

# Exhibit 14

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
06 Civ. 0589 (CGE)

-----x  
ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

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

Defendants.  
-----x

December 12, 2006  
10:08 a.m.

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

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1           MILLS

2     A. Without the specifics of the

3 code of conduct, no.

4     Q. Okay. So, as you sit here now,

5 you don't know?

6     A. Well, I believe that I

7 have -- that I have conducted myself in a

8 way that is appropriate and positive

9 actually in the business that we operate

10 in.

11    Q. But you're not sure whether

12 given -- without looking at the specifics

13 of the policy whether you've acted in

14 accordance with the MSG code of conduct;

15 is that fair to say?

16       MR. GREEN: Objection to form.

17 It has been asked and answered. The

18 witness can answer it again.

19     A. I believe my conduct would be

20 consistent with any code of -- code of

21 conduct.

22     Q. Okay. Based on your

23 understanding of the code of conduct, are

24 you -- do you believe that Isiah Thomas

25 has to your knowledge always acted within

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1           MILLS

2 the MSG code of conduct?

3       MR. GREEN: Objection to form.

4 You may answer if you know.

5     A. Without knowing the specifics of

6 the conduct -- the code of conduct, but I

7 believe Isiah had acted in appropriate

8 ways in our business environment.

9     Q. Okay. But as far as your

10 knowledge of what the code of conduct is

11 sitting here today, your understanding is

12 that Mr. Thomas had conducted himself in

13 accordance with that policy?

14     A. Well --

15       MR. GREEN: Objection to form.

16 The witness has responded with respect to

17 his knowledge of the policy. He can

18 answer fully if he knows.

19     A. If you would like me to look at

20 the specific language of every line in the

21 code of conduct, I'll be more than happy

22 to do that for you.

23     Q. All I am asking is based on what

24 you're understanding is sitting here what

25 you know now, and understanding you have

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1           MILLS

2 not looked at the policy and every line,

3 to your knowledge has Mr. Thomas acted in

4 accordance with the MSG code of conduct?

5     A. Yes.

6     Q. As a supervisor at MSG to you

7 write performance reviews for your people

8 under your supervision?

9     A. It depends on the -- the

10 individual and the job that they are in.

11    Q. Okay. There are -- there are

12 certain people who are in direct reporting

13 relationships to you that you write

14 performance reviews for?

15     A. Yes.

16    Q. And right now, who are the

17 people that you write performance reviews

18 for?

19     A. Mark Piazza, Joel Fischer, Carol

20 Blazejowski, Martie Brooks, and there may

21 be -- there may be a couple of others

22 that -- that I'm not thinking of at

23 this -- this moment.

24    Q. Was that list any different in

25 2005?

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1           MILLS

2     A. Well, in 2005 it would have

3 included Anucha.

4     Q. Okay.

5     A. And Mike Golub.

6     Q. And at that time, Mr. Golub was

7 the SVP of business operations for the

8 Rangers?

9     A. Yes.

10    Q. What -- what is Mr. Fischer's

11 title?

12     A. SVP of sports properties.

13    Q. What do his responsibilities

14 include?

15     A. He oversees all of the non-

16 professional sports that come into -- into

17 The Garden.

18    Q. College basketball being one of

19 them?

20     A. College basketball, boxing,

21 non-professional team sports.

22    Q. Carol Blazejowski is SVP and

23 general manager of The Liberty?

24     A. Yes.

25    Q. And is Martie Brooks the SVP and

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1                   MILLS

2 person in charge of the Hartford Civic

3 Center?

4     A. Yes.

5     Q. Do you do reviews for these

6 individuals on an annual basis?

7     A. Yes.

8     Q. And what time of the year do you

9 do reviews for these individuals?

10    A. We do -- we do them in, you

11 know, following -- somewhere in

12 February -- January, February, March

13 following the -- following -- following

14 our annual -- annual -- you know, our

15 annual year.

16    Q. Your annual year, does that work

17 on -- does MSG work on a calendar year?

18    A. MSG works on a -- MSG

19 corporately works on a calendar year. The

20 teams actually work on a seasonal year.

21    Q. So for the Knicks the basketball

22 season runs I guess preseason October

23 through the end of the season whenever the

24 playoffs end?

25    A. Right, but we evaluate people on

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1                   MILLS

2 a calendar year.

3     Q. From your perspective, what is

4 the purpose of -- of writing performance

5 reviews?

6     A. The purpose is to -- to assess

7 how a person has done in the

8 prior -- prior year, give them feedback on

9 things that they -- they need to approve

10 on and identify any accomplishments that

11 they have had during the course of the

12 year.

13    Q. Okay. Do you try to be accurate

14 when you do the performance reviews?

15    A. Yes.

16    Q. Would you ever knowingly assign

17 someone a rating in a performance review

18 that they didn't deserve?

19    A. No.

20    Q. Could you tell me the

21 circumstances, if you know, of how

22 Ms. Browne-Sanders came to work at MSG?

23    A. Yes. I -- I was looking to

24 fill -- fill the position of vice

25 president of marketing for the Knicks and

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1                   MILLS

2 had spoken to a lot of candidates, and I

3 met Anucha I believe in '96. I believe it

4 was at the -- at the Olympics in -- in

5 Atlanta and had -- you know, was impressed

6 with her at that point. She had come in

7 and met with us with -- doing some work

8 with IBM while I was -- while -- IBM was a

9 sponsor of the Garden, and she had -- had

10 come and worked on some projects, and then

11 I looked at all the candidates to

12 fill -- fill the position as vice

13 president of marketing. She was someone

14 that ultimately I decided -- I thought was

15 the right person for the job.

