon

1. GLADSTONE

2 Marbury.

3 Q. Did she tell you that they were
4 being hired because they were related to
5 Stephon Marbury?

6 A. That's correct.

7 Q. Did you have any particular
8 reaction to that?

9 A. Happy to get extra staff, happy
10 to get some -- some manpower so to speak
11 or just some hands, but I would have liked
12 to have been in the hiring process. I
13 would have liked to be able to hire who
14 would be my direct reports.

15 Q. Did you express that to
16 Ms. Browne-Sanders?

17 A. Yes.

18 Q. And what did he she?

19 A. That's -- it is what it is. You
20 have to manage the situation. I'm sure
21 you'll do well.

22 Q. Did she sell you that she had no
23 choice in taking these people on?

24 A. I don't remember her exact
25 words, but she -- along those lines.

1. GLADSTONE

2 told him that that was inappropriate,
3 right?

4 A. That's correct.

5 Q. Did you ever discuss that
6 subject with Stephon Marbury, the fact
7 that you had admonished Mr. -- Mr.
8 Gonsalves?

9 A. I believe so.

10 Q. And what was the sum and
11 substance of your conversation with Mr.
12 Marbury; what did he say, and what did you
13 say?

14 A. There was a phone call that
15 Stephon Marbury called me and was
16 displeased about the salary for his -- his
17 relative. He wasn't happy with the salary
18 or his hours or his parking or just
19 Hassan -- Hassan wasn't happy with his job
20 and what he was doing. So I guess that
21 was Hassan told Stephon. Stephon called
22 me to express that he wasn't pleased with
23 the situation as it was, and in that
24 discussion is where I tried to explain,
25 well, here is -- here is how it is. Here

1 GLADSTONE

2 the -- here's what the job is. Here's
3 what it entails. Here is the salary.
4 Here is the hours. Here is kind of what's
5 acceptable, what's not acceptable.

6 Q. You explained this to Mr.
7 Marbury?

8 A. I did.

9 Q. Do you -- do you talk to Mr.
10 Marbury regularly as part of your job?

11 A. No.

12 Q. Can you say approximately how
13 many conversations you have had with him?

14 A. Maybe four to five.

15 Q. And he is the Knicks -- one of
16 the Knicks star players, correct?

17 A. That's correct.

18 Q. So it's generally a pretty
19 memorable event for you to speak to him,
20 correct, especially --

21 A. We speak at work. If it's a
22 Knicks appearance, if he is at a Knicks
23 camp, we will discuss the event and the
24 appearance and what to expect of him, and
25 we will do what he does.

GLADSTONE

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Q. Had you ever called you --

3

A. He had not.

4

Q. -- prior to the telephone that
5 you are just referring to?

6

A. He had not.

7

Q. So that was unusual?

8

A. That was very unusual to get a
9 call.

10

Q. And did Mr. Marbury say anything
11 else in this telephone call other than
12 what you've already said?

13

A. He did. He was extremely
14 hostile, and he had many derogatory things
15 to say about Anucha.

16

Q. How is that Mr. Browne-Sanders
17 came up in the conversation?

18

A. I explained to Stephon that
19 Anucha is the boss, and she runs our
20 office, and she determines salaries. She
21 sets the structure that's in place, and
22 basically she -- she is in charge.

23

Q. What did -- what did Mr. Marbury
24 have to say in response to that?

25

A. I don't know if it was in

1. GLADSTONE

2 response to that or it was just his
3 personal opinion. He just -- he had many
4 negative things to say about Anucha.

5 Q. What specifically did he say?

6 A. I can't recall exact specifics,
7 but there were some hostile curse words
8 and not so flattering language.

9 Q. Do you recall anything
10 specifically that he said?

11 A. He called her a bitch. He
12 called her -- racial black bitch. I think
13 he used the F word to describe her.

14 MR. MINTZER: Can you mark this
15 as Exhibit 7.

16 (Gladstone Exhibit 7 marked for
17 identification.)

18 MR. SHERWOOD: Can we take a
19 break for a minute?

20 MR. MINTZER: Can I ask a
21 couple of questions on this, and then we
22 can take a break?

23 MR. SHERWOOD: I think I would
24 like to take a break for a minute.

25 MR. MINTZER: If you're

1. GLADSTONE

2. insisting.

3. MR. SHERWOOD: I am not going
4. to ask him any questions relating to the
5. exhibit.

6. MR. MINTZER: Okay. I am happy
7. to accomodate that.

8. MR. SHERWOOD: I appreciate
9. that.

10. THE VIDEOGRAPHER: The time is
11. 3:06 p.m. We are going off the record.

12. (Recess taken.)

13. THE VIDEOGRAPHER: Okay. The
14. time is 3:13 p.m. We are back on the
15. record.

16. Q. Mr. Gladstone, I have given you
17. a document that's marked -- been marked as
18. Gladstone 7. It is a three-page document.
19. It is Bates stamped MSG 6176 and then the
20. next two Bates stamps are cut off in the
21. copying, but they are 6177 and 6178.

22. Have you had a chance to review
23. this document?

24. A. I have.

25. Q. The -- the E mail on the top of

GLADSTONE

1
2 the first page, 6176, is that an E mail
3 that you sent to Ms. Browne-Sanders on
4 November 28, 2005?

5 A. That's correct.

6 Q. And do you remember writing this
7 E mail?

8 A. I do.

9 Q. And what were the circumstances
10 of your writing this E mail?

11 A. Anucha had asked for me to give
12 her as much documentation regarding Hassan
13 Gonsalves, this Stephon phone call, and
14 Vernon Manuel.

15 Q. Okay. Had you had any
16 conversation with Mr. --
17 Ms. Browne-Sanders in June about your
18 conversation with Mr. Marbury?

19 A. I did.

20 Q. And could you tell me what was
21 said in that conversation back into June?

22 A. Well, to the best of my ability.
23 She -- I called her after I had got off
24 the phone with Stephon Marbury and told
25 her that I just had a phone call where

1 GLADSTONE

2 referred to her as a black bitch?

3 A. I believe so. That was pretty
4 clear in my head.

5 Q. Did Ms. Browne-Sanders have any
6 reaction to that?

7 A. She was not pleased.

8 Q. Did she say anything or did she
9 just say I am not pleased?

10 A. I don't recall the conversation.
11 Just that it was not -- it was not a high
12 point career discussion talking about
13 this -- this kind of language.

14 Q. Did you have any further
15 conversation with her about Mr. Marbury's
16 call to you at that point in June?

17 A. No, not that I can recall.

18 Q. And how did it come to be that
19 in November you were writing an E mail
20 about the substance of the call?

21 A. That's actually a good question.
22 I -- I was pretty surprised that all this
23 information -- she needed this
24 information. It was -- seemed apparent to
25 me that she was getting as much

1. GLADSTONE

2 information together as she could about an
3 uncomfortable situation. She was not
4 happy with the Vernon Manuel situation.
5 She wanted me to document everything about
6 that, and she wanted me to document pretty
7 much everything that I had experienced or
8 witnessed that seemed out of the ordinary.

