

# Exhibit 8

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
ANUCHA BROWNE SANDERS,

Plaintiff,

06 Civ. 0589 (GEL) (DF)

- 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.

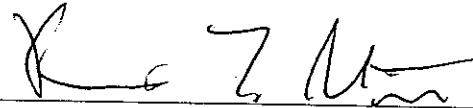
27. Pursuant to the parties' understanding of December 22, 2005, on December 27, 2005, Browne Sanders' counsel conveyed a settlement proposal to MSG's counsel in connection with Browne Sanders' sexual harassment claims against MSG. To the best of my knowledge, prior to this proposal, neither Browne Sanders 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.

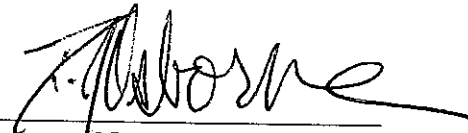
30. On January 19, 2006, MSG's counsel informed me that MSG's investigation of plaintiff's internal complaint had been concluded. In that same conversation,

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 9



**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](http://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

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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 10

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.

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

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

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1 ANUCHA BROWNE SANDERS  
 2 A And I liked him.  
 3 Q And would you believe that it  
 4 was reciprocated?  
 5 A Yes.  
 6 Q So there was a good feeling  
 7 there between you and the general manager  
 8 of the Garden for several years, correct?  
 9 A Yes.  
 10 Q In addition to that, there was  
 11 an assistant general manager by the name  
 12 of Jeff Nix, was there not?  
 13 A Yes.  
 14 Q And Jeff also was a buddy of  
 15 yours, at the workplace? At the  
 16 workplace.  
 17 A Jeff Nix was and is a friend  
 18 of mine.  
 19 Q And continues to be a good  
 20 friend, correct?  
 21 A Yes.  
 22 Q Now, as the vice president of  
 23 marketing, is it your position that you  
 24 had a direct reporting relationship to  
 25 Scott Layden?

35

1 ANUCHA BROWNE SANDERS  
 2 MS. VLADECK: Objection to  
 3 form.  
 4 A No.  
 5 Q Is it your position that you  
 6 had a dotted line relationship to  
 7 Scott Layden?  
 8 A Yes.  
 9 Q Now, I understand that, as a  
 10 practical matter, you may have interfaced  
 11 with him quite regularly on work-related  
 12 matters.  
 13 But as a part of your  
 14 responsibility as the vice president of  
 15 marketing, would you describe what the  
 16 dotted line relationship was?  
 17 A Yes. The dotted line  
 18 relationship was really about making sure  
 19 that he was kept abreast of what was going  
 20 on in the business side of the team. And  
 21 that encompassed just regular meetings  
 22 with him.  
 23 Q When you say "the business  
 24 side of the team," at the time that Layden  
 25 was there initially, your responsibilities

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1 ANUCHA BROWNE SANDERS  
 2 were for the marketing side, correct?  
 3 A Yes.  
 4 Q And is that what you mean by  
 5 the business side, or is there something  
 6 more that you mean?  
 7 A A large part of the marketing  
 8 side really was the business side. So  
 9 that it really was marketing, primarily  
 10 marketing, and I would say community  
 11 relations as well. Part of the  
 12 communications function.  
 13 Q Was there an organizational  
 14 chart at the Garden at that time that  
 15 would describe the relationships of the  
 16 various executives each to each other in a  
 17 business sense?  
 18 A The ones that I reviewed were  
 19 only focused on my direct reports.  
 20 Q And didn't contain any dotted  
 21 lines at all concerning anybody?  
 22 MS. VLADECK: Objection to  
 23 form.  
 24 A I can't recall.  
 25 Q So you are not saying that it

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1 ANUCHA BROWNE SANDERS  
 2 did or it didn't; you are saying you just  
 3 don't remember?  
 4 A I don't recall seeing any that  
 5 had my level and my peers up.  
 6 Q Eventually Isiah Thomas came  
 7 to become general manager of the New York  
 8 Knicks; is that right?  
 9 A Yes.  
 10 Q And that was in December of  
 11 '03, if I'm not mistaken?  
 12 A Yes, it was.  
 13 Q And did you consider that you  
 14 had had any input into the firing of  
 15 Scott Layden?  
 16 MS. VLADECK: Objection to  
 17 form.  
 18 A No.  
 19 Q Did you consider yourself as  
 20 having any input into the hiring of  
 21 Isiah Thomas?  
 22 A No.  
 23 Q Did you tell anybody --  
 24 employee of Madison Square Garden that  
 25 "we" had fired Scott Layden?

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1 ANUCHA BROWNE SANDERS  
 2 A I'm sorry. I don't understand  
 3 your question.  
 4 MR. PARCHER: Can you repeat  
 5 the question.  
 6 (Requested portion of record  
 7 read: "Q. Did you tell employee of  
 8 Madison Square Garden that "we" had  
 9 fired Scott Layden?")  
 10 A Who is "we"?  
 11 Q I'm asking whether you ever  
 12 said it.  
 13 MS. VLADECK: Objection to the  
 14 form.  
 15 A That "we fired Scott Layden,"  
 16 those words?  
 17 Q In substance, yes, but the  
 18 word "we" is in it.  
 19 A I don't understand your  
 20 question. But no, I don't recall ever  
 21 saying that to anybody.  
 22 Q So you understand the  
 23 question, but your answer is no, right?  
 24 MS. VLADECK: Objection to  
 25 form.

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1 ANUCHA BROWNE SANDERS  
 2 A I don't understand the  
 3 question as in "we."  
 4 Am I representing the company  
 5 in saying "we"?  
 6 Q I don't know. I'm asking you  
 7 whether you ever said words to that  
 8 effect.  
 9 Do you understand that? Do  
 10 you understand my question?  
 11 A I don't recall ever saying  
 12 that.  
 13 Q But do you understand my  
 14 question?  
 15 A Sure.  
 16 Q And your answer is you don't  
 17 recall saying that?  
 18 A No.  
 19 Q How about that "We hired Isiah  
 20 Thomas"?  
 21 A I don't remember if I ever  
 22 said that.  
 23 Q So you may have said that?  
 24 A I don't remember.  
 25 Q Well, that indicates to me --

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1 ANUCHA BROWNE SANDERS  
 2 correct me if I'm wrong -- that you are  
 3 not precluding the possibility that you  
 4 did.  
 5 A "We hired Isiah Thomas"? I  
 6 may have said that.  
 7 Q Did you consider yourself as  
 8 having a direct relationship -- I am  
 9 talking about in the organizational  
 10 sense -- did you consider yourself as  
 11 having a direct relationship with  
 12 Mr. Thomas as part of your job?  
 13 A The same dotted line  
 14 relationship that I had with Scott Layden,  
 15 yes.  
 16 Q Are you familiar with any --  
 17 I'm calling it charts. I don't know if  
 18 that's the right description, but I will  
 19 show it to you in a minute.  
 20 Are you familiar with any  
 21 charts that were made at the Garden that  
 22 indicated what relationship, if any, you  
 23 had with Mr. Thomas?  
 24 A No, I don't.  
 25 Q Perhaps I'll show you a few

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1 ANUCHA BROWNE SANDERS  
 2 and see if they refresh your recollection.  
 3 Hold on a minute.  
 4 MR. PARCHER: I have a series  
 5 of them. Why don't we just mark  
 6 them -- if it's okay with you, we've  
 7 got a series of charts, we'll mark  
 8 them as one exhibit.  
 9 MS. VLADECK: That's fine.  
 10 MR. PARCHER: If we need to  
 11 make something clearer, we'll make it  
 12 clearer. Okay?  
 13 For these purposes, I'll  
 14 represent to you that we have more  
 15 charts. Apparently the Garden does  
 16 lots of charts.  
 17 Q Is that true by the way?  
 18 A They do org charts.  
 19 Q Org charts?  
 20 A Organizational charts.  
 21 Q I am not a corporate person.  
 22 So when you say "org charts," I think what  
 23 is she saying. Then I get it.  
 24 Organizational charts.  
 25 A Organizational charts.

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1 ANUCHA BROWNE SANDERS  
 2 **there, like, more infrequently. I just --**  
 3 **I didn't really go up there as often.**  
 4 Q When did those unpleasant  
 5 meetings take place?  
 6 A **Throughout 2004.**  
 7 Q Well, but there must have  
 8 been --  
 9 MS. VLADECK: Wait, I'm sorry.  
 10 I think you interrupted her.  
 11 Could you read back.  
 12 A **In 2004 --**  
 13 MS. VLADECK: Wait, wait,  
 14 wait. She's going to read it back.  
 15 MR. PARCHER: Off the record.  
 16 (Discussion off the record.)  
 17 (Requested portion of record  
 18 read: "Q. When did those unpleasant  
 19 meetings take place?  
 20 "A. Throughout 2004.")  
 21 A **Throughout 2004 primarily,**  
 22 **yes.**  
 23 Q But it had to be begin  
 24 somewhere.  
 25 Where was the first unpleasant

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1 ANUCHA BROWNE SANDERS  
 2 incident?  
 3 A **In January 2004.**  
 4 Q What was that? Would you  
 5 describe it for us, please.  
 6 A **I handed Isiah a card. Card**  
 7 **or -- small card that had -- was just an**  
 8 **outline of the business at a glance. It**  
 9 **was just a small, almost kind of like a**  
 10 **cheat sheet. And I handed that to him,**  
 11 **and he said, "What the fuck is this?"**  
 12 Q And you said, if anything?  
 13 A **I explained to him what it**  
 14 **was.**  
 15 Q But that was unpleasant for  
 16 you, wasn't it?  
 17 A **That was unpleasant, yes.**  
 18 Q And did that give you kind of  
 19 feeling that maybe you weren't going to  
 20 get along with Isiah as well as you got  
 21 along with Scott Layden?  
 22 MS. VLADECK: Objection to  
 23 form.  
 24 A **Not necessarily. It gave me a**  
 25 **sense that he -- you know, he wasn't very**

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1 ANUCHA BROWNE SANDERS  
 2 **clear on what the purpose of the card was,**  
 3 **and that's how he chose to ask me.**  
 4 Q So you didn't get a bad -- a  
 5 feeling as that being a sign as to the  
 6 fact that you weren't going to have a good  
 7 relationship? That didn't give you that  
 8 feeling?  
 9 A **Not at that particular time.**  
 10 Q What was the next -- so that  
 11 didn't stop you from going up to the  
 12 practice facility, right? That particular  
 13 incident.  
 14 A **That didn't happen at the**  
 15 **practice facility.**  
 16 Q I know. But that's how we  
 17 started asking the question about  
 18 incidents. You said after some unpleasant  
 19 incidents you stopped going over there or  
 20 more or less you stopped going up there as  
 21 often.  
 22 MS. VLADECK: Objection to  
 23 form.  
 24 Q You recall that, don't you,  
 25 testifying to that?

