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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANUCHA BROWNE SANDERS,	:	
	:	
Plaintiff,	:	06 CV 0589 (GEL) (DCF)
	:	
- against -	:	ECF CASE
	:	
MADISON SQUARE GARDEN, L.P., ISIAH LORD	:	NOTICE OF MOTION
THOMAS III AND JAMES L. DOLAN,	:	FOR PARTIAL
	:	<u>SUMMARY JUDGMENT</u>
Defendants.	:	
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PLEASE TAKE NOTICE that upon the attached Rule 56.1 Statement, the Declaration of Brian G. Cesaratto, the Affidavits of James Dolan, Stephen Mills and John Moran, and all exhibits and deposition transcript pages attached thereto, the Memorandum of Law, and upon all prior pleadings and proceedings in this action, Defendants, Madison Square Garden, L.P. and James L. Dolan (“Defendants”), by their attorneys Epstein Becker & Green, P.C. and Morgan, Lewis & Bockius LLP, move this Court before the Honorable Gerard E. Lynch, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order

granting partial summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure in favor of Defendants (i) dismissing Plaintiff's claims for front pay and reinstatement as well as limiting Plaintiff's claims for back pay from the date of termination to the date of discovery of the after acquired evidence; (ii) dismissing Plaintiff's claim for "reputational injury"; and (iii) further awarding to Defendants such other relief as this Court deems just and proper.

Dated: New York, New York
April 27, 2007

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By: s/Ronald M. Green

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