9 Q. And as part of that, she had
10 asked you to document your -- your call
11 with Mr. -- Mr. Marbury in June?

12 A. I believe so.

13 Q. And as a result of that
14 direction, that's what you produced as the
15 top E mail in Gladstone 7?

16 A. That's correct.

17 Q. There are several items in
18 quotation marks in your E mail under the
19 heading "all referring to Anucha."

20 Do you have a recollection of
21 Mr. Marbury saying all those things that
22 are in quotations?

23 A. I do.

24 Q. The third bullet point refers to
25 a quote that Mr. Marbury said "We don't

1. GLADSTONE

2 like her. She thinks she tells us what to
3 do. She don't tell us shit."

4 Did you have any understanding
5 about the we Mr. Marbury was referring to
6 in that sentence?

7 A. I'm not sure.

8 Q. Did you -- did you ask him?

9 A. I didn't.

10 Q. Did you know whether he was
11 referring to the other players?

12 A. It could have been the players.
13 It could have been his family. I don't
14 know.

15 Q. Do you know whether he could
16 have been referring to Mr. Thomas?

17 A. I don't know.

18 Q. Do you know whether Mr. Marbury
19 and Mr. Thomas have a -- have a close
20 relationship?

21 A. Apparently so. I read that in
22 the newspaper.

23 Q. You don't know anything more
24 about that than what you read in the
25 newspaper?

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GLADSTONE

A. That's correct.

Q. Is that fair to say?

A. That's correct.

Q. You -- you wrote in the last paragraph of that E mail "The conversation was more detailed, but to the best of my ability those are the only exact phrases that I can recall." And then you went on to say "I did call you that night to give you a heads up that Stephon was angry with the situation and that Stephon had some hostile things to say about members of Knicks management. "

Do you see that?

A. I do.

Q. You didn't refer to the conversation that you had had with Ms. Browne-Sanders a couple of days after your call with Mr. Marbury?

A. I'm not sure what the question is.

Q. In your E mail you didn't refer -- you testified just a little while ago that you had -- after that night you

1. GLADSTONE

2 had had a couple of days later a
3 conversation with Ms. Browne-Sanders about
4 that subject?

5 A. That's correct.

6 Q. And that's not reflected in your
7 E mail, correct?

8 A. It doesn't -- no.

9 Q. Any particular reason why that's
10 not reflected in your E mail?

11 A. It didn't. I don't think it was
12 relevant. I think she asked me the
13 conversation that I had with Stephon.

14 Q. The phrases in quotations --

15 A. Yes.

16 Q. -- is it your testimony that you
17 had previously told Ms. Browne-Sanders the
18 substance of these quotations back in
19 June?

20 A. I don't remember the exact
21 words, but I remember we -- I told her
22 about the disparaging remarks.

23 Q. Well, did you just refer to them
24 generally as disparaging remarks or were
25 you more detailed about it?



Unknown

From: Gladstone, Dan
Sent: Monday, November 28, 2005 6:27 PM
To: Browne Sanders, Anucha
Cc: Buchholz, Karin
Subject: Staffing issues - MARBURY

Importance: High

Attachments: - Staffing memo(June 16).doc

Anucha

As per your request, I am submitting some comments made by Stephon Marbury from a phone conversation that happened this summer in June (perhaps June 16th at 9 PM in the evening) when he called me on my cell phone to comment on events that transpired as mentioned below in the attached email as pertaining to his cousin, Knicks staffer Hassan Gonsalves:

- Stephon was upset that he felt his family member, Hassan, was being treated unfairly by Knicks management
- Stephon was not happy with the salary range for his cousin Hassan.
- I explained the timesheets and payroll process, and that Hassan would not be assigned to work more than 35 hours per work nor would he be assigned to work overtime and Hassan's salary was determined by Knicks management.
- I explained that Hassan was not granted a parking spot at 31st street garage and I did not approve him using my access code nor was I aware he was forging my signature to park his vehicle.
- Stephon was upset at these circumstances and expressed extreme displeasure at the Knicks front office staff, particularly mentioning Anucha
- Though time has passed, several comments I can recall Stephon making include:

all referring to Anucha

- "No one likes that black bitch"
- "Fuck that black bitch, she thinks she runs the Knicks, she don't run shit. I sell the tickets around here, not her, I put people in seats, this is my team."
- "We don't like her, she thinks she tells us what to do, she don't tell us shit"
- "Fuck that black bitch, she ain't shit and we'll see what happens this year"

the conversation was more detailed but to the best of my ability those are the only exact phrases I can recall. I did call you that night to give you a head's up that Stephon was angry with the situation and that Stephon had some hostile things to say about members of Knicks management.

sincerely

Dan Gladstone

—Original Message—

From: Gladstone, Dan
Sent: Thursday, June 16, 2005 1:13 PM
To: Browne Sanders, Anucha
Cc: Buchholz, Karin
Subject: Staffing issues
Importance: High

Anucha

As per your request - here are 2 issues that occurred this week that need to be brought to your attention regarding Knicks Field Marketing staffer Hassan Gonsalves:

- **Time Sheets** - over the period of Hassan's employment (hired October 2004) he has had trouble completing his bi-weekly administrative time sheets properly (submitting to me for approval, for me to sign, and then submitting to payroll to process on time so that Hassan would receive a paycheck). I have had to return at least 6 timesheets for

Hassan to re-do and properly submit to me for approval/signature in order to reflect the proper time/hours worked on Knicks events, and as a result often Hassan has not had his timesheet submitted to payroll in order in time to get his check the following week. Recently Hassan again submitted a timesheet reflecting overtime he was not approved to work - I made a change in his hours to reflect what he WAS approved to work and submitted to payroll for him so that he would be paid on time to expedite the process. On this occasion, I submitted the timesheet and send it back to Hassan to correct, because I wanted to get it to payroll in a timely manner so he would be paid the following week.

- **Parking** - it has come to my attention through the managers at Central parking system that Hassan has been using my parking account (#3-6-9) for the 31st street lot to park his own personal vehicle on a frequent basis under my name. I did not approve nor give out my account to Hassan to park his car on my account nor use my code. In fact, I have been extremely clear to Hassan that he is NOT to drive nor EVER be behind the wheel of a MSG vehicle as the result of a background check on his driver's license which resulted in him not being permitted or legal to drive company vehicles, thus it is extremely important that he does not park on the company account as we could be liable for an accident that occurs in the lot or associated with him parking and driving under the Knicks.

Moving forward, I have attached a DRAFT of a memo I wanted to present to both Tasheem Ward & Hassan Gonsalves to meet with them and re-enforce the nature of their employment status with the Knicks...please review and let me know how to proceed. I can also forward a copy of this memo to HR to approve or comment on...please advise....



Staffing memo(June
16).doc

Thank you.