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1 ANUCHA BROWNE SANDERS  
 2 MS. VLADECK: Objection to  
 3 form. You are mischaracterizing.  
 4 Objection to form.  
 5 MR. PARCHER: Your witness  
 6 says she does recall that.  
 7 MS. VLADECK: That's why we  
 8 have transcripts.  
 9 MR. PARCHER: No. That's why  
 10 we have witnesses. That's why we  
 11 have witnesses, real live people to  
 12 answer questions.  
 13 Q So when was the next incident  
 14 that was unpleasant?  
 15 A **There were a few meetings that**  
 16 **I had in his office to discuss player**  
 17 **appearances.**  
 18 Q When was that?  
 19 A **In end of January, beginning**  
 20 **of February time frame of 2004.**  
 21 Q And did these incidents -- are  
 22 they separate in your mind, or do they all  
 23 run on into an event that you would  
 24 describe for us?  
 25 MS. VLADECK: Objection to

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1 ANUCHA BROWNE SANDERS  
 2 form.  
 3 **A I don't understand that**  
 4 **question.**  
 5 Q You said there was a series of  
 6 meetings. I could take them one by one,  
 7 or I could ask you to describe the  
 8 meetings and the unpleasantries, whichever  
 9 you are more comfortable with.  
 10 Tell us what happened, who was  
 11 present, when it was, where it was, what  
 12 was said.  
 13 **A I would try to meet with Isiah**  
 14 **once a week, as a calendar meeting,**  
 15 **similar to what I was doing with**  
 16 **Scott Layden, which was at the direction**  
 17 **of Steve Mills.**  
 18 **So I met with him at his**  
 19 **office, and just to take him through**  
 20 **anything that was relevant to the**  
 21 **business.**  
 22 **And his responses were**  
 23 **hostile. He cursed. You know, he would**  
 24 **say things like "What the fuck is this,**  
 25 **what do you want, what the fuck are you**

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1 ANUCHA BROWNE SANDERS  
 2 **doing here, I can't be bothered with this**  
 3 **shit." It was hostile.**  
 4 **And it was very apparent that**  
 5 **he didn't want to be bothered with it.**  
 6 Q He didn't want to be bothered  
 7 with the subject that you were talking to  
 8 him about?  
 9 MS. VLADECK: Objection to  
 10 form.  
 11 **A With whatever I was discussing**  
 12 **with him.**  
 13 Q Okay. And was anybody  
 14 present --  
 15 I gather this was a series of  
 16 meetings, right?  
 17 **A End of January/February time**  
 18 **frame.**  
 19 Q And was anybody else present  
 20 at any of these meetings other than you  
 21 and Mr. Thomas?  
 22 **A No, not that I recall. These**  
 23 **were meetings in his office. And they**  
 24 **were scheduled.**  
 25 Q And you found it unpleasant?

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1 ANUCHA BROWNE SANDERS  
 2 **A Yes.**  
 3 Q You found it degrading?  
 4 **A I found it unprofessional.**  
 5 Q Was it disturbing to you?  
 6 **A Yes.**  
 7 Q Made you angry?  
 8 **A I wouldn't call it angry.**  
 9 Q Sad?  
 10 **A It was disturbing.**  
 11 Q Disturbing.  
 12 Did you report it to  
 13 Steve Mills?  
 14 **A Yes.**  
 15 Q On one or more than one  
 16 occasion? And we're talking now in this  
 17 January/February period.  
 18 **A I told Steve in early**  
 19 **February -- actually, I told him -- it was**  
 20 **probably toward the end of January, early**  
 21 **February. I don't remember the exact**  
 22 **timing, but it was right in that period.**  
 23 Q In other words, right at the  
 24 beginning, when it happened you went and  
 25 told Steve Mills; is that what you are

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1 ANUCHA BROWNE SANDERS  
 2 testifying to?  
 3 **A Not after each meeting.**  
 4 Q You let it go once or twice?  
 5 **A Yeah, I let it go once or**  
 6 **twice, yeah.**  
 7 Q And then you went to see  
 8 Steve, right?  
 9 **A Yes.**  
 10 Q You didn't make a memo?  
 11 **A Not at that time. I don't**  
 12 **remember making a memo.**  
 13 Q You didn't send an e-mail?  
 14 **A No, I don't recall sending an**  
 15 **e-mail.**  
 16 Q You didn't go to HR?  
 17 **A No, I didn't.**  
 18 Q What's John Moran's job at HR?  
 19 MS. VLADECK: Objection to  
 20 form.  
 21 Q If you know?  
 22 **A He's the vice president of**  
 23 **human resources.**  
 24 Q And is he -- if you know, is  
 25 he also the person -- bear with me. I'll



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1 ANUCHA BROWNE SANDERS  
 2 Q Sorry?  
 3 A I said he pulled me into the  
 4 room.  
 5 Q Okay. And he opened the door?  
 6 A Yes.  
 7 Q And inside the room, did he  
 8 close the door?  
 9 A Yes, he did.  
 10 Q Bang it or shut it softly or  
 11 how did he close it?  
 12 MS. VLADECK: Objection to  
 13 form.  
 14 A He just closed the door.  
 15 Q Let go of your arm?  
 16 A Yes.  
 17 Q Now, in this Complaint -- I'm  
 18 reading it to you -- you say, "He yelled  
 19 that the team was not going to do anymore  
 20 F-ing events. Browne Sanders calmly told  
 21 Thomas that we require the Knicks to do  
 22 community events and that he  
 23 should discuss his concerns with Mills.  
 24 Thomas continued to scream at  
 25 Browne Sanders calling her a F-ing bitch,

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1 ANUCHA BROWNE SANDERS  
 2 among other things. He eventually stormed  
 3 out of the room."  
 4 Is that accurate?  
 5 A Yes.  
 6 Q So the man was screaming at  
 7 you?  
 8 A Yes.  
 9 Q Did you ever find out whether  
 10 or not somebody screams at you in a bike  
 11 room, a screaming voice could be heard  
 12 outside the bike room?  
 13 A It didn't occur to me. It was  
 14 still crowded in the arena.  
 15 Q Would it surprise you if I  
 16 told you that I went there and I checked  
 17 it out and it can be heard clear as a  
 18 bell?  
 19 MS. VLADECK: Objection to  
 20 form.  
 21 Q Would that surprise you?  
 22 A No, it wouldn't.  
 23 Q But you still say that the man  
 24 was screaming at you?  
 25 A Yes.

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1 ANUCHA BROWNE SANDERS  
 2 Q Spewing curses?  
 3 A Spewing curses.  
 4 Q Now, do you have any witnesses  
 5 that heard that?  
 6 A I don't know. I didn't ask  
 7 anybody if they heard it.  
 8 Q Well, at some point you made a  
 9 decision that you were going to leave the  
 10 Garden, correct?  
 11 A Yes.  
 12 MS. VLADECK: Objection to  
 13 form.  
 14 Q And at or around that time --  
 15 A Wait. I'm sorry.  
 16 Explain "leave the Garden."  
 17 Q Resign.  
 18 A No.  
 19 Q You were never going to  
 20 resign?  
 21 A No.  
 22 Q You didn't go up to  
 23 Steve Mills in November of '05 and tell  
 24 him that you wanted to leave for whatever  
 25 your reasons?

173

1 ANUCHA BROWNE SANDERS  
 2 We'll get into it, if the  
 3 clock doesn't tick.  
 4 A No.  
 5 Q I may have to go make an  
 6 application.  
 7 MS. VLADECK: Objection to  
 8 form.  
 9 Q What?  
 10 A Could you ask the question  
 11 again?  
 12 (Requested portion of record  
 13 read: "Q. You didn't go up to  
 14 Steve Mills in November of '05 and  
 15 tell him that you wanted to leave for  
 16 whatever your reasons?")  
 17 A No, I did not.  
 18 Q Never?  
 19 A No.  
 20 Q And if Mills, your friend said  
 21 that, he would be inaccurate?  
 22 MS. VLADECK: Objection to  
 23 form.  
 24 Q If Mills said that, it would  
 25 be inaccurate?

174

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 to hear me. It's ridiculous."  
 3 Did you say anything like that  
 4 to Steve?  
 5 A I told Steve. I told Steve  
 6 what transpired in those meetings.  
 7 Q Each time?  
 8 A Not after each one. But I  
 9 told him. As they started to become more  
 10 regular, I certainly told him.  
 11 Q I'm just referring to these  
 12 three now -- these three meetings.  
 13 Did you tell him after each  
 14 meeting?  
 15 A No, not after each meeting.  
 16 Q After how many meetings did  
 17 you tell him?  
 18 A I would say after two, maybe  
 19 three.  
 20 Q So after all of those three;  
 21 is that you are what saying?  
 22 A No. I said that the first  
 23 time when I gave him the cheat sheet and  
 24 he said that to me.  
 25 Q I am not on the cheat sheet.

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1 ANUCHA BROWNE SANDERS  
 2 A Okay. But that's all part of  
 3 the series of meetings that I'm referring  
 4 to because we're in January, early  
 5 February.  
 6 Q Okay.  
 7 So it was only once that you  
 8 went to Mills, or more than once?  
 9 MS. VLADECK: Objection to  
 10 form.  
 11 A It was more than once.  
 12 Q And each time he sat there  
 13 quietly? Didn't respond?  
 14 MS. VLADECK: Objection to  
 15 form. Asked and answered.  
 16 Mischaracterizes the record.  
 17 A Yes.  
 18 Q Yes. Okay.  
 19 Now, after the arm-pulling  
 20 incident, what was the next incident  
 21 between you and Isiah, if any, that was  
 22 disturbing to you?  
 23 A March.  
 24 Q When in March was that?  
 25 A We continued to have

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1 ANUCHA BROWNE SANDERS  
 2 conversations. I don't -- I didn't -- I  
 3 can't pinpoint the actual meetings, but  
 4 when I could update him, if he was in the  
 5 office, I tried to. Even if it was in  
 6 passing in the conference room, I would  
 7 try and update him.  
 8 But the meeting that I can  
 9 pinpoint is -- took place on March 23rd.  
 10 It was conversation over the phone.  
 11 Q Had he cursed at you or cursed  
 12 in your presence between the meetings you  
 13 described in January/February and the  
 14 March incident that -- what I'm about to  
 15 ask you about?  
 16 A Yes.  
 17 Q Could you tell us on each  
 18 occasion when and where, who was present  
 19 and what was said?  
 20 A Steve asked me to have  
 21 meetings with him to discuss player  
 22 appearances. There were a number of  
 23 issues with player appearances, and he  
 24 asked me to meet with him. And so I did.  
 25 Q "He," Isiah? Or "he," Steve?

