

MANATT, PHELPS & PHILLIPS, LLP
L. Peter Parcher (LP 8096)
Lisa Horwitz (LH 8168)
7 Times Square
New York, New York 10036
Telephone: (212) 790-4500
Facsimile: (212) 790-4545

And

EISENBERG & BOGAS, P.C.
Sue Ellen Eisenberg
33 Bloomfield Hills Parkway, Suite 145
Bloomfield Hills, MI 48304
Attorneys for Defendant Isiah Thomas

FILED
2006 FEB 21 PM 2:13
S.D. OF N.Y.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Anucha Browne Sanders,

Plaintiff,

v.

Madison Square Garden, L.P., and Isiah Lord
Thomas III,

Sanders v. Madison Square Garden, L.P. et al

Defendant.

06 CV 0589 (GEL)(DCF)

**NOTICE OF MOTION FOR PRO
HAC VICE ADMISSION OF
SUE ELLEN EISENBERG**

Doc. 6

PLEASE TAKE NOTICE that upon the annexed declaration of Lisa Horwitz and the Certificate of Good Standing annexed thereto, Defendant Isiah Thomas will move the Court before the Honorable Gerard E. Lynch at the United States Courthouse for the Southern District of New York, pursuant to Civil Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order granting *pro hac vice* admission of Sue Ellen Eisenberg, a partner of the law firm of Eisenberg & Bogas, P.C., and a member in good standing of the Bar of the State of Michigan.

Dated: New York, New York
February 17, 2006

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

By: 

L. Peter Parcher (LPP 8096)

Lisa Horwitz (LH 8168)

7 Times Square

New York, New York 10036

Telephone (212) 790-4500

Fax (212) 790-4545

lhowitz@manatt.com

pparcher@manatt.com

Attorneys for Defendant Isiah Thomas

MANATT, PHELPS & PHILLIPS, LLP
L. Peter Parcher (LPP 8096)
Lisa Horwitz (LH 8168)
7 Times Square
New York, New York 10036
Telephone: (212) 790-4500
Facsimile: (212) 790-4545

And

EISENBERG & BOGAS, P.C.
Sue Ellen Eisenberg
33 Bloomfield Hills Parkway, Suite 145
Bloomfield Hills, MI 48304

Attorneys for Defendant Isiah Thomas

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Anucha Browne Sanders,	}	06 CV 0589 (GEL)(DCF)
Plaintiff,	}	
v.	}	
Madison Square Garden, L.P., & Isiah Lord Thomas III	}	
Defendant.	}	DECLARATION OF LISA HORWITZ IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION OF SUE ELLEN EISENBERG

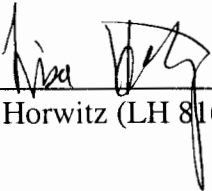
I, LISA HORWITZ, hereby declare under penalty of perjury:

1. I am a member of the bar of the State of New York and of the Southern District of New York and am an attorney at Manatt, Phelps & Phillips, LLP, counsel for Defendant Isiah Thomas in the above-captioned matter. I submit this declaration in support of the application of Sue Ellen Eisenberg for admission to the bar of this Court *pro hac vice*.

2. Ms. Eisenberg is the founding partner of the law firm Eisenberg & Bogas, P.C., residing in Bloomfield Hills, Michigan. She has practiced law for more than thirty years and is a highly regarded expert in fair employment practice law. In the past, Ms. Eisenberg served as Special Assistant to the General Counsel of the Equal Employment Opportunity Commission and was instrumental in drafting the Federal Guidelines on Sexual Harassment. Ms. Eisenberg is a member in good standing of the bar of the State of Michigan. Annexed hereto as Exhibit A is a certificate from

the State Bar of Michigan stating that Ms. Eisenberg is a member of good standing of that bar. Ms. Eisenberg's expertise in fair employment practices law makes her an invaluable member of the defense team.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on February 17, 2006.



Lisa Horwitz (LH 8168)

80356179.1

State Bar of Michigan

Certificate of Good Standing



This certifies that Sue Ellen Eisenberg, P25530 of Bloomfield Hills, Michigan is an active member of the State Bar of Michigan in good standing. She was admitted to practice in Michigan on October 27, 1975 in Wayne County and became a member of the State Bar of Michigan on October 27, 1975.

John T. Berry

John T. Berry
Executive Director
February 07, 2006



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Anucha Browne Sanders,	X	
)	06 CV 0589 (GEL)(DCF)
Plaintiff,)	AFFIDAVIT OF MAIL SERVICE
- against -)	
)	
Madison Square Garden, L.P., and Isiah Lord Thomas III,)	
)	
Defendant.)	
)X	

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

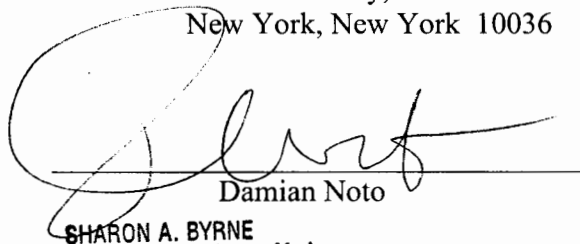
Damian Noto, being duly sworn, deposes and says:

1. I am over 18 years of age and not a party to this action. I am employed by Manatt, Phelps & Phillips, LLP attorneys for Defendant Isiah Lord Thomas III.

2. On the 21st day of February, 2006, I served a true and complete copy of the Notice of Motion and Declaration of Lisa Horwitz in Support of Motion for Pro Hac Vice Admission by depositing said copy in a post office box regularly maintained by the United States Postal Service, in a securely-sealed, postage-paid envelope, addressed to plaintiff's counsel as listed below:

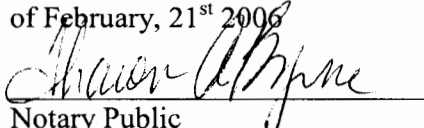
Ronald M. Green, Esq. (RG 7766)
Donna Marie Werner (DW 9204)
Epstein Becker & Green, PC
Attorneys for Defendant Madison Square Garden, L.P.,
250 Park Avenue
New York, NY 10177-1211

Anne C. Vladeck, Esq. (AV 4857)
Kevin T. Mintzer (KM 4741)
Vladeck, Waldman, Elias & Engelhard, P.C.
Attorneys for Plaintiff Anucha Browne Sanders
1501 Broadway, Suite 800
New York, New York 10036



Damian Noto

Sworn to before me this Day
of February, 21st 2006



Notary Public
80356229.1

SHARON A. BYRNE
Notary Public, State of New York
No. 01BY6028787
Qualified in Richmond County
Term Expires August 2, 2024