Dan Gladstone
New York Knicks
Director, Community Relations & Field Marketing
2 Penn Plaza - 14th Floor - New York, NY 10121

w# (212) 465-6411

f# (212) 465-6047

get your Knicks tickets at ny.knicks.com

MEMO

TO: Tasheem Ward
Hassan Gonsalves

FR: Dan Gladstone

CC: Anucha Browne Sanders
Karin Buchholz

RE: Employment Guidelines

DT: 6/16/05

The following is a memo to outline and summarize the basic parameters of your employment:

You are employed in the New York Knicks Community Relations Department / Field Marketing with an annual salary of \$30,300.

Time Sheets: In order to receive paychecks, you must complete and submit a **bi-weekly administrative time sheet** to Dan Gladstone to review and approve with signature, this timesheet should then be copied (with a copy going to Dan Gladstone) and submitted to the payroll department to be processed.

You will be responsible to work **thirty five (35) hours per week**, seven (7) hours per day (Monday – Friday) or any combination of hours that equal but does not go above thirty five (35) hours per week. If you are scheduled to work weekend events or 7 days per week, the total scheduling of your hours will never exceed thirty five (35) hours per week.

Scheduling: You will receive your work schedule – assignment of events that total thirty five (35) hours per week – in a weekly meeting with Dan Gladstone that will be scheduled based on the event calendar.

Exhibit 11

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 FAYE BROWN

New York, New York

Wednesday, February 14, 2007

REPORTED BY:

BARBARA R. ZELTMAN

JOB NO. 11799



David Feldman
Worldwide

From File to Trial.

805 Third Avenue, 8th Floor
New York, NY 10022
(800) 642-1099

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

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1 FAYE BROWN
 2 Q Was that person someone who
 3 worked at the Garden?
 4 MR. MINTZER: Objection to
 5 form.
 6 A I don't remember.
 7 Q And your testimony is that no
 8 kids were playing in the game?
 9 A No.
 10 Q What was Mr. Thomas wearing?
 11 A What?
 12 Q What was Mr. Thomas wearing?
 13 A I don't remember. I don't
 14 recall right now.
 15 Q You don't recall what he was
 16 wearing?
 17 MR. HERNSTADT: Asked and
 18 answered.
 19 A No.
 20 Q Do you recall what the person
 21 who you believed may have been Jordan
 22 Schlachter was wearing?
 23 A Yeah, I think he -- I
 24 believe -- I don't want to speculate.
 25 Q What about the fourth person,
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1 FAYE BROWN
 2 do you recall what the fourth person was
 3 wearing?
 4 A No, I don't.
 5 Q Did you watch the entire game
 6 of -- you know what Horse is, right, play
 7 basketball?
 8 A Yes.
 9 Q Did you watch the entire game
 10 of Horse from the start to the end?
 11 A Yes.
 12 Q And what do you recall happened
 13 in terms of the game?
 14 MR. MINTZER: Objection to
 15 form.
 16 A It was fun.
 17 Q Who shot first?
 18 A I think Jordan did.
 19 Q And who followed Jordan?
 20 A Anucha.
 21 Q And who followed Anucha?
 22 A No, I think it was Jordan, the
 23 person whoever, Anucha and Isiah. That's
 24 how it was.
 25 Q And you said at what point --
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1 FAYE BROWN
 2 Well, who went out of the game
 3 first?
 4 A Jordan, I think.
 5 Q He shot after Mr. Thomas?
 6 A Yes.
 7 Q And who went out second?
 8 A I don't remember.
 9 Q Who won the game?
 10 A I think Mr. Thomas. Isiah.
 11 Q Do you remember who Mr. Thomas
 12 beat to win the game?
 13 A I think it's the person --
 14 sorry.
 15 Can you ask that again?
 16 Q Who did Mr. Thomas beat to win
 17 the Horse game?
 18 A I think it was between, like,
 19 Anucha and that other player. I don't
 20 remember who the other player is, though.
 21 Q So you don't recall whether
 22 Mr. Thomas beat Anucha or whether Mr.
 23 Thomas beat the other player?
 24 MR. MINTZER: Objection to
 25 form.
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 805 Third Avenue, New York, New York 10022 (212)705-8585

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1 FAYE BROWN
 2 A Overall, he won the game.
 3 Q And you don't recall who the
 4 last person was who he won the game over;
 5 is that right?
 6 MR. MINTZER: Objection to
 7 form.
 8 A I don't want to speculate.
 9 MR. CESARATTO: Why don't we
 10 change the tape.
 11 THE VIDEOGRAPHER: Time is
 12 12:46. Going off the record. This
 13 marks the end of Tape 1.
 14 (A brief recess was
 15 taken.)
 16 THE VIDEOGRAPHER: Time is
 17 12:48. Back on the record.
 18 This marks the beginning of
 19 Tape 2.
 20 Q What did you observe Mr. Thomas
 21 do that you believe was inappropriate?
 22 A The way he looked at Anucha.
 23 Q And how did he look at Anucha
 24 that you believed was inappropriate?
 25 A Well, he was, like, looking at
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1 FAYE BROWN
 2 her from the back.
 3 Q And when he was looking at her
 4 from the back, where was she?
 5 A She was shooting.
 6 Q She was shooting from where on
 7 the court?
 8 A Baseline. Side shot.
 9 Q She was shooting from the
 10 baseline on one of the sides of the
 11 basket?
 12 A Yes.
 13 Q And was that on the side where
 14 you were standing, or were you standing
 15 on the opposite side?
 16 A I was standing, like, right by
 17 the basket.
 18 Q So you were standing underneath
 19 the backboard?
 20 A What did you say?
 21 Q Were you standing underneath
 22 the backboard when Mr. Thomas, you say,
 23 was looking at her from behind while she
 24 was shooting?
 25 A Yes. Uh-huh.

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1 FAYE BROWN
 2 Q You were underneath the
 3 backboard?
 4 A Right.
 5 Q Ms. Browne Sanders was shooting
 6 along the baseline on one of the sides of
 7 the court?
 8 A Right.
 9 Q And then Mr. Thomas was
 10 standing behind her?
 11 A Right.
 12 Q Was he next in line to shoot?
 13 A If she made it.
 14 Q If she made it.
 15 And how far behind Ms. Browne
 16 Sanders was Mr. Thomas standing while she
 17 was shooting?
 18 A She was shooting probably,
 19 like, where Ed is, right now to the table.
 20 Q So about six, seven feet?
 21 MR. HERNSTADT: It's more
 22 like four or five feet.
 23 MR. CESARATTO: I don't
 24 think so, actually. I think this
 25 table is four feet wide.