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1 ANUCHA BROWNE SANDERS  
 2 A Steve asked me to meet with  
 3 Isiah.  
 4 And on those occasions I met  
 5 with him and he was very unhappy with the  
 6 frequency of the player appearances and,  
 7 you know, made it clear that he wasn't  
 8 happy with it.  
 9 Q Well, did he make that clear  
 10 in the three meetings that you described  
 11 before when he was using profanity?  
 12 A Those three meetings were more  
 13 update meetings. And these following  
 14 meetings were end of February/early March,  
 15 and they were -- I was directed by Steve  
 16 to meet with him on player appearances.  
 17 Q So how often did you go in to  
 18 see him in late February, early March on  
 19 player appearances?  
 20 MS. VLADECK: What year?  
 21 Q We're talking about '04?  
 22 A Early '04, yes.  
 23 Q Yeah.  
 24 A I wouldn't say that they're  
 25 scheduled meetings. So there were maybe

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1 ANUCHA BROWNE SANDERS  
 2 two, three.  
 3 Q And where would these meetings  
 4 take place?  
 5 A Either in his office or the  
 6 conference room.  
 7 Q At Madison Square Garden?  
 8 A Yes.  
 9 Q Was Isiah in that office area  
 10 very frequently while he worked at the  
 11 Garden when you were there?  
 12 MS. VLADECK: Objection to  
 13 form.  
 14 Q You could use your definition  
 15 of frequently. You don't need to use  
 16 mine.  
 17 A He was there -- typically, on  
 18 a game day he was there, or if there was  
 19 an office of the chairman meeting, he was  
 20 there. It wasn't as -- in comparison to  
 21 Scott, it wasn't as frequent, but he was  
 22 there.  
 23 Q Approximately once a week?  
 24 A No. More than once a week.  
 25 Q Approximately twice a week?

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1 ANUCHA BROWNE SANDERS  
 2 A It could have been three times  
 3 a week, but it wasn't a full day. He  
 4 would come in, maybe be there for an hour  
 5 and leave. He would come in and be there  
 6 for three hours and leave. So it varied.  
 7 Q So all in all, in a typical  
 8 week, how long would you say Isiah spent  
 9 at the Garden offices?  
 10 MS. VLADECK: Objection to  
 11 form.  
 12 A I don't know. I didn't keep  
 13 track of the hours that he was in the  
 14 office.  
 15 Q I'm asking for an  
 16 approximation.  
 17 A The only -- I can't give you  
 18 an approximation because I only dealt with  
 19 Isiah when I needed to. So I can't tell  
 20 you how long he was in the office.  
 21 Q Would you see him when he  
 22 walked into the offices?  
 23 His office was near you,  
 24 wasn't it?  
 25 MS. VLADECK: Objection to

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1 ANUCHA BROWNE SANDERS  
 2 form.  
 3 A His office was on the other  
 4 side, but he typically went down the  
 5 corridor. He didn't pass my office to get  
 6 to his. So he could have been there, he  
 7 might not have been there. I wasn't  
 8 keeping track.  
 9 Q So approximately twice, you  
 10 went in there to report to him in late  
 11 February, early March what happened?  
 12 A You said approximately twice?  
 13 Q That's what you said, I  
 14 thought.  
 15 A We were talking about meetings  
 16 in February and I mentioned three. And  
 17 then you asked me -- I told you about the  
 18 player appearance meetings that Steve  
 19 directed me to have with him. And I met  
 20 with him approximately two times on that,  
 21 maybe three.  
 22 Q He cursed at you then?  
 23 A Yes, he did.  
 24 Q What did he say?  
 25 A It was to the effect of "what

217

1 ANUCHA BROWNE SANDERS  
 2 the fuck is this." It was -- he continued  
 3 to ask me "what the fuck is this." "This  
 4 is -- you know, I'm trying to get this  
 5 fucking team ready to play. What are all  
 6 these fucking events?"  
 7 Q So the cursing wasn't  
 8 directed -- you used this distinction  
 9 before, didn't you?  
 10 The cursing wasn't directed at  
 11 you, the person, but just the  
 12 circumstance; is that a fair --  
 13 MS. VLADECK: Objection to  
 14 form.  
 15 A Depended on the meeting.  
 16 Q Well, it -- excuse me.  
 17 In the arm grab incident, he  
 18 took you to the bike room and he cursed at  
 19 you, correct?  
 20 A Yes, he did.  
 21 Q In these other meetings that  
 22 you are describing now, approximately five  
 23 or six of them, was he cursing at you, or  
 24 was he using profanity?  
 25 MS. VLADECK: Objection to

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1 ANUCHA BROWNE SANDERS  
 2 form.  
 3 A It varied. There was some  
 4 meetings where he just used profanity.  
 5 There were others where he was directing  
 6 it at me and he called me a "fucking  
 7 bitch."  
 8 Q On one or more than one  
 9 occasion in those five or six meetings?  
 10 A I would say on more than one  
 11 occasion. In those five or six meetings,  
 12 it was probably three times. But when he  
 13 started this cursing, he was spewing  
 14 curses. So it was a mixture of he was  
 15 referring to the situation and then he was  
 16 referring to me.  
 17 Q Did you go back to Mills and  
 18 report to him and tell him what was going  
 19 on?  
 20 A Yes.  
 21 Q At the weekly meetings, or  
 22 right after it happened?  
 23 MS. VLADECK: Objection to  
 24 form.  
 25 A It depended on the event.

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1 ANUCHA BROWNE SANDERS  
 2 There were times I went to him right  
 3 after. And as I said earlier, I was  
 4 trying not to be in his office complaining  
 5 all the time.  
 6 Q Leaving that aside, what you  
 7 were trying not to do, I'm getting an  
 8 impression that five or six times you went  
 9 into this man's office and he was cursing  
 10 at you all the time and making it very  
 11 unpleasant and uncomfortable and miserable  
 12 for you, right?  
 13 MS. VLADECK: Objection to  
 14 form.  
 15 A It wasn't always in his  
 16 office. Sometimes it was in the  
 17 conference room. But yes, that's  
 18 accurate.  
 19 Q But that's accurate, right?  
 20 And very, very different than  
 21 the way it was under Scott Layden, right?  
 22 A It was different, yes.  
 23 Q Where you were very  
 24 comfortable in having these interactions  
 25 with the general manager under Layden,

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1 ANUCHA BROWNE SANDERS  
 2 weren't you?  
 3 MS. VLADECK: Objection to  
 4 form.  
 5 A I was comfortable with Scott,  
 6 yes.  
 7 Q Now, did you go into Mills at  
 8 any time -- this is in the February, March  
 9 period -- and say -- not in exact words  
 10 but in concept -- "This is impossible, I  
 11 can't talk to the man. Every time I talk  
 12 to the man he's cursing at me"?  
 13 A I made Steve very much aware  
 14 of it, and I did complain. I said, "This  
 15 is not a comfortable environment. He  
 16 can't just curse me out." And I made it  
 17 very clear to him, especially the evening  
 18 of March 23rd, that this -- it could not  
 19 continue like this. This is absolutely  
 20 outrageous.  
 21 Q Before March 23, had you made  
 22 it clear to him that it could not  
 23 continue, that it was outrageous?  
 24 A Yes, I did.  
 25 Q So March 23rd was just a

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1 ANUCHA BROWNE SANDERS  
 2 culmination of that period; it wasn't the  
 3 first time you made it clear, right?  
 4 A I think after he called me a  
 5 "fucking bitch" and "ho," it made it very  
 6 clear to me that Steve had to step in.  
 7 Q Was that the March 23rd  
 8 incident or the incidents before?  
 9 A The "fucking bitch" or the  
 10 "ho."  
 11 MS. VLADECK: Objection to  
 12 form.  
 13 Q It isn't so much of the words.  
 14 I am not minimizing the words.  
 15 But it isn't so much the  
 16 words, as to cursing at you as  
 17 distinguished from using profanity.  
 18 You make that distinction,  
 19 right?  
 20 MS. VLADECK: Objection to  
 21 form.  
 22 A I'm sorry. I didn't  
 23 understand.  
 24 Q Well, when the man says "what  
 25 the fuck am I doing here" or words to that

222

1 ANUCHA BROWNE SANDERS  
 2 effect, or some of the things you said, he  
 3 said at the advertising meeting, "don't  
 4 waste my fucking time" -- he's not cursing  
 5 at anybody, he is using profanity, you  
 6 understand that, right?  
 7 A Yes.  
 8 Q And I believe you testified  
 9 that in the five or six meetings you  
 10 described -- we're not in the March 23rd,  
 11 24th meeting; yet -- but up until that  
 12 time, sometimes he used profanity and  
 13 sometimes he was spewing curses at you,  
 14 correct?  
 15 A Yes.  
 16 Q And you told that to Steve on  
 17 more than one occasion?  
 18 A Yes.  
 19 Q That it was impossible and  
 20 it's got to stop?  
 21 A I didn't say it wasn't  
 22 possible.  
 23 MS. VLADECK: Objection to  
 24 form.  
 25 Q What did you say?

223

1 ANUCHA BROWNE SANDERS  
 2 A That's not what I said.  
 3 Q What did you say?  
 4 A I said this is unprofessional  
 5 and it needs -- we need to settle this and  
 6 figure out how we can work together.  
 7 Q Did it ever get settled?  
 8 Because I got the impression from your  
 9 Complaint that this continued throughout  
 10 the entire year of '04?  
 11 MS. VLADECK: Objection to  
 12 form.  
 13 A My interactions with him were  
 14 less frequent, but it continued.  
 15 Q Was there ever a time that you  
 16 were with that man having an interaction  
 17 in the year '04, that he didn't curse at  
 18 you and use profanities?  
 19 A Very rarely. And only in  
 20 public.  
 21 Q But if it was the two of you  
 22 privately, he always cursed at you and  
 23 used profanities?  
 24 A Yes.  
 25 Q And how many times in '04,

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1 ANUCHA BROWNE SANDERS  
 2 counting the five or six that you've told  
 3 us about, how many times did you have  
 4 these private interactions with him in the  
 5 year '04?  
 6 A I think I just described about  
 7 eight, right? About eight.  
 8 Q I'm not getting the eight.  
 9 Maybe I'm missing something.  
 10 A There were a few meetings to  
 11 discuss player appearances. I want to say  
 12 three.  
 13 Q Three.  
 14 A There were about  
 15 three-some-odd meetings -- yeah, about  
 16 three meetings prior to that that were  
 17 just update meetings.  
 18 Q This was all in  
 19 January/February?  
 20 A Yes. January/February, early  
 21 March.  
 22 There was the meeting in  
 23 January -- that's seven -- where I handed  
 24 him the cheat sheet.  
 25 Q The cheat sheet, that's seven.

