

Sue Ellen Eisenberg (SE-4713) – *admitted pro hac vice*
Lucetta Franco (LF-7638) - *admitted pro hac vice*
Eisenberg & Bogas, P.C.
33 Bloomfield Hills Parkway, Suite 145
Bloomfield Hills, Michigan 48304-2945
(248) 258-6080

- and -

Laurie Berke-Weiss (LB-3445)
Louis Pechman (LP-6395)
Berke-Weiss & Pechman, LLP
488 Madison Avenue
New York, New York 10022
(212) 583-9500

Attorneys for Defendant Isiah Lord Thomas III

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

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

Defendants.

Civil Case No. 06 Civ. 0589 (GEL) (DCF)

ECF CASE

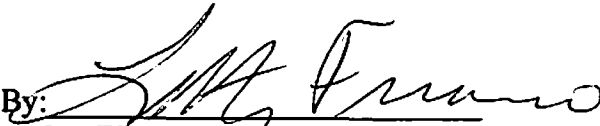
NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Lucetta V. Franco executed on May 4, 2007 and the exhibits annexed thereto, and the Declaration of Isiah Thomas executed on May 2, 2007, and Defendant Isiah Thomas' Statement of Undisputed Material Facts pursuant to Local Rule 56.1, the undersigned will move this Court before the Honorable Gerard E. Lynch at the United State Courthouse, 500 Pearl

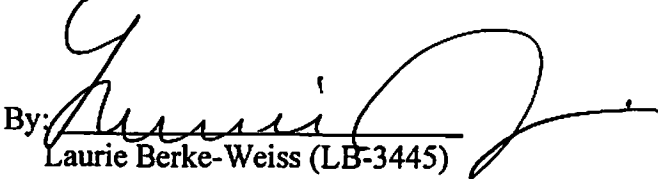
Street, New York, New York 10007-1312, on a date to be determined by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting summary judgment and dismissing claims 3 and 4 in the Second Amended Complaint of plaintiff Anucha Browne Sanders, as against defendant Isiah Lord Thomas III.

Dated: New York, NY
May 4, 2007

EISENBERG & BOGAS, P.C.

By: 
Sue Ellen Eisenberg (SE-4713) – *admitted pro hac vice*
Lucetta Franco (LF-7638) - *admitted pro hac vice*
Eisenberg & Bogas, P.C.
33 Bloomfield Hills Parkway, Suite 145
Bloomfield Hills, Michigan 48304-2945
(248) 258-6080

BERKE-WEISS & PECHMAN LLP

By: 
Laurie Berke-Weiss (LB-3445)
Louis Pechman (LP-6395)
Berke-Weiss & Pechman LLP
488 Madison Avenue, 11th Floor
New York, NY 10022
(212) 583-9500

Attorneys for Defendant Isiah Thomas

TO: Anne C. Vladeck (AV-4857)
Kevin T. Mintzer (KM-4741)
Karen Cacace (KC-3184)
Vladeck, Waldman,
Elias & Engelhard, P.C.
Attorneys for Plaintiff
1501 Broadway, Suite 800

New York, NY 10036
(212) 403-7300

Ronald M. Green (RG-7766)
Theresa M. Holland (TH- 6973)
Brian G. Cesaratto (BC- 5464)
Epstein Becker & Green, P.C.
Attorneys for Defendants Madison Square
Garden, L.P. and James L. Dolan
250 Park Avenue
New York, NY 10177
(212) 351-4500

Amber L. Kagan (AK-7973)
Morgan, Lewis & Bockius LLP
Attorneys for Defendants Madison Square
Garden, L.P. and James L. Dolan
101 Park Avenue
New York, NY 10178
(212) 309-6000