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1 FAYE BROWN
 2 Q Was it greater than the width
 3 of this table?
 4 A Approximately, like, around
 5 there.
 6 Q And how far out along the
 7 baseline was Ms. Browne Sanders shooting
 8 the shot?
 9 A Well, it was a side shot.
 10 Q Was she outside -- was she out
 11 near the three point line, or was she in
 12 closer than that?
 13 A She was a little in closer than
 14 that.
 15 Q Was anyone else standing behind
 16 her other than Mr. Thomas?
 17 A No. That I can recall, no.
 18 Q Where were the other players?
 19 A They were, like, watching,
 20 like, on the -- well, yeah, they were
 21 just watching --
 22 You want to know exactly where?
 23 Q Where on the court were they?
 24 A I think another person was
 25 getting the rebound. So someone was,

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1 FAYE BROWN
 2 like, near the other side of the baseline
 3 area.
 4 Q And what specifically did you
 5 observe Mr. Thomas do that you felt was
 6 inappropriate?
 7 A Well, he looked at her up and
 8 down like -- and he was flirting.
 9 Q Well, he was behind her?
 10 A Right.
 11 Q So she couldn't see him while
 12 she was shooting?
 13 A Right.
 14 Q So she's shooting the basket,
 15 he's behind her?
 16 A Right.
 17 Q So how was he flirting with her
 18 if she can't see him?
 19 A Well, I saw him.
 20 Q You saw him.
 21 But how is it he was flirting
 22 with her if she could not see him?
 23 Was there something else that
 24 he did that caused you to believe he was
 25 flirting with her?

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1 **FAYE BROWN**
 2 MR. MINTZER: Objection to
 3 form.
 4 MR. HERNSTADT: Objection to
 5 form and compound.
 6 A So you want to know the
 7 question --
 8 Q Did he say anything to her
 9 while he was looking her up and down?
 10 A No.
 11 Q So other than him looking her
 12 up and down, that's your basis to say
 13 that he was flirting; is that correct?
 14 A No. He was looking at her like
 15 flirting. I mean it was like he was
 16 eyeing her up and down and he was like --
 17 Q As he's watching her shoot?
 18 A Yes.
 19 Q And did she make the shot?
 20 A Yes, she did.
 21 Q Other than her looking her up
 22 and down, did he take any -- did you
 23 observe him do anything else that caused
 24 you to believe he was flirting with her?
 25 MR. HERNSTADT: And other
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 805 Third Avenue, New York, New York 10022 (212)705-8585

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1 **FAYE BROWN**
 2 than the facial expression that
 3 indicated.
 4 Q What facial expression?
 5 A Like, he bit his lip a little
 6 bit. He bit his lip and he looked her up
 7 and down. And that's like -- I can tell
 8 if someone is, like, checking someone
 9 out. That's what that was to me.
 10 Q And did she make the shot?
 11 A Yes.
 12 MR. MINTZER: Asked and
 13 answered.
 14 MR. HERNSTADT: Asked and
 15 answered.
 16 Q And did he shoot next?
 17 A Yes.
 18 Q Did he move up to the spot
 19 where she shot?
 20 A Yes.
 21 Q And did he make the shot?
 22 A Yes.
 23 Q And did anybody say anything
 24 when she made the shot?
 25 A Well, yeah, it was competitive.
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1 **FAYE BROWN**
 2 So everyone was like "yeah, all right,
 3 oh, oh." Comments like that.
 4 Q Did he say that?
 5 A Did he say?
 6 Q Did he say, "Oh, oh, I'm in
 7 trouble, I need to make this shot" or
 8 anything like that?
 9 MR. HERNSTADT: Objection.
 10 MR. MINTZER: Objection.
 11 MR. HERNSTADT: I think you
 12 have to first establish if he said
 13 anything.
 14 A It was, like, a smile.
 15 Q So he smiled when she made the
 16 shot?
 17 A Yes.
 18 Q Did he say anything?
 19 A I mean, you saw his lips
 20 moving, but, like, I don't know.
 21 Q So you saw his lips moving, but
 22 you didn't hear him saying anything?
 23 A Right. I didn't hear him say
 24 anything.
 25 Q Had you ever watched -- well,
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1 **FAYE BROWN**
 2 how long after that did the game go on
 3 for?
 4 A Probably, like, ten to fifteen
 5 minutes, I think. Ten minutes.
 6 Q Prior to that time, had you
 7 ever watched Isiah Thomas play
 8 basketball?
 9 A Like?
 10 Q When he played for the NBA?
 11 A Yes.
 12 Q Had you ever watched him play
 13 basketball since he was at Madison Square
 14 Garden -- since he got hired at Madison
 15 Square Garden?
 16 A I don't think so. No, I don't
 17 recall, no.
 18 Q And when he took the shot that
 19 Anucha had just made, was he still biting
 20 his lip?
 21 A Un-un. No.
 22 Q Do you know whether or not he
 23 bites his lip when he plays basketball?
 24 A I am not sure, no.
 25 Q Is it possible that he bites
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1 FAYE BROWN
 2 yell at me. Frank, do not yell at me.
 3 Do not stand over me." That's what she
 4 kept on saying.
 5 Q What F word did you hear?
 6 A F-U-C-K.
 7 Q And what B word did you hear?
 8 A B-I-T-C-H.
 9 Q When you heard these words, was
 10 the door to Ms. Sanders' office open or
 11 closed?
 12 A It was open.
 13 Q And did you hear those words as
 14 you walked by, or while you were sitting
 15 at your secretary's station?
 16 A When I walked by.
 17 Q When you walked by, where did
 18 you go to?
 19 A I kind of stayed right out at
 20 the hallway.
 21 Q And so did you listen in on the
 22 conversation?
 23 A No.
 24 Q Well, why did you stop in the
 25 hallway?

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1 FAYE BROWN
 2 A Because I wanted to find out
 3 what was going on because I saw him
 4 walking kind of upset. So I wanted to
 5 find out, like, okay. And I kind of
 6 stayed around to make sure, and I just
 7 passed and I went in the hallway and then
 8 I just came back.
 9 Q When you came back, was
 10 Mr. Murphy still in Ms. Sanders' office?
 11 A Yes.
 12 Q How long after they came back
 13 did their conversation continue?
 14 A Probably like a set down and
 15 then like probably two to three minutes
 16 after.
 17 Q So how long was the entire --
 18 withdrawn.
 19 Did you see Mr. Murphy leave
 20 Ms. Sanders' office?
 21 A Yes.
 22 Q And how long was the entire
 23 conversation from start to finish?
 24 A Oh, gosh. Like five to seven
 25 minutes.

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1 FAYE BROWN
 2 Q And other than hearing the
 3 words "fuck" and "bitch," did you hear
 4 any other part of the conversation?
 5 A No, it was like you --
 6 MR. HERNSTADT: Other than
 7 what she's already testified?
 8 MR. CESARATTO: Well, I
 9 think she's only testified that she
 10 heard "fuck" and "bitch."
 11 Q Is that right?
 12 A Yes. So far.
 13 MR. HERNSTADT: Let's go
 14 back because I think she also
 15 testified about what Ms. Sanders
 16 said.
 17 MR. CESARATTO: Oh, okay.
 18 That's right.
 19 Q Other than that, other than
 20 Mr. Murphy saying "fuck" and "bitch" and
 21 Ms. Sanders saying words to the effect,
 22 "don't yell at me, don't stand over me,"
 23 did you hear any other parts of the
 24 conversation?
 25 A "You."