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1 ANUCHA BROWNE SANDERS  
 2 A And then after the -- and then  
 3 in March 23rd, that discussion that we  
 4 had. So that's eight.  
 5 And then after that point, I  
 6 met with him less frequently, but those --  
 7 and most of those meetings took place in  
 8 the conference room as opposed to his  
 9 office, most of them. But, yes, we would  
 10 sit down and we would discuss things, and  
 11 he would continue to use profanity with  
 12 me.  
 13 Q How many times,  
 14 approximately -- I understand that you  
 15 don't have the exact number -- would you  
 16 say, after the March discussions that you  
 17 had, that you met with Isiah in the  
 18 conference room, or anyplace where it was  
 19 just the two of you, to discuss whatever,  
 20 where he cursed at you and used profanity  
 21 in the year '04?  
 22 A I would say several.  
 23 Q Well, let's do this.  
 24 A What several --  
 25 Q I'm asking you to put a number

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1 ANUCHA BROWNE SANDERS  
 2 on it. And I'm understanding, by the  
 3 way --  
 4 A Seven.  
 5 Q -- it's not the exact number.  
 6 A I would say seven or eight.  
 7 About seven or eight.  
 8 Q And this was -- so this would  
 9 be, like, every month? You got about nine  
 10 months left between March -- about eight  
 11 months left after March.  
 12 A Yeah, could have been more.  
 13 That's why it's hard to pinpoint, but --  
 14 yeah.  
 15 Q Do you remember any specifics  
 16 of those meetings, starting with the first  
 17 and continuing to the last, all in '04?  
 18 A Yes. Are you talking about  
 19 the 23rd incident or the 24th incident?  
 20 Q Skipping that for the moment,  
 21 I promise you I'm going to question you  
 22 about that. I have no doubt about that.  
 23 Talking about the other seven  
 24 or eight that occurred after that.  
 25 A Yeah, I mean, there were

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1 ANUCHA BROWNE SANDERS  
 2 meetings where we discussed -- there was a  
 3 meeting where we discussed the draft and  
 4 some logistics around the draft, and he  
 5 was hostile.  
 6 Q When was that?  
 7 A In the May time frame.  
 8 Q What did he say to you, and  
 9 what did you say to him?  
 10 A It was a discussion about -- I  
 11 think it was a discussion about how we  
 12 could possibly use him during the draft.  
 13 And he was -- I don't remember his exact  
 14 words. I just remember the hostility and  
 15 the cursing.  
 16 Q What did he say? Did he curse  
 17 at you, or use profanity?  
 18 MS. VLADECK: Objection to  
 19 form.  
 20 A He cursed at me.  
 21 Q What did he say?  
 22 A Very regularly, "fucking  
 23 bitch."  
 24 Q Anything else?  
 25 A That's what stands out.

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1 ANUCHA BROWNE SANDERS  
 2 Q And so he would do that how  
 3 often in '04? And again, I'll keep  
 4 telling you, if you say 10, it turns out  
 5 you want to say 11 in the courthouse, I'm  
 6 not going to say, "Ha, ha, you only said  
 7 10." I understand you are giving your  
 8 best approximation.  
 9 A Say seven, eight times over  
 10 the course of the rest of the year.  
 11 Q So for a total of how many in  
 12 the 12-month period, January '04 to  
 13 December 31, '04?  
 14 MS. VLADECK: Objection to  
 15 form.  
 16 A About twenty.  
 17 Q Twenty times?  
 18 A Yes.  
 19 Q Now, each time that he did it,  
 20 did you go in and tell Steve Mills?  
 21 A No, I didn't.  
 22 Q Did there come a time when you  
 23 stopped telling Steve Mills?  
 24 A No. I consistently told him.  
 25 But I wasn't running to his office every

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1 ANUCHA BROWNE SANDERS  
 2 other -- every single time I had an  
 3 interaction with Isiah.  
 4 Q And each time, it was  
 5 disturbing to you, wasn't it?  
 6 MS. VLADECK: Objection to  
 7 form.  
 8 A Yes, it was.  
 9 Q Each time was upsetting to  
 10 you?  
 11 A Depends what he called me.  
 12 "Fucking ho," "fucking bitch" was very  
 13 upsetting.  
 14 Q And did you tell that to Mills  
 15 each time? "This is really upsetting to  
 16 me"?  
 17 MS. VLADECK: Objection to  
 18 form. Asked and answered.  
 19 A Yes.  
 20 Q And it didn't stop, did it,  
 21 for the whole year?  
 22 A No, it didn't.  
 23 Q Now, at any time during that  
 24 year, did it ever run through your mind,  
 25 this business of just telling Mills what's

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1 **ANUCHA BROWNE SANDERS**  
 2 **would be more of a conduit between me and**  
 3 **Isiah, as opposed to me having direct**  
 4 **meetings with him.**  
 5 Q When did Steve decide that?  
 6 A **After he started professing**  
 7 **his love for me.**  
 8 Q So throughout '04 -- let's  
 9 change my question around. Maybe make it  
 10 a narrower question if I can.  
 11 Throughout the year '04, did  
 12 it ever occur to you that you could avoid  
 13 meeting alone with Isiah Thomas, given  
 14 what he was doing every time you got in a  
 15 meeting alone with him?  
 16 MS. VLADECK: Objection to  
 17 form.  
 18 A **No. I was focused on trying**  
 19 **to work through and do my job.**  
 20 Q So it never crossed your mind  
 21 that maybe when you had a meeting with  
 22 Isiah Thomas, you could bring somebody  
 23 with you as part of the meeting?  
 24 A **No, not at my level. I didn't**  
 25 **feel like it was appropriate to bring**

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1 **ANUCHA BROWNE SANDERS**  
 2 **somebody along to meet with Isiah just to**  
 3 **be able to meet with him.**  
 4 Q Well, after a period of time,  
 5 weren't you just sort of knowing that you  
 6 were going to be cursed at every time you  
 7 walked in there to talk to him about  
 8 something that you thought you were  
 9 supposed to be talking to him about?  
 10 A **Well, my expectation was that**  
 11 **Steve was going to be working with him.**  
 12 **That wasn't happening. And I continued to**  
 13 **meet with him so I could get my job done.**  
 14 Q So I'm asking you: Did it  
 15 occur to you during '04 at any time to  
 16 avoid meeting with him alone so you didn't  
 17 get this cursing at you?  
 18 MS. VLADECK: Objection to  
 19 form. Asked and answered.  
 20 A **Not necessarily. I just was**  
 21 **more focused on trying to get my job done.**  
 22 Q Did you ever say to Mills,  
 23 "Hey, you got to have somebody in there  
 24 when I'm talking to him. I can't talk to  
 25 this man alone"?

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1 **ANUCHA BROWNE SANDERS**  
 2 A **No.**  
 3 Q You never said that to him?  
 4 A **No.**  
 5 Q Did you ever say to Mills in  
 6 '04, "We've got to bring human resources  
 7 into this. You are not getting the  
 8 situation cleared up"?  
 9 A **No.**  
 10 MS. VLADECK: Objection to  
 11 form.  
 12 Q Did it ever occur to you to  
 13 say that to him?  
 14 A **Not to Steve.**  
 15 Q Not to Steve?  
 16 A **No.**  
 17 Q Did you say it to anybody in  
 18 the company, "I got to get HR involved in  
 19 it" during the year '04?  
 20 A **No.**  
 21 Q Is there a reason you didn't?  
 22 MS. VLADECK: Asked and  
 23 answered.  
 24 A **Steve was my direct manager.**  
 25 Q But he wasn't getting the job

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1 **ANUCHA BROWNE SANDERS**  
 2 done.  
 3 Did you tell that to Steve?  
 4 MS. VLADECK: Objection to  
 5 form. Asked and answered.  
 6 A **Steve was getting -- I was**  
 7 **focused on getting my job done, and my**  
 8 **expectations was that Steve would deal**  
 9 **with it. And I think he did get**  
 10 **Pete Olsen involved at one point.**  
 11 Q In the course of the year  
 12 2004, you described a number of incidents,  
 13 and then you recounted for me a number of  
 14 incidents, all told around 20 -- don't  
 15 hold me to the number, could be a little  
 16 less, could be a little more, I don't care  
 17 about the number -- but around 20, where  
 18 you would walk into Isiah's -- and just  
 19 about every time you got in there, whether  
 20 it was the conference room or his office,  
 21 as long as it was the two of you, he was  
 22 cursing at you and using profanity and  
 23 making it miserable, right?  
 24 MS. VLADECK: Objection to  
 25 form.



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1 ANUCHA BROWNE SANDERS  
 2 A Yes.  
 3 Q And you originally told Mills,  
 4 that he was quiet, I believe you  
 5 testified, and you thought to yourself  
 6 he's probably going to take speak to Isiah  
 7 directly and straighten this out.  
 8 Do you remember telling me  
 9 that this morning?  
 10 MS. VLADECK: Objection to  
 11 form.  
 12 A Yes.  
 13 Q And at some point, happens one  
 14 time, happens two times, happens three  
 15 times, happens four times, it happens five  
 16 times and so on, does it cross your mind  
 17 that Steve Mills is not getting the job  
 18 done, he is not getting Isiah to stop?  
 19 Does that ever cross your  
 20 mind?  
 21 A Yes.  
 22 Q Do you say it to Mills?  
 23 A No.  
 24 Q Now, you and Mills -- and I am  
 25 not making this larger than life.