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1 FAYE BROWN
 2 Q Who was saying "you"?
 3 A Mr. Murphy.
 4 Q Do you know the subject
 5 matter -- did you overhear the subject
 6 matter that they were discussing?
 7 A I didn't. Those words were --
 8 I think because they were used, like,
 9 loud and aggressively, that's why it kind
 10 of popped out to me. But in terms of the
 11 dialog, I am not too sure of the subject.
 12 Q Did Ms. Sanders raise her
 13 voice?
 14 A No. She kept it, "Frank, do
 15 not talk to me like that. Move away from
 16 my desk. Frank, do not stand over me."
 17 Like, she was just very professional.
 18 Q Did you speak with Ms. Browne
 19 Sanders after her conversation with
 20 Mr. Murphy ended?
 21 A No.
 22 Q You never asked her whether she
 23 was all right?
 24 MR. MINTZER: Objection to
 25 form.

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1 FAYE BROWN
 2 Q Did you on occasion observe
 3 Mr. Murphy to joke with Ms. Browne
 4 Sanders?
 5 MR. MINTZER: Objection to
 6 form.
 7 A On those occasions?
 8 Q On any occasion, did you
 9 observe Mr. Murphy to joke with
 10 Ms. Browne Sanders?
 11 A Yes.
 12 MR. MINTZER: Objection to
 13 form.
 14 Q And would you observe how she
 15 would respond to those jokes?
 16 A Well, Mr. Murphy always had,
 17 like, a joke to tell or a story. So you
 18 would just kind of just listen. But
 19 yeah, would listen.
 20 Q Would she laugh? On occasion,
 21 would she laugh?
 22 MR. MINTZER: Objection to
 23 form.
 24 Q On occasion, did she laugh?
 25 MR. MINTZER: Objection to

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1 FAYE BROWN
 2 form.
 3 A On occasion, yeah.
 4 Q Did Ms. Browne Sanders tell you
 5 that Mr. Thomas had used profanity when
 6 he spoke with her?
 7 A Did she tell me this?
 8 Q Yes.
 9 A Yes.
 10 Q And when was the first time
 11 that she told you that Mr. Thomas had
 12 used profanity with her?
 13 A I believe it was probably,
 14 like, the second meeting that they had
 15 together, the bi-monthly one.
 16 Q And where did Ms. Browne
 17 Sanders tell you this?
 18 A In the office.
 19 Q In her office?
 20 A Yes.
 21 Q And what did she say to you and
 22 what did you say to her in this
 23 conversation?
 24 A She just told me basically that
 25 he was -- he cursed at her and it just

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1 FAYE BROWN
 2 wasn't professional.
 3 Q And what did you say?
 4 A And she was shocked.
 5 Q And what did you say, if
 6 anything?
 7 A I was like, "Really? Man."
 8 Q And did she tell you the curse
 9 words that he used?
 10 A In that particular time or
 11 throughout?
 12 Q Asking you only about the first
 13 conversation.
 14 A The first conversation,
 15 F-U-C-K.
 16 Q Any other words that you would
 17 regard as curse words that she told you
 18 Isiah Thomas used in this conversation?
 19 A In that initial conversation?
 20 Q Yes.
 21 A No.
 22 Q Did she tell you anything else
 23 about the conversation that she and
 24 Mr. Thomas had where he used the word
 25 "fuck"?

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1 FAYE BROWN
 2 MR. HERNSTADT: Can you read
 3 that back, please.
 4 (Requested portion of record
 5 read: "Q. Did she tell you
 6 anything else about the
 7 conversation that she and
 8 Mr. Thomas had where he used the
 9 word "fuck"?")
 10 (End of read-back.)
 11 MR. HERNSTADT: Any
 12 conversation, or the one she's been
 13 testifying about?
 14 Q Just so we're clear, we are
 15 only on that initial conversation.
 16 So in that initial conversation
 17 where she said to you he used the word
 18 "fuck," did she tell you anything further
 19 about that conversation that she had with
 20 Mr. Thomas?
 21 A Yes. Yeah.
 22 Q What else did she say to you?
 23 A Basically what he told her.
 24 Q And what is it that she told
 25 you that he told her?

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1 **FAYE BROWN**
 2 A That he was, like, "who the F
 3 are you and what is your F'ing position
 4 here?"
 5 Q And did she say how she
 6 responded, if at all to Mr. Thomas?
 7 A Well, in terms of yeah, she
 8 told him that if -- basically, if he
 9 needs to find about what she does, like
 10 in detail, then she would probably
 11 have -- probably needs to go to Steve
 12 Mills to clarify.
 13 Q And this is all things that she
 14 told you in that initial conversation?
 15 A Yes.
 16 Q And did you understand --
 17 A Because she was taken back a
 18 little bit, so ...
 19 Q Did you come to have an
 20 understanding that basketball operations
 21 and business operations, that there was
 22 some question about their respective
 23 roles?
 24 MR. MINTZER: Objection to
 25 form.
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1 **FAYE BROWN**
 2 MR. HERNSTADT: Objection to
 3 form.
 4 A Their positions? Their job
 5 description?
 6 Q Strike that question.
 7 Did you come to an
 8 understanding that Mr. Thomas had a
 9 question about what Ms. Browne Sanders'
 10 role was at Madison Square Garden, in
 11 terms of what she did for her job?
 12 MR. MINTZER: Objection to
 13 form.
 14 MR. HERNSTADT: Objection to
 15 form.
 16 A Well, it seemed like he wasn't
 17 clear.
 18 Q He wasn't clear in terms of
 19 what her job duties were?
 20 A All of her job duties, right.
 21 Q And how did you come to have
 22 that understanding?
 23 A Because, yeah, that's what she
 24 communicated, you know. That she oversaw
 25 all of the business operations, and it
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1 **FAYE BROWN**
 2 was just like, like, he said to her
 3 like -- this is what she said to me. He
 4 said, "I'm the F'ing president, so I
 5 don't understand, you know, where do you
 6 come in," like, that kind of attitude.
 7 Q And when she told you that
 8 Isiah Thomas said, "I'm the F'ing
 9 president, I don't understand what you
 10 do," is this still in this initial
 11 conversation we were speaking about?
 12 A Yes.
 13 Q But did you ever speak with
 14 Ms. Browne Sanders about Mr. Thomas
 15 wanting to keep basketball operations
 16 separate from business operations?
 17 MR. MINTZER: Objection to
 18 form.
 19 MR. CESARATTO: Could you
 20 read it back.
 21 (Requested portion of record
 22 read: "Q. But did you ever speak
 23 with Ms. Browne Sanders about Mr.
 24 Thomas wanting to keep basketball
 25 operations separate from business
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1 **FAYE BROWN**
 2 operations?")
 3 (End of read-back.)
 4 A No, I didn't talk to her about
 5 that.
 6 Q Have you told us everything
 7 that Ms. Browne Sanders said to you in
 8 this initial conversation?
 9 A I think there was more, but I
 10 don't remember at this time.
 11 Q Did Ms. Browne Sanders --
 12 strike that question.
 13 Did there come another time
 14 where Ms. Browne Sanders told you that
 15 Mr. Thomas had used profanity with her?
 16 A Yes.
 17 Q And when was the next time that
 18 she told you this?
 19 A I believe it was the following
 20 meeting.
 21 Q And where did she tell you
 22 this?
 23 A In her office.
 24 Q And what did she say to you and
 25 what did you say to her during this
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1 FAYE BROWN
 2 conversation?
 3 A What did she say to me? I
 4 think it got worse because she said
 5 something like he said -- something about
 6 "F'ing B-I-T-C-H," because she said she
 7 was going to go to Steve because it seems
 8 like he's not working with her, like, in
 9 terms of, I guess, being -- in terms of
 10 methods of management or something. I
 11 don't know. Like, he wasn't being very
 12 cooperative. And that's it. Yeah.
 13 Q And what did you say to her, if
 14 anything, in this second conversation?
 15 A Well, I was still, like,
 16 shocked, like, "What? Nah. You serious?
 17 No. That's unacceptable. No, you have
 18 to say something to your supervisor,
 19 Steve, someone, because it's just not a
 20 part of Madison Square Garden policy."
 21 Q What, if anything, did
 22 Ms. Browne Sanders say after you said
 23 that she should tell Steve or her
 24 supervisor that it's not part of Madison
 25 Square Garden policy?

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1 FAYE BROWN
 2 and her in this conversation?
 3 A At the time, it was just me and
 4 her.
 5 Q Did anybody else come into the
 6 conversation?
 7 A In that conversation?
 8 Q This is we're talking about the
 9 second conversation.
 10 A Okay. No, no.
 11 Q Did you tell anybody at any
 12 point about this second conversation you
 13 had with Ms. Browne Sanders?
 14 A Telling anyone what?
 15 Q Tell anyone at work.
 16 A No.
 17 Q Did you tell Michelle Quendo?
 18 A Michelle Quendo?
 19 Q Yes.
 20 A No.
 21 Q Did you tell Raquel Burnette?
 22 A No.
 23 Q Did you tell any of your
 24 friends at work about this?
 25 A No.

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1 FAYE BROWN
 2 MR. MINTZER: Objection to
 3 form.
 4 A Say that again.
 5 Q After you said that, what did
 6 Ms. Browne Sanders say, if anything?
 7 A She was just shocked the fact
 8 that he was, you know, Isiah Thomas and
 9 she was just shocked in the kind of
 10 behavior, threw her off a little bit.
 11 And say, okay, this is what I'm dealing
 12 with, this is what's going on, and how is
 13 the best way to deal with this.
 14 Q And these are all things she's
 15 saying to you in this conversation?
 16 A Yeah, like, how do I -- you
 17 know. I understand there's a policy, but
 18 you know, you want to give people the
 19 benefit of the doubt. But you know, it
 20 was out of hand. And actually, she was
 21 crying at that point.
 22 Q She was crying when she spoke
 23 to you?
 24 A Yeah.
 25 Q Was anyone else other than you

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1 FAYE BROWN
 2 Q What about the first
 3 conversation, did you tell any of your
 4 friends at work about that conversation
 5 with Ms. Browne Sanders?
 6 A No, not that I can remember.
 7 Q So it's your testimony that you
 8 kept these two conversations just between
 9 yourself and Ms. Browne Sanders?
 10 A It was confidential, yeah.
 11 Yes.
 12 I think she was a little
 13 shocked because it was disrespectful. I
 14 think that's why she was crying because
 15 it was disrespectful.
 16 Q Did there come any point in
 17 time after the second conversation where
 18 you and she again discussed Mr. Thomas
 19 using profanity with her?
 20 A In the second conversation?
 21 Q After the second conversation.
 22 A Yes.
 23 Q And when was the next time the
 24 two of you discussed Mr. Thomas'
 25 profanity?

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1 **FAYE BROWN**
 2 A I am not sure. I think
 3 probably, like, the following month or
 4 something.
 5 Q And where did that conversation
 6 take place?
 7 A In her office.
 8 Q And what did she say to you
 9 during that conversation?
 10 A That he was using profanity,
 11 using the F word.
 12 Q Did Ms. Browne Sanders say he
 13 used any profanity other than the word
 14 "fuck"?
 15 A In this other meeting? No.
 16 Q We are talking about the third
 17 conversation the two of you had now?
 18 A Right. No.
 19 Q What did she tell you, if
 20 anything, other than the fact -- other
 21 than the Mr. Thomas using the word
 22 "fuck"?
 23 A Nothing. She just said that
 24 she's being professional about the
 25 situation. She understands that, you
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1 **FAYE BROWN**
 2 know, in terms of relationship building
 3 was very important, you know, to her. So
 4 she was just trying to work with it, but
 5 it just got out of hand.
 6 Q So is that words that she used,
 7 "get out of hand"?
 8 A No. I'm using it.
 9 Q I'm asking you what you
 10 remember her saying to you.
 11 A Okay.
 12 Q So what do you remember her
 13 saying to you in this third conversation?
 14 A That she's trying to work.
 15 She's trying to put it aside and be
 16 professional and get their job done, you
 17 know.
 18 Q Was anyone else other than the
 19 two of you present in this third
 20 conversation?
 21 A I think Karen Buchholz was in a
 22 meeting with us. I don't know if it's
 23 this one. But I know she was in with us
 24 at some point.
 25 Q So you believe that Karen
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1 **FAYE BROWN**
 2 Buchholz was present during a
 3 conversation with Ms. Browne Sanders
 4 where Mr. Thomas -- where Ms. Browne
 5 Sanders said Mr. Thomas had used
 6 profanity?
 7 A Yes.
 8 Q But you are not sure it was
 9 this third conversation or not?
 10 A Right, right.
 11 Q And what, if anything, did you
 12 say to her after she told you this in
 13 this third conversation?
 14 A I was just, like, "no way,"
 15 like, you know, "wow," you know. I don't
 16 know, I guess my whole thing was, you
 17 know, you give someone the benefit of the
 18 doubt, but if it's something that -- and
 19 she basically said, "I've told him do not
 20 talk to me like that, it's just not
 21 appropriate." So she told him, and he
 22 just continued. So what do you do. That
 23 was my question. What do you do when
 24 someone is not really listening.
 25 Q And did you suggest she do
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1 **FAYE BROWN**
 2 anything?
 3 A I said, "What do you think?"
 4 And I kind of gave the question back to
 5 her, "What do you think you should do?"
 6 Q And what did she say?
 7 A She went to Steve Mills.
 8 Q So at some point she told you
 9 she went to Steve Mills?
 10 A Yes.
 11 MR. MINTZER: Objection to
 12 form.
 13 Q And what did she tell you about
 14 going to Steve Mills?
 15 A She went to Steve Mills and
 16 explained to him what happened.
 17 Q I'm asking you now, I'm asking
 18 you what she told you.
 19 So to the best of your memory,
 20 what do you remember she telling you
 21 about her going to Steve Mills about
 22 Isiah Thomas?
 23 A She told me everything that I
 24 told you.
 25 Q And what was that?
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1 FAYE BROWN
 2 What it that she told you?
 3 A About him cursing at her,
 4 F-U-C-K, the B-I-T-C-H, you know, "what
 5 is this, I'm the president, what's going
 6 on?" And basically she approached him
 7 with that and said, you know, probably in
 8 terms of clarifying what each job
 9 description is, because it seems like in
 10 terms of if we're going to work together,
 11 you know, it has to be things that are
 12 communicated and made clear so that there
 13 can be some kind of unit.
 14 Q Did she tell you that she told
 15 Mr. Mills that Isiah Thomas used the word
 16 "fuck"?
 17 Did she tell you that?
 18 A Yes, yes.
 19 Q Did she tell you that she told
 20 Mr. Mills that Isiah Thomas used the word
 21 "bitch"?
 22 MR. MINTZER: Asked and
 23 answered.
 24 You can answer it again.
 25 A Sorry.