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1 ANUCHA BROWNE SANDERS  
 2 But you've acknowledged that  
 3 you and Mills were friends or friendly in  
 4 a business sense?  
 5 MS. VLADECK: Objection to  
 6 form.  
 7 Q Correct?  
 8 MS. VLADECK: Asked and  
 9 answered. Mischaracterizes the  
 10 testimony.  
 11 A Yes.  
 12 Q Were you afraid to say to  
 13 Mills, "What in the world is going on  
 14 here? This guy keeps cursing at me.  
 15 Enough."  
 16 Did it ever occur to you to  
 17 say that?  
 18 A I had those conversations with  
 19 Steve.  
 20 Q What do you say --  
 21 MS. VLADECK: Let her finish.  
 22 A I had the conversations with  
 23 Steve. We were also at a point -- the  
 24 team was losing horribly, there was a lot  
 25 of pressure on Steve. And so I would

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1 ANUCHA BROWNE SANDERS  
 2 continue to raise these issues in the  
 3 hopes that he would deal with it.  
 4 Q What was the basis of your  
 5 hopes after the first, second, third,  
 6 fourth, fifth, sixth, seventh, eighth and  
 7 so on time? What was the basis of your  
 8 hope that he would deal with it? "He,"  
 9 Steve.  
 10 MS. VLADECK: Objection to  
 11 form. Argumentative.  
 12 A That I had respect for him and  
 13 that I reported to him and that I had to  
 14 trust that he was going to get something  
 15 done.  
 16 Q So for the entire year of  
 17 2004, the situation continued as bad, if  
 18 not worse, and yet you never said to Steve  
 19 "Enough is enough, we've got to straighten  
 20 this out right now"?  
 21 MS. VLADECK: Objection to  
 22 form. Objection to form.  
 23 A I did say that to Steve.  
 24 Q And did you straighten it out?  
 25 How did you straighten it out?

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1 ANUCHA BROWNE SANDERS  
 2 MS. VLADECK: Objection to  
 3 form.  
 4 A I said to Steve, "We have to  
 5 have a meeting." And we did have a  
 6 meeting.  
 7 Q That was in March?  
 8 A Yes.  
 9 Q After March, between March and  
 10 December, how did you straighten it out?  
 11 How did you have a meeting?  
 12 MS. VLADECK: Objection to  
 13 form.  
 14 A I just continued to bring to  
 15 his attention what was going on.  
 16 Q How often did this man call  
 17 you, in '04, a bitch or fucking bitch and  
 18 a ho?  
 19 MS. VLADECK: Objection to  
 20 form.  
 21 A Are you asking me to quantify  
 22 the bitch, the ho or the fucking bitch,  
 23 fucking ho? Because many of the  
 24 interactions, he was spewing curses.  
 25 Q Well, best you can.

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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.

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1 ANUCHA BROWNE SANDERS  
 2 accommodate him. Give him what he wants.  
 3 Accommodate him."  
 4 And at that point I was  
 5 really -- the end of the meeting and I  
 6 left.  
 7 Q So were you unhappy with the  
 8 result of the meeting?  
 9 MS. VLADECK: Objection to  
 10 form.  
 11 A I was unhappy with some of the  
 12 results, and happy about some of them.  
 13 Q And what specifically were you  
 14 unhappy about?  
 15 A Well, the night before when he  
 16 was calling me a bitch and a ho and asking  
 17 me what the fuck I was responsible for,  
 18 and I was explaining to him and he said,  
 19 "I don't like this setup. What am I here  
 20 to do, just trade fucking players?"  
 21 And I said -- I asked him -- I  
 22 said, "You really need to talk to Steve  
 23 about it." So I was happy and encouraged  
 24 with the meeting when he had me  
 25 clarify what my roles and responsibilities

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1 ANUCHA BROWNE SANDERS  
 2 to Isiah.  
 3 Q What did he say they were?  
 4 A Exactly what I said. I was  
 5 P&L manager responsible for the business  
 6 operations, the business side of the team,  
 7 the revenue streams, marketing, new media,  
 8 Web, game presentation, community  
 9 relations, alumni relations. We went  
 10 through fan development and all the rest  
 11 of my responsibilities. And he confirmed  
 12 that that was my role.  
 13 Q How about budgets, was that  
 14 your responsibility?  
 15 A Yeah. It was a collaborative  
 16 responsibility, yes.  
 17 Q Collaborative with who?  
 18 MS. VLADECK: Objection to  
 19 form.  
 20 A Well, as P&L manager, there  
 21 were parts of the P&L that I was  
 22 responsible for that were directly  
 23 influenced by my peers. So there were  
 24 other people in the senior vice president  
 25 role that influenced and also had direct

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1 ANUCHA BROWNE SANDERS  
 2 responsibility for parts of the P&L.  
 3 Q But the ultimate  
 4 responsibility for P&L and the budgeting  
 5 at the Garden, as related to the Knicks,  
 6 was yours, correct?  
 7 MS. VLADECK: Objection to  
 8 form.  
 9 A I would consider myself a P&L  
 10 manager, and in that role, I had people  
 11 providing me information.  
 12 The ultimate ownership of the  
 13 P&L --  
 14 Q Sorry. I was rude, but I did  
 15 not mean to be rude. Would you mind  
 16 saying it again.  
 17 A In my role, I was the P&L  
 18 manager. So I owned the revenue streams.  
 19 The budget process was a collaborative  
 20 process, and it involved myself, it  
 21 involved Mark Piazza who oversaw P&L for a  
 22 number of different entities, as well as  
 23 Brian LaFemina who oversaw suites and  
 24 tickets and some of the ticket sales  
 25 responsibilities.

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1 ANUCHA BROWNE SANDERS  
 2 Q Whatever your responsibilities  
 3 were concerning the budget, do you feel  
 4 you were competent to do that?  
 5 A Yes.  
 6 Q And you didn't have any  
 7 particular difficulty in doing that?  
 8 A No. I think -- I didn't  
 9 feel -- it was a difficult -- and it was a  
 10 laborious process, but I didn't have  
 11 difficulty.  
 12 Q Nobody criticized you for the  
 13 way you presented the budget?  
 14 MS. VLADECK: Objection to  
 15 form.  
 16 A Criticize? No. It wasn't  
 17 criticism on how I presented the budget.  
 18 Q Nobody recommended that you  
 19 take a course so you can learn how to do  
 20 it?  
 21 A No. That wasn't -- no.  
 22 Q That never happened?  
 23 A No one criticized how I  
 24 presented the budget and recommended that  
 25 I take a class because of that, no.

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1 ANUCHA BROWNE SANDERS  
 2 Q So as far as you were  
 3 concerned, at no time in the year 2005  
 4 were you ever at a meeting where there was  
 5 a negative reaction to the way you were  
 6 presenting whatever you were presenting  
 7 relating to budgeting?  
 8 MS. VLADECK: Objection to  
 9 form.  
 10 A No, that's not what occurred.  
 11 Q What occurred? Do you know of  
 12 some incident?  
 13 A Yeah. There was a discussion  
 14 with regards to a capital request.  
 15 Q When was that?  
 16 A I think July of 2005.  
 17 Q And who was present, and where  
 18 was it?  
 19 A It was a larger budget  
 20 meeting. And it involved members of the  
 21 senior management staff, and it was in  
 22 Jim Dolan's conference room.  
 23 Q And what happened?  
 24 A There was a question about a  
 25 capital expenditure and --

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1 ANUCHA BROWNE SANDERS  
 2 Q Did you know what that was?  
 3 A Yes, I did.  
 4 MS. VLADECK: Please,  
 5 Mr. Parcher, when somebody says  
 6 "and," that means there's more  
 7 coming.  
 8 Q Please continue.  
 9 A There was a question about  
 10 capital expenditure, and there was a  
 11 concern that a capital purchase had been  
 12 made without it first being approved by  
 13 Mr. Dolan.  
 14 Q And then what happened?  
 15 A Then what happened when?  
 16 Q Was there any fuss about it or  
 17 any --  
 18 A There was discussion about it.  
 19 We talked about how that might have  
 20 happened.  
 21 There was confusion -- there  
 22 was confusion with everybody in the  
 23 meeting. They didn't -- because this  
 24 capital request had been signed off on, on  
 25 how it did not go through some normal

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1 ANUCHA BROWNE SANDERS  
 2 channels.  
 3 Q You didn't get a feeling at  
 4 any time at that meeting that you were  
 5 losing the respect, professional respect,  
 6 of the persons in that room?  
 7 A No, not at all.  
 8 MS. VLADECK: Peter, when you  
 9 get to a convenient place, I need  
 10 just a two-minute break.  
 11 MR. PARCHER: We can do it  
 12 now.  
 13 MS. VLADECK: That's fine. If  
 14 you are in the middle of a line --  
 15 take a break?  
 16 THE VIDEOGRAPHER: Time is  
 17 4:33 p.m. Going off the record.  
 18 (A brief recess was  
 19 taken.)  
 20 THE VIDEOGRAPHER: Time is  
 21 4:50 p.m. We're back on the record.  
 22 Q In the approximate  
 23 two-some-odd years that you worked at the  
 24 Garden during Isiah Thomas's time, did you  
 25 ever hug Isiah Thomas?

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1 ANUCHA BROWNE SANDERS  
 2 A There may have been a greeting  
 3 where he hugged me.  
 4 Q Did you ever hug Isiah Thomas?  
 5 A I hugged him back, yes.  
 6 Q Hugged him back? When was  
 7 that?  
 8 A There was a greeting where we  
 9 were in front of season subscribers. It  
 10 was a season subscriber forum, and I  
 11 introduced him.  
 12 Q When was that? Approximate  
 13 time.  
 14 A Spring of 2005.  
 15 Q Ever a time where you gave  
 16 him -- and I don't mean anything untoward  
 17 by this -- where you gave him a kiss or  
 18 kiss on the cheek something like that,  
 19 just by way of friendly greeting or  
 20 something?  
 21 A No, I never kissed him on the  
 22 cheek.  
 23 Q Never gave him a kiss of any  
 24 kind?  
 25 A No.

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1 ANUCHA BROWNE SANDERS  
 2 A I don't know why.  
 3 Q Okay. Now, if I were to read  
 4 any of the redacted portions of your  
 5 diary, would that shed any light on that  
 6 question of why you didn't?  
 7 MS. VLADECK: Objection to  
 8 form.  
 9 Q You know, your lawyers crossed  
 10 out quite a few things in your diary.  
 11 MS. VLADECK: Excuse me. We  
 12 went to court over this. This is an  
 13 improper question to ask her. I'm  
 14 directing her to answer.  
 15 (Directive to witness.)  
 16 MR. PARCHER: You won't let  
 17 her answer whether any redacted  
 18 portion of her diary would shed light  
 19 on why she didn't ask or tell  
 20 Steve Mills --  
 21 MS. VLADECK: You can ask her  
 22 whether any part of the diary,  
 23 redacted or unredacted. Given your  
 24 question, I'm directing her not to  
 25 answer.