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1 FAYE BROWN
 2 Q Did she tell you, did
 3 Ms. Browne Sanders tell you that she told
 4 Steve Mills that Isiah Thomas had called
 5 her a "bitch"?
 6 A Yes. And profanity. She used
 7 that word too, "profanity."
 8 Q Did she tell you what, if
 9 anything, Steve Mills said after she told
 10 him this?
 11 MR. HERNSTADT: What Steve
 12 Mills said to --
 13 Q What Steve Mills said to
 14 Ms. Browne Sanders.
 15 A Well, he listened to what she
 16 said. And then, I think, a couple days
 17 later, he started the -- the meeting that
 18 Anucha had with Isiah, Steve kind of
 19 oversaw that. So now it was just, like,
 20 okay, let's meet altogether, Steve, Isiah
 21 Thomas and Anucha, and let's try to talk.
 22 Q Did Ms. Browne Sanders tell you
 23 about that meeting with Mr. Thomas,
 24 Mr. Mills and herself?
 25 A Yes, she did.

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1 FAYE BROWN
 2 Q And when did she tell you that?
 3 When did she tell you about that meeting?
 4 A The same day.
 5 Q Same day of the meeting?
 6 A Yes.
 7 Q And when was that?
 8 A I am not sure. I am not sure
 9 about the time. Let me think.
 10 I'm wondering if it's, like, in
 11 the summertime. I am not sure.
 12 MR. HERNSTADT: Again, he is
 13 not asking you to speculate.
 14 THE WITNESS: Okay. All
 15 right.
 16 Q And what did Ms. Browne Sanders
 17 tell you was said in that meeting?
 18 A Basically that Steve kind of
 19 explained what her role was and explained
 20 what his role was, and kind of just
 21 saying, you know, we want to come to,
 22 like, a common place, common ground. And
 23 then she told me he had to take a call,
 24 so he left where they were meeting. And
 25 that's when he started, like, cursing at

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1 FAYE BROWN
 2 her again.
 3 Q Did she say what words he used?
 4 A F word.
 5 MR. HERNSTADT: Can we be
 6 clear who the "he" is here?
 7 THE WITNESS: Isiah.
 8 Q It's Isiah Thomas you are
 9 saying she told you that Isiah Thomas
 10 started cursing at her?
 11 A Right.
 12 Q Not Steve Mills?
 13 A Right.
 14 Q And what words did she say
 15 Isiah Thomas used?
 16 A The F word.
 17 Q The word "fuck"?
 18 A Yes.
 19 Q Did she tell you anything else
 20 about this meeting?
 21 A Yes. She said that, I think
 22 when Steve came back, she said that she
 23 stated that, you know, she's played on
 24 the courtyard, like. Like, she's played
 25 street ball. So she's not the type of

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1 FAYE BROWN
 2 person to just cry if something goes
 3 wrong, but she will not tolerate this
 4 disrespect and this basic -- like a
 5 playground. Because she said when Steve
 6 left, it was all of a sudden he just
 7 started again. So it was, like, what was
 8 going on. Inappropriate.
 9 Q Did she tell you what, if
 10 anything, Steve Mills said after she
 11 said, you know, she's not going to
 12 tolerate this disrespect, she's played
 13 street ball?
 14 A Right. And from that ball --
 15 What did you say?
 16 Q What did Mr. Mills say, if
 17 anything, after that, according to
 18 Ms. Sanders?
 19 A Basically he just kept the
 20 meeting, like, him, Isiah and Anucha. It
 21 wasn't no longer Isiah and Anucha
 22 anymore. It was he was going to be there
 23 to moderate and he was going to be, like,
 24 the common ground that they could both
 25 meet and talk and try to work it out or
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1 FAYE BROWN
 2 something, work out some kind of ...
 3 Q And Ms. Browne Sanders told you
 4 all of this?
 5 A Yes.
 6 Q You weren't at that meeting,
 7 correct?
 8 A No.
 9 Q I believe you've told me about,
 10 I guess, four or five different
 11 conversations where Ms. Browne Sanders
 12 has told you that Mr. Thomas used
 13 profanity with her?
 14 A Yes.
 15 Q Are there any other
 16 conversations that you've had with
 17 Ms. Browne Sanders where she's told you
 18 that Mr. Thomas used profanity?
 19 A I think it was probably once or
 20 twice after that, and that's when --
 21 okay. Yeah.
 22 Q There were one or two more
 23 conversations after that.
 24 What did Ms. Browne Sanders say
 25 in those conversations?
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1 FAYE BROWN
 2 Let's start with the first one
 3 you remember.
 4 A I don't remember. I don't
 5 remember that off the top of my head.
 6 Q You don't remember what she
 7 said?
 8 A Oh, yes, I remember she saying
 9 she was telling him -- no, this is after
 10 the Steve meeting, after the Steve
 11 meeting. They really didn't have
 12 meetings alone together after that.
 13 Q So after you and she spoke
 14 about the Steve meeting, were there any
 15 other conversations that you had with
 16 Ms. Browne Sanders where she told you
 17 that Mr. Thomas had used profanity with
 18 her?
 19 MR. MINTZER: Asked and
 20 answered.
 21 The question had been asked
 22 and answered, but you could answer
 23 it again.
 24 A I don't remember right now.
 25 Q Did Ms. Browne Sanders ever
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1 FAYE BROWN
 2 tell you that she was documenting
 3 Mr. Thomas' use of profanity with her?
 4 MR. HERNSTADT: Objection to
 5 form.
 6 MR. MINTZER: Objection to
 7 form.
 8 A Well, she has a book that she
 9 puts all her information on. So in terms
 10 of documenting, I am not sure what you
 11 mean.
 12 MR. HERNSTADT: Could you
 13 read back the question, please.
 14 (Requested portion of record
 15 read: "Q. Did Ms. Browne Sanders
 16 ever tell you that she was
 17 documenting Mr. Thomas' use of
 18 profanity with her?")
 19 (End of read-back.)
 20 A Yes.
 21 Q And what did she tell you
 22 about -- strike that question.
 23 Did she tell you where she was
 24 documenting his use of profanity?
 25 MR. HERNSTADT: Objection to
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1 FAYE BROWN
 2 write into her journal?
 3 MR. HERNSTADT: Objection to
 4 form.
 5 MR. MINTZER: Objection to
 6 form.
 7 A Schedules, telephone numbers.
 8 Her thoughts. What she thought about a
 9 situation. Her conversations with
 10 people. What stood out to her in that
 11 day. Good pointers, tips that she needs
 12 to remember.
 13 Q And did she ever tell you why
 14 she wrote these things in her journal?
 15 A Well, it's important. It
 16 was -- it's ever since I knew her and
 17 worked for her, she wrote everything down
 18 in her journal. Because she wants to
 19 make sure she doesn't forget anything.
 20 That she's organized.
 21 Q Did you ever see any e-mails
 22 where Mr. Thomas' use of profanity was
 23 mentioned?
 24 A No, I didn't see any e-mails --
 25 no, I don't recall. I don't remember