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1 ANUCHA BROWNE SANDERS  
 2 MR. PARCHER: So it doesn't  
 3 matter what I say, you can't answer  
 4 that question.  
 5 MS. VLADECK: That's not what  
 6 I said.  
 7 MR. PARCHER: I'm not  
 8 understanding.  
 9 MS. VLADECK: Fine. Move on.  
 10 MR. PARCHER: I need to  
 11 understand -- I might be asking --  
 12 MS. VLADECK: I am saying that  
 13 you didn't ask her -- asking really  
 14 essentially what has been redacted --  
 15 MR. PARCHER: Oh, I get it.  
 16 Q Leave out the word "redacted."  
 17 Redacted or unredacted or any other dacted  
 18 you can think of, you know.  
 19 MS. VLADECK: Objection to  
 20 form.  
 21 Q I'm asking you whether there  
 22 is anyplace in your diary that sheds light  
 23 on why you didn't tell Steve Mills, "Are  
 24 you talking to this man?"  
 25 MS. VLADECK: Objection to

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1 ANUCHA BROWNE SANDERS  
 2 form.  
 3 Q Is there any part of this  
 4 diary which would shed light on why you  
 5 didn't say to Steve Mills, "You are not  
 6 taking care of it. This stuff is still  
 7 going on"?  
 8 MS. VLADECK: Objection to  
 9 form.  
 10 And also -- I am going to  
 11 direct her not to answer. I think  
 12 that's a question that's improper. I  
 13 also think it may call for privileged  
 14 information. And I am not --  
 15 (Directive to witness.)  
 16 MR. PARCHER: Well, I don't  
 17 want any privileged information. I  
 18 actually do. I just said I don't  
 19 want it. But I am not going to get  
 20 it. But I am not asking for it.  
 21 Anyway you are telling her not to  
 22 answer the question?  
 23 MS. VLADECK: Correct.  
 24 MR. PARCHER: We'll get a  
 25 ruling.

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1 ANUCHA BROWNE SANDERS  
 2 (Marked for a ruling.)  
 3 MS. VLADECK: We have lots of  
 4 rulings to get. One more won't make  
 5 a difference.  
 6 MR. PARCHER: Sometimes these  
 7 do make a difference. You get a  
 8 little insight into a person. You  
 9 know what I mean? Don't be so sure  
 10 it won't make a difference.  
 11 Q So now we're up to -- anything  
 12 else between December 29 and March 14,  
 13 other than this so-called off-site  
 14 planning -- excuse me -- off-site private  
 15 meeting that we've been talking about?  
 16 A Not that I can remember, no.  
 17 Q So now we're into March 14.  
 18 You made an entry into your  
 19 diary on March 14. Are you familiar with  
 20 that?  
 21 A Yes.  
 22 Q And were you referring to a  
 23 game that happened -- when?  
 24 Where did this incident  
 25 happen? Let's start with that. The

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1 ANUCHA BROWNE SANDERS  
 2 March 14 incident.  
 3 A In Gate 1 at a Knicks game.  
 4 Q Same thing as December 29, not  
 5 the same facts, but the same location?  
 6 A Not in the same exact  
 7 location, no.  
 8 Q What was the difference?  
 9 A The one on March 29, he hugged  
 10 me and walked me into Gate 1 and the  
 11 locker room corridor. And that's when and  
 12 where he said that he was in love with me.  
 13 Q I must not have made my  
 14 question clear.  
 15 I am asking you about the  
 16 specific location. The 29th of December  
 17 and 14th of March, am I correct in saying  
 18 it was the same location, more or less, at  
 19 Gate 1?  
 20 A I would say more or less, yes.  
 21 Q Was it after a game?  
 22 A The March 14 incident took  
 23 place during a game.  
 24 Q During the game?  
 25 A During the game, yes.

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1 ANUCHA BROWNE SANDERS  
 2 Q At Gate 1?  
 3 A At Gate 1.  
 4 Q So the world was there to see,  
 5 if they wanted to?  
 6 A To see?  
 7 Q To see. If anybody looked  
 8 over at Gate 1, can see what was going on?  
 9 A Yes, they could see me and  
 10 Isiah standing next to each other.  
 11 Q And at this time, he also  
 12 tells you that he's in love with you?  
 13 A Yes.  
 14 Q And -- but this time he says  
 15 to you, "I know you think I'm  
 16 inappropriate," right?  
 17 A Yes.  
 18 Q And this all starts by  
 19 referring to the scar that he has, and  
 20 frankly, I can't notice it from this  
 21 distance.  
 22 But apparently you have a  
 23 scar, too, over one of your eyes?  
 24 A He started by saying he  
 25 noticed a scar over my eyebrow, yes.

400

1 ANUCHA BROWNE SANDERS  
 2 Q I guess it's just from this  
 3 distance, but I don't see it.  
 4 Do you have a scar over one of  
 5 your eyebrows?  
 6 A Yes.  
 7 Q Same place as he has his scar?  
 8 A I don't know if it's the same  
 9 place.  
 10 Q So this is the man that's been  
 11 cursing at you all of '04, correct?  
 12 A '04, yes. Until the end of  
 13 '04, yes.  
 14 MS. VLADECK: Objection to  
 15 form.  
 16 Q Now he tells you he that  
 17 notices everything about you, he notices a  
 18 scar over your eyebrow, he's got the same  
 19 one, from fighting, he says, right?  
 20 MS. VLADECK: Objection to  
 21 form.  
 22 A Yes.  
 23 Q And then he puts his arm  
 24 around you?  
 25 A No. I don't recall him

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1 ANUCHA BROWNE SANDERS  
 2 putting his arm around me at that point.  
 3 Q So there's no physical  
 4 contact?  
 5 A No.  
 6 Q And he tells you -- what --  
 7 he's in love with you?  
 8 A He said, "I think you are  
 9 beautiful and I am in love with you."  
 10 Q And didn't he say, "I know you  
 11 think I'm inappropriate"?  
 12 A "I know you think I'm  
 13 inappropriate," yes. That's exactly what  
 14 he said.  
 15 Q Did you relate that incident  
 16 to Pete Olsen on May 11 of 2005?  
 17 A I don't remember.  
 18 Q Well, would you take a look at  
 19 May 11.  
 20 A These notes?  
 21 Q Yeah. Well, I'm saying yes  
 22 without looking too closely.  
 23 Is that the Pete Olsen notes  
 24 that I showed you before, Exhibit 14?  
 25 6816 up at the top.

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1 ANUCHA BROWNE SANDERS  
 2 Are you looking at the top  
 3 of -- I can't tell, honestly, whether it's  
 4 15 or 16, but at the top of that page it  
 5 begins "Anucha says she's been very direct  
 6 with IT."  
 7 You see that there?  
 8 A Yes.  
 9 Q What incident were you  
 10 relating to Olsen at that point?  
 11 MS. VLADECK: Asked and  
 12 answered. Objection to form.  
 13 Q Was that the March 14  
 14 incident?  
 15 A No.  
 16 Q What is it?  
 17 A There were a couple of things.  
 18 MS. VLADECK: Objection to  
 19 form.  
 20 A There are a couple things that  
 21 are referenced in this paragraph.  
 22 Q Yes?  
 23 A Yes.  
 24 Q What are they?  
 25 A It says, "Anucha says she's

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1 ANUCHA BROWNE SANDERS  
 2 been direct with IT," and it says, "Nobody  
 3 tells you the truth."  
 4 That wasn't the same time, and  
 5 it also references him asking me to go  
 6 off-site. I don't see any reference to  
 7 him saying -- mentioning the scar above my  
 8 head.  
 9 Q What incident are you  
 10 referring to there?  
 11 MS. VLADECK: She's not  
 12 referring to anything. These are not  
 13 her notes.  
 14 Q These notes are inaccurate?  
 15 You didn't report this information, as set  
 16 forth in that paragraph, to Pete Olsen?  
 17 MS. VLADECK: Objection to  
 18 form.  
 19 MR. PARCHER: If you have a  
 20 speaking objection one more time,  
 21 we'll go outside and --  
 22 MS. VLADECK: We can have the  
 23 witness leave right now. I have no  
 24 problem with that.  
 25 MR. PARCHER: I have a problem

404

1 ANUCHA BROWNE SANDERS  
 2 with that.  
 3 MS. VLADECK: I have no  
 4 problem with having the witness here.  
 5 I have a problem --  
 6 MR. PARCHER: I have a problem  
 7 with you doing it, and you've done it  
 8 twice today --  
 9 MS. VLADECK: Why don't we  
 10 have Ms. Browne Sanders leave the  
 11 room, and I will tell you exactly  
 12 what the problem is.  
 13 MR. PARCHER: Let's continue.  
 14 MS. VLADECK: It's your  
 15 choice.  
 16 MR. PARCHER: You can tell me  
 17 all you want. You are just coaching  
 18 your witness.  
 19 MS. VLADECK: I'm asking her  
 20 to leave the room. I'm not sure --  
 21 MR. PARCHER: It's too late.  
 22 The horse got out of the barn. Now  
 23 you are saying we'll close the barn  
 24 door.  
 25 A I'm sorry. What was your

405

1 ANUCHA BROWNE SANDERS  
 2 question?  
 3 MR. PARCHER: I don't remember  
 4 it anymore.  
 5 Could you read back my last  
 6 question?  
 7 (Requested portion of record  
 8 read: "Q. These notes are  
 9 inaccurate? You didn't report this  
 10 information, as set forth in that  
 11 paragraph, to Pete Olsen?")  
 12 MS. VLADECK: Object to form.  
 13 A If you are asking me if the  
 14 notes are inaccurate, I interpret these  
 15 notes as being a culmination of some of  
 16 the things that I've said to him. I don't  
 17 think that he's referring to just one  
 18 meeting in this first paragraph.  
 19 Q Did you tell him about more  
 20 than one incident?  
 21 A Yes.  
 22 Q What incidents did you tell  
 23 him about?  
 24 A I told him about a number of  
 25 the incidents that took place in 2004.

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1 ANUCHA BROWNE SANDERS  
 2 incidents, not cursing incidents.  
 3 So far you told us about  
 4 December 29, right?  
 5 A Yes.  
 6 Q And you told us about the  
 7 off-site in January/February, whenever it  
 8 took place, right?  
 9 MS. VLADECK: Objection to the  
 10 form.  
 11 A Yes.  
 12 Q Now you are telling us about  
 13 March 14, correct?  
 14 MS. VLADECK: Objection to  
 15 form.  
 16 A I'm telling you about  
 17 March 14.  
 18 Q Right. Right.  
 19 Are there any incidents that  
 20 were disturbing to you about Isiah between  
 21 March 14, 2005, and your meeting with  
 22 Olsen on May 11, 2005?  
 23 A Between March 14 and May 11?  
 24 Q Yes. I say May 11 because  
 25 that's the date I believe you were in the

423

1 ANUCHA BROWNE SANDERS  
 2 meeting with Pete Olsen.  
 3 A I don't remember right now.  
 4 Q If you don't remember, then  
 5 there's only three incidents to talk  
 6 about, correct?  
 7 MS. VLADECK: Objection to  
 8 form.  
 9 A I said I don't remember right  
 10 now.  
 11 You are asking me between  
 12 March 14 and the meeting -- you said there  
 13 were only three to talk about between  
 14 March 14 and the meeting?  
 15 Q December 29 --  
 16 A You said March 14 and the  
 17 meeting.  
 18 Q That's correct.  
 19 January/February, off-site, and now  
 20 March 14. Those are the three.  
 21 Were there any others?  
 22 A So you mean between December  
 23 and May 11.  
 24 Q Okay. I thought you already  
 25 answered between December and March. But

424

1 ANUCHA BROWNE SANDERS  
 2 okay.  
 3 A Those are the three that I can  
 4 remember right now, yes.  
 5 Q I'm putting the question to  
 6 you.  
 7 Did you tell Mr. Olsen about  
 8 the March 14 incident that you wrote down  
 9 in your diary?  
 10 MS. VLADECK: Objection to  
 11 form. Asked and answered.  
 12 A I don't remember if I told  
 13 him.  
 14 Q So you may not have?  
 15 A I think the substance of our  
 16 conversation was that he repeatedly says  
 17 he's in love with me. I don't recall  
 18 saying, on this date this happened, on  
 19 this date this happened. I told him a  
 20 series of interactions. I said --  
 21 Q You said repeatedly to him  
 22 that he repeatedly told you he loved you?  
 23 A Yes.  
 24 Q Three times is repeatedly.  
 25 MS. VLADECK: Objection to

425

1 ANUCHA BROWNE SANDERS  
 2 form.  
 3 A I told him that he repeatedly  
 4 said he was in love with me.  
 5 Q In a meeting in January or  
 6 February, the so-called off-site planning  
 7 meeting, he didn't tell you he was in love  
 8 with you at that meeting, did he?  
 9 MS. VLADECK: Objection to  
 10 form.  
 11 A Yes, he did.  
 12 Q He did?  
 13 A Yes.  
 14 Q You didn't tell us that  
 15 before, did you?  
 16 A You didn't ask me.  
 17 Q I thought you had --  
 18 Is there anything else about  
 19 that meeting that you didn't tell us  
 20 about?  
 21 MS. VLADECK: Objection to  
 22 form.  
 23 A That was it. He also did as  
 24 well in that meeting, yes.  
 25 Q The man said, "I'm in love



426

1 ANUCHA BROWNE SANDERS  
 2 with you, I want to go off-site with you  
 3 privately?"  
 4 A It was a conversation. I was  
 5 in his office for more than a split  
 6 second. He did say he was in love with me  
 7 in that conversation.  
 8 Q And you told me I didn't ask  
 9 you about it?  
 10 MS. VLADECK: I'm sorry,  
 11 Mr. Parcher. You keep cutting her  
 12 off, and she's mid word.  
 13 Q Go ahead.  
 14 A And he also asked me to go  
 15 off-site with him.  
 16 Q No question that he told you  
 17 he was in love with you?  
 18 A There's no question.  
 19 Q That's the second time he told  
 20 you, right? The first time was  
 21 December 29?  
 22 A He may have said it at other  
 23 times. I'm just trying to remember them.  
 24 Q Right now you don't remember  
 25 them?

427

1 ANUCHA BROWNE SANDERS  
 2 A Right this second, I don't  
 3 remember.  
 4 Q And now, between March 14 and  
 5 May 11, were there any other either  
 6 touching incidents or I love you  
 7 incidents?  
 8 MS. VLADECK: Objection to  
 9 form.  
 10 A There were times and instances  
 11 where he said he loved me, but I don't  
 12 have the times and the dates that he said  
 13 this. But it was consistent.  
 14 Q Consistent.  
 15 How many times did he tell you  
 16 he loved you between March 14 and May 11?  
 17 MS. VLADECK: Objection to  
 18 form. Asked and answered.  
 19 A I didn't count.  
 20 Q More than five?  
 21 A It could have been more than  
 22 five.  
 23 Q More than ten?  
 24 A No, it wasn't more than ten.  
 25 Q Any witness to a single one of

428

1 ANUCHA BROWNE SANDERS  
 2 these times?  
 3 A That he said he was in love  
 4 with me?  
 5 Q Yes.  
 6 A No, not that I am aware of.  
 7 Q Every time he told it to you,  
 8 did you tell Mills?  
 9 A In combination I told Mills.  
 10 Q Anytime other than the three  
 11 instances, the 29th -- the two instances,  
 12 the 29th and the 14th, that you wrote it  
 13 in your diary?  
 14 MS. VLADECK: Objection to  
 15 form.  
 16 A Are you asking me if I wrote  
 17 it in my diary other than those two times?  
 18 Q Yes.  
 19 A I don't know. I don't think  
 20 so. I don't know.  
 21 Q And if I asked you the reasons  
 22 you would give me the same reason,  
 23 sometimes you did and sometimes you  
 24 didn't?  
 25 A Yes.

429

1 ANUCHA BROWNE SANDERS  
 2 Q Was this very upsetting to  
 3 you, the guy was a general manager of the  
 4 New York Knicks walking around telling you  
 5 privately he was in love with you? Was it  
 6 upsetting to you?  
 7 A Yes.  
 8 Q Did you go to Steve Mills and  
 9 tell him to "tell him to cut it out"?  
 10 MS. VLADECK: Objection to  
 11 form.  
 12 A Yes, but not in those words.  
 13 Q What were the words?  
 14 A I told Steve Mills to deal  
 15 with it. I said, "It's ridiculous."  
 16 THE VIDEOGRAPHER: The time is  
 17 6:07 p.m. This ends Tape Number 3 of  
 18 the videotaped deposition of  
 19 Browne Sanders.  
 20 (A brief recess was  
 21 taken.)  
 22 THE VIDEOGRAPHER: The time is  
 23 6:07 p.m. This is Tape Number 4 of  
 24 the videotaped deposition of  
 25 Browne Sanders.

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1 ANUCHA BROWNE SANDERS  
 2 A Yes.  
 3 Q Did you learn something,  
 4 between the time you filed the Complaint  
 5 and the time you amended your Complaint,  
 6 to sue him for aiding and abetting in  
 7 retaliation? That you didn't learn  
 8 through counsel.  
 9 MS. VLADECK: To the extent  
 10 that you learned anything with  
 11 respect to the aiding and abetting or  
 12 facts supporting that through  
 13 counsel, I direct you not to answer.  
 14 If you know anything not  
 15 through counsel, you may answer.  
 16 (Directive to witness.)  
 17 Q I'm waiting for the answer.  
 18 MS. VLADECK: Do you know  
 19 anything other than through counsel?  
 20 A No.  
 21 Q You have no information, from  
 22 any person at the Garden or elsewhere,  
 23 that substantiates your allegation upon  
 24 information and belief that Isiah Thomas  
 25 aided and abetted in retaliating against

451

1 ANUCHA BROWNE SANDERS  
 2 you?  
 3 MS. VLADECK: Two things. I,  
 4 one, object to the form, and second,  
 5 to the extent that you understand  
 6 aiding and abetting and the facts  
 7 supporting that through counsel, I  
 8 direct you not to answer.  
 9 (Directive to witness.)  
 10 Q What's the basis for your  
 11 allegation? What is the basis for your  
 12 allegation that my client aided and  
 13 abetted and retaliated against you?  
 14 MS. VLADECK: I direct her not  
 15 to answer to the extent her only  
 16 understanding of aiding and abetting  
 17 is through counsel.  
 18 (Directive to witness.)  
 19 Q What is the source of your  
 20 information or grounds of your belief that  
 21 he aided and abetted and retaliated  
 22 against you?  
 23 MS. VLADECK: Same direction.  
 24 (Directive to witness.)  
 25 Q When you are quiet, I gather

452

1 ANUCHA BROWNE SANDERS  
 2 that what you're really saying is "I all  
 3 know is through my lawyer, so I can't  
 4 answer that."  
 5 Is that in effect what you are  
 6 saying by being quiet?  
 7 A My attorney is not asking me  
 8 to answer that question.  
 9 Q Unless you know something that  
 10 wasn't told to you by your lawyers. She  
 11 is saying you can't tell me if it was told  
 12 to you by her or Kevin or whomever.  
 13 But do you have any  
 14 information at all that would lead you to  
 15 be able to say that Isiah Thomas had a  
 16 hand in your being fired?  
 17 MS. VLADECK: That's a  
 18 different question.  
 19 A Yes.  
 20 Q Tell me about it.  
 21 A There were a number of things  
 22 that Stephon Marbury said about me. Steve  
 23 mentioned in a number of meetings that  
 24 Isiah did not like me, and that was the  
 25 root of hostility between Stephon and

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1 ANUCHA BROWNE SANDERS  
 2 myself. And that Steve had mentioned in  
 3 one of his meetings that Isiah asked for  
 4 me to be fired.  
 5 Q Steve told you that?  
 6 A Yes.  
 7 Q Was it just you and Steve  
 8 present when he told you that?  
 9 A Yes.  
 10 Q Did you write that down  
 11 anywhere?  
 12 A No.  
 13 Q Did you tell anybody that?  
 14 A Yes, I told somebody. I told  
 15 somebody that.  
 16 Q Who did you tell?  
 17 A I remember telling my sisters.  
 18 Q When did you tell your  
 19 sisters? When did this happen?  
 20 A This was in 2004, the spring.  
 21 Q In 2004?  
 22 A Yes.  
 23 Q He asked for you to be fired?  
 24 A He asked Steve Mills to fire  
 25 me.

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1 ANUCHA BROWNE SANDERS  
 2 Q And you told both your  
 3 sisters, or all three of your sisters?  
 4 A I told my two sisters, Ruthie  
 5 and Vickie.  
 6 Q And anything more? Anything  
 7 more that's the basis for your response?  
 8 A Yeah. Steve mentioned a  
 9 number of times that Isiah doesn't want me  
 10 around.  
 11 Q Doesn't want you to what?  
 12 A Doesn't want me around.  
 13 Steve mentioned that he wanted  
 14 me fired. There was --  
 15 Q That's in '04?  
 16 A That was in 04, yes.  
 17 Q And that he didn't want you  
 18 around was that in '04 or was it '04 and  
 19 '05?  
 20 A The discussions I had with  
 21 Steve with regards to him wanting me fired  
 22 were in spring of -- it was in March and  
 23 April of 2004.  
 24 Q And how about that he doesn't  
 25 want you around, when did that take place?