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1 FAYE BROWN
 2 right now.
 3 Q Did Ms. Sanders ever tell you
 4 that Mr. Thomas had used the word "love"
 5 in speaking with her?
 6 A Yes.
 7 Q When was the first time she
 8 told you that?
 9 A In January.
 10 Q January of what year?
 11 A 2005.
 12 Q Why do you remember it was in
 13 January 2005?
 14 A Because it was closer to the
 15 Christmas party.
 16 Q You are talking about Christmas
 17 party where you observed Ms. Sanders and
 18 Mr. Thomas play Horse?
 19 A Right.
 20 Q And where did she tell you --
 21 where did you have this conversation with
 22 Ms. Browne Sanders where she said
 23 Mr. Thomas had used the word "love"?
 24 A I think in her office.
 25 Q In her office?

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1 FAYE BROWN
 2 A Yes.
 3 Q And what did she say to you in
 4 this conversation?
 5 A She said that he said to her
 6 that, "Oh, now I know why there's tension
 7 between us" and "it's like love and
 8 basketball," you know, "I'm in love with
 9 you. That's what it is."
 10 Q Did she say anything else?
 11 A She was, like, "First he's
 12 cursing and now he's in love." Like
 13 "What's going on?" Like that. She was
 14 like, "This is just inappropriate,
 15 period."
 16 Q Was she laughing it off with
 17 you?
 18 A What?
 19 Q Was she laughing it off?
 20 MR. MINTZER: Objection to
 21 form.
 22 A Laughing it off?
 23 Q Yeah.
 24 A No.
 25 Q Was she laughing about it?

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1 FAYE BROWN
 2 A No. I'm laughing.
 3 Q Was she laughing about it at
 4 the time she told you?
 5 A No.
 6 Q What, if anything, did you say
 7 to her?
 8 A And then I told her about the
 9 situation in December. That's when I
 10 told her because it was like a
 11 confirmation that, whoa, okay, it's
 12 probably true, because it was true.
 13 Q And what did you tell her you
 14 saw?
 15 A I told her I saw him flirting
 16 or just looking at her up and down, like,
 17 "I want you," you know, kind of flirting.
 18 You know when somebody is flirting at
 19 you, looking at her body.
 20 Q And what did she say?
 21 A And she was just like "What?
 22 See? What is going on? This is
 23 outrageous."
 24 Q Did she tell you what her
 25 response to Mr. Thomas was when he said

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1 **FAYE BROWN**
 2 "I'm in love with you. This is like love
 3 and basketball"? '
 4 MR. MINTZER: Objection to
 5 form.
 6 You can answer.
 7 A She just said, "You need to
 8 stop doing this. You need to just" --
 9 she brought it back to a professional
 10 level.
 11 Q Did she tell you that she told
 12 Steve Mills about it?
 13 A Yes.
 14 Q When did she tell you that she
 15 told Steve Mills?
 16 A This was after my meeting, my
 17 conversation in January.
 18 Q So you had this conversation in
 19 January where she tells you about this
 20 comment about love and basketball?
 21 A Right.
 22 Q And then you have a subsequent
 23 conversation with Ms. Browne Sanders
 24 where she says she told Steve Mills about
 25 Mr. Thomas?
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1 **FAYE BROWN**
 2 MR. HERNSTADT: Objection to
 3 form.
 4 A Yeah. In terms of policy and
 5 procedure, it's something that she has to
 6 do. She has to tell her supervisor about
 7 the situation, even though, you know, he
 8 has a lot on his plate, there's lot going
 9 on in the Garden, people are trying to do
 10 their jobs. But this is something that
 11 has to be addressed because, you know, if
 12 it's not, that's not the Garden policy.
 13 Q But my question is: Did she
 14 tell you that she actually spoke to Steve
 15 Mills about the love and basketball
 16 conversation?
 17 A Yes.
 18 MR. MINTZER: Asked and
 19 answered.
 20 A She did.
 21 Q And what did she say about
 22 that?
 23 MR. HERNSTADT: Objection.
 24 Go ahead.
 25 Q What did she say about her
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1 **FAYE BROWN**
 2 conversation with Mr. Mills?
 3 A She just explained to him what
 4 happened.
 5 Q And what did she tell you she
 6 explained to Mr. Mills?
 7 A What I told you about, about
 8 the love and basketball and that he said
 9 "he's in love with me" and that's why he
 10 understands the root why there's tension
 11 between them.
 12 Q So Ms. Browne Sanders told you
 13 that she told Mr. Mills what exactly what
 14 Mr. Thomas said to her?
 15 A Right. And I believe she sent
 16 an e-mail to him.
 17 Q And why do you believe that?
 18 A Because she did.
 19 Q And when you say "e-mail to
 20 him," you mean e-mail to whom?
 21 A To Steve Mills.
 22 Q Did you see this e-mail?
 23 A Yes.
 24 Q When did you see it?
 25 A Before she sent it.
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1 **FAYE BROWN**
 2 Q How did you come to see it?
 3 A Well, she just asked me in
 4 terms of, you know, she didn't want to
 5 seem -- she didn't want to add any
 6 pressure to him because she respected
 7 Steve a lot. So she didn't want to add,
 8 like, "Oh, gosh what do you want now,"
 9 like that kind of attitude. She wanted
 10 to present it to him where she didn't
 11 want to be overbearing. She wanted to do
 12 it in the best professional way. So she
 13 just asked me to document and read, does
 14 this sound like -- how does this sound.
 15 Q And where did you read it?
 16 A I read it in her office.
 17 Q On her computer monitor?
 18 A Yes.
 19 Q Was she present while you read
 20 it?
 21 A Yes.
 22 Q And what did it say?
 23 A Oh, I don't remember all of it
 24 now, but just basically, "Steve, I would
 25 like to have a meeting with you
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