455

1 ANUCHA BROWNE SANDERS  
 2 A We had had discussions about  
 3 Isiah and more hostile conversations with  
 4 regards to Isiah, and he mentioned that in  
 5 those meetings. Steve did.  
 6 Q When? Time frame.  
 7 A I would say spring and summer  
 8 of 2004.  
 9 Q So anytime in 2005, did he  
 10 tell you that he doesn't want you around?  
 11 MS. VLADECK: Objection to  
 12 form.  
 13 A In 2005 there were -- my basis  
 14 for what -- the question you asked,  
 15 references things that were told to me  
 16 through other people at the Garden.  
 17 Q Tell me who those people were  
 18 and what they told you and when.  
 19 A Dan Gladstone.  
 20 Q Dan Gladstone. What did he  
 21 say to you and when?  
 22 A Dan Gladstone told me that  
 23 Stephon made a number of comments,  
 24 derogatory comments toward me, called me a  
 25 "black bitch."

456

1 ANUCHA BROWNE SANDERS  
 2 Q That Isiah did that?  
 3 A That Stephon, I said.  
 4 Q I am asking about Isiah.  
 5 MS. VLADECK: Please let her  
 6 finish her answer.  
 7 MR. PARCHER: It's not  
 8 responsive. I'm asking about  
 9 Isiah Thomas.  
 10 A When I finish, I'll tell you.  
 11 It's all part of --  
 12 Stephon called me a black  
 13 bitch, said, "We don't take direction from  
 14 a black bitch. She thinks she runs the  
 15 team. She doesn't run shit. I put the  
 16 people in their seats." And then said,  
 17 "We'll see what's going to happen to her  
 18 this year."  
 19 And I told that to Steve. And  
 20 Steve said, "That all comes from Isiah.  
 21 All of that comes from Isiah."  
 22 So that confirmed to me that a  
 23 lot of the root of these issues came  
 24 directly from Isiah.  
 25 Q So why didn't you sue him in

457

1 ANUCHA BROWNE SANDERS  
 2 the first place for aiding and abetting?  
 3 You had that information before the  
 4 Complaint was filed.  
 5 MS. VLADECK: To the extent  
 6 that it calls for attorney/client  
 7 communication, I direct you not to  
 8 answer.  
 9 (Directive to witness.)  
 10 Q Are you making the allegation  
 11 about aiding and abetting on the advice of  
 12 counsel? Is that your position?  
 13 MS. VLADECK: I direct you not  
 14 to answer.  
 15 (Directive to witness.)  
 16 MR. PARCHER: How could you  
 17 direct her not to answer that? You  
 18 answer it.  
 19 Is she making that allegation  
 20 based on your advice?  
 21 MS. VLADECK: You can ask her  
 22 the underlying facts, which you  
 23 started to do, but then cut her off  
 24 mid answer.  
 25 Q Are there any underlying facts

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1 ANUCHA BROWNE SANDERS  
 2 that you haven't told me about that lead,  
 3 in your mind, to the allegation that  
 4 Isiah Thomas aided and abetted in the  
 5 Garden retaliating against you?  
 6 MS. VLADECK: Objection to  
 7 form.  
 8 A The fact that he was extremely  
 9 verbally hostile.  
 10 Q In '04?  
 11 A In '04 --  
 12 Q Not '05, though, right?  
 13 MS. VLADECK: If you are going  
 14 to ask the question, let her answer.  
 15 MR. PARCHER: I'm asking it my  
 16 way. You make your objection.  
 17 Q Not in '05, correct?  
 18 A The fact he was extremely  
 19 hostile to me in 2004, and his profession  
 20 of love for me throughout -- end of 2004  
 21 into 2005, his repeated passes or -- his  
 22 repeated passes, I would say, and my  
 23 insistence that he was being  
 24 unprofessional and certainly didn't  
 25 acknowledge it.

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1 ANUCHA BROWNE SANDERS  
 2 Q Anything else? Tell you what,  
 3 because of time, we'll leave a blank for  
 4 you, and if there's anything else, you can  
 5 put it in there when you see the  
 6 deposition before you sign it. Okay?  
 7 So you are saying all of that,  
 8 and anything else you can remember, is the  
 9 basis for your allegation on information  
 10 and belief that Isiah Thomas aided and  
 11 abetted Madison Square Garden in  
 12 retaliating against you; is that your  
 13 position?  
 14 MS. VLADECK: Objection to  
 15 form.  
 16 A Yes. That's most of it, yes.  
 17 Q What am I missing?  
 18 A Well, you said if I remember  
 19 anything.  
 20 Q You could put it in. Sure.  
 21 You could always do that.  
 22 Then somebody gets to say, why  
 23 didn't you say it then. But you can  
 24 handle that.  
 25 I'll ask you the same question

460

1 ANUCHA BROWNE SANDERS  
 2 without using the words is it under the  
 3 advice of counsel.  
 4 Without using the words  
 5 "aiding and abetting," have you given us  
 6 the whole basis for your saying that  
 7 Isiah Thomas participated in the  
 8 retaliation against you by firing you,  
 9 getting you fired?  
 10 MS. VLADECK: Objection to  
 11 form.  
 12 A The fact that I had a dotted  
 13 line reporting structure to him and --  
 14 Q He was your supervisor?  
 15 MS. VLADECK: Would you please  
 16 let her finish an answer.  
 17 MR. PARCHER: I thought I did.  
 18 Q He was your supervisor?  
 19 A I had a dotted line reporting  
 20 relationship to Isiah.  
 21 Q You say so. Do you have any  
 22 organizational chart that says so?  
 23 MS. VLADECK: Asked and  
 24 answered three times.  
 25 A I don't.

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1 ANUCHA BROWNE SANDERS  
 2 Steve told me that I had a  
 3 dotted line reporting relationship to him,  
 4 as I did with Scott.  
 5 Q Anything else?  
 6 A That's what I can recall now.  
 7 Q You are not saying that  
 8 Isiah Thomas was responsible for reviewing  
 9 your job performance, are you?  
 10 A I don't know that he was  
 11 responsible for reviewing my job  
 12 performance.  
 13 Q You are not saying that  
 14 Isiah Thomas was responsible for  
 15 evaluating you at the end of any given  
 16 period of time, are you?  
 17 MS. VLADECK: Objection to  
 18 form.  
 19 A I think Steve gave me a job  
 20 performance.  
 21 Q You are not saying that  
 22 Isiah Thomas's job was to direct how you  
 23 did your job, was it?  
 24 A Direct, no. Influence, yes.  
 25 Q And he influenced your job by

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1 ANUCHA BROWNE SANDERS  
 2 telling you he wanted you to go through  
 3 Murphy when you talked to the players,  
 4 right?  
 5 MS. VLADECK: Objection to  
 6 form.  
 7 A **He influenced my job in many**  
 8 **ways.**  
 9 Q Okay. Let me ask you this:  
 10 You say that Isiah Thomas damaged you.  
 11 How did he damage you?  
 12 A **He contributed to my getting**  
 13 **-fired.**  
 14 Q Contributed to the  
 15 retaliation, is that what you mean?  
 16 MS. VLADECK: Objection to  
 17 form.  
 18 Q Is that what you mean?  
 19 MS. VLADECK: Objection to  
 20 form.  
 21 MR. PARCHER: I heard you.  
 22 Q Is that what you mean?  
 23 A **Could you repeat the question.**  
 24 Q Is that what you mean, that he  
 25 contributed to your retaliation?

463

1 ANUCHA BROWNE SANDERS  
 2 A **I think he contributed to the**  
 3 **decision to fire me.**  
 4 Q And that's how he damaged you?  
 5 Any other way?  
 6 A **I think that he damaged me,**  
 7 **along with Madison Square Garden, in the**  
 8 **spreading damaging rumors about me.**  
 9 Q What damaging rumors did he  
 10 spread about you?  
 11 A **Things that were in the press.**  
 12 Q He spread rumors about you in  
 13 the press?  
 14 A **Yes.**  
 15 Q What did he say in the press  
 16 that was a rumor?  
 17 A **I don't remember what his**  
 18 **exact quotes were. He had a press**  
 19 **conference.**  
 20 Q You had a press conference,  
 21 didn't you?  
 22 A **Yes, I did.**  
 23 Q You had a press conference at  
 24 the time you filed the Complaint, didn't  
 25 you?

464

1 ANUCHA BROWNE SANDERS  
 2 MS. VLADECK: Objection to  
 3 form.  
 4 A **Yes, I did.**  
 5 Q And if you know, hasn't your  
 6 lawyer spoken to the press a whole bunch  
 7 of times since that time?  
 8 MS. VLADECK: Objection to  
 9 form.  
 10 To the extent you only know  
 11 from counsel, I direct you not  
 12 answer.  
 13 (Directive to witness.)  
 14 Q You read it in the  
 15 paper, didn't you, Kevin Mintzer said this  
 16 and Kevin Mintzer said that?  
 17 MS. VLADECK: Objection to  
 18 form.  
 19 MR. PARCHER: Are you saying  
 20 you didn't do it?  
 21 MR. MINTZER: I said not so  
 22 much.  
 23 Q He said things about you in  
 24 the press?  
 25 A **Yes.**

465

1 ANUCHA BROWNE SANDERS  
 2 Q You can't say specifically  
 3 what they were.  
 4 But anything else?  
 5 A **He's damaged my reputation.**  
 6 Q In any other way other than by  
 7 the ways you just described?  
 8 A **I think he's affected my**  
 9 **ability to get other employment.**  
 10 Q Have you tried to get other  
 11 employment since you left the Garden?  
 12 A **Yes, I have.**  
 13 Q With whom have you tried?  
 14 A **Quite a number of people.**  
 15 Q If I leave a space, will you  
 16 tell me who those people were?  
 17 A **Georgetown University,**  
 18 **Gatorade, Verizon Wireless, TENNIS**  
 19 **Magazine.**  
 20 Q What magazine?  
 21 A **TENNIS.**  
 22 Q Tents?  
 23 MS. VLADECK: TENNIS.  
 24 MR. PARCHER: TENNIS Magazine  
 25 A **TENNIS Magazine.**