16    Q. Did you interview her?

17    A. Yes.

18    Q. And what did the two of you

19 discuss in the interview, if you recall?

20    A. Discussed my -- my goals with

21 the Knicks, discussed her experiences at

22 IBM and Kodak, what she was looking for in

23 her next career, what we were looking for

24 or what I particularly was looking for in

25 terms of the role that -- that was open in

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1                   MILLS

2 the Knicks.

3     Q. And particularly with respect to

4 Ms. Browne-Sanders' experience at IBM and

5 Kodak, what was said on that? What did you

6 say and what did she say?

7     A. It -- I don't remember the

8 specifics of what she said. I -- you

9 know, I looked at the marketing background

10 as -- at IBM and the structure of IBM as

11 something that I thought was -- would be

12 good for what I was looking for in the

13 Knicks, at some point better sales

14 experience, and Kodak I thought would be

15 good as we were moving into a sales mode

16 within -- within the Knicks.

17    Q. What were the duties of the

18 position of vice president of marketing

19 that you were considering

20 Ms. Browne-Sanders for?

21    A. Really to oversee the day-to-day

22 operations of the marketing staff, oversee

23 the community relations, oversee the

24 interaction between the Knicks staff and

25 the other departments within The Garden.

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1 MILLS  
 2 Those are generally the responsibilities.  
 3 Q. Okay. I think your previous  
 4 answer may have touched on this, but why  
 5 is it that you hired Ms. Browne-Sanders?  
 6 A. I thought she was -- I thought  
 7 she -- she had a skill set and  
 8 that -- that would -- that was a good fit  
 9 for what I was looking for within the  
 10 Knicks organization.  
 11 Q. And what were you looking for  
 12 within the Knicks organization at that  
 13 point?  
 14 A. I think -- did I answer that?  
 15 Q. Well, I think your answer might  
 16 have alluded to it. If there is anything  
 17 else you want to add to it, that is fine.  
 18 A. I think I -- I think I -- I  
 19 answered that.  
 20 Q. Okay. Were you looking to hire  
 21 someone to reorganize the Knicks  
 22 operations at that point?  
 23 A. I -- I wanted someone to -- to  
 24 add some more structure to the marketing  
 25 department and the activities that took

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1 MILLS  
 2 place in the marketing department.  
 3 Q. What do you mean by structure?  
 4 A. That -- that -- my view of the  
 5 marketing department at that time was that  
 6 it was not the -- the people in the  
 7 department weren't day to day held  
 8 accountable for what they needed to get  
 9 accomplished. There wasn't structurally a  
 10 lot of planning and process to -- to how  
 11 they did things.  
 12 Q. Prior to Ms. Browne-Sanders  
 13 joining the Knicks, who was directly  
 14 responsible for the marketing efforts of  
 15 the Knicks?  
 16 A. A gentleman named [REDACTED].  
 17 Q. How many years did you work with  
 18 Mr. Panis?  
 19 A. Approximately one.  
 20 Q. What was your impression of [REDACTED]  
 21 [REDACTED] performance?  
 22 MR. GREEN: Objection to form.  
 23 You may answer.  
 24 A. I thought -- I thought he  
 25 was -- was very creative but didn't bring

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1 MILLS  
 2 the structure to the organization that I  
 3 was looking for.  
 4 Q. Did you -- [REDACTED] leave the  
 5 organization voluntarily or involuntarily?  
 6 A. You know, I -- I can't remember.  
 7 Q. Did you encourage him to -- to  
 8 leave?  
 9 A. Yes.  
 10 Q. Were you hoping that  
 11 Ms. Browne-Sanders was going to improve  
 12 the professionalism of the -- of the  
 13 marketing organization?  
 14 A. No. I wasn't --  
 15 MR. GREEN: Objection to form.  
 16 You may answer.  
 17 A. I wasn't looking -- I think I  
 18 said that what I was looking for was I  
 19 thought she would add a different level of  
 20 structure to the -- to the marketing  
 21 organization.  
 22 Q. Were you concerned at all about  
 23 any of the employees, how they -- how they  
 24 behaved or how they presented themselves  
 25 at the time that Mrs. Browne-Sanders

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1 MILLS  
 2 were -- was hired?  
 3 MR. GREEN: Objection to form.  
 4 You may answer, Mr. Mills.  
 5 A. No.  
 6 Q. Ms. Browne-Sanders started as a  
 7 vice president of marketing in November of  
 8 2000. Does that sound right to you?  
 9 A. That sounds right.  
 10 Q. Okay. She was in that role  
 11 until she was promoted to senior vice  
 12 president of business operations; is that  
 13 correct?  
 14 A. Yes.  
 15 Q. And who was responsible for  
 16 Ms. Browne-Sanders' promotion to that  
 17 position?  
 18 A. I was.  
 19 Q. Anyone else?  
 20 A. Well, ultimately all promotions  
 21 have to be signed off  
 22 through -- through -- through our human  
 23 resources department, but ultimately I was  
 24 responsible for the promotion.  
 25 Q. Did you consult with anyone

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1 MILLS  
 2 about -- about the promotion other than  
 3 human resources?  
 4 A. I can't remember whether I did.  
 5 Q. Did you speak to Jim Dolan about  
 6 it?  
 7 A. You know, I can't -- I can't  
 8 remember if even Jim was involved day to  
 9 day at the time when -- or if Dave  
 10 Checketts was involved day to day at the  
 11 time of the promotion.  
 12 Q. What year did Mr. Dolan take a  
 13 more active role in The Garden, if you  
 14 remember?  
 15 MR. GREEN: Objection to form.  
 16 You may answer.  
 17 A. It was -- it was -- I can't  
 18 remember the year, but it was -- it was  
 19 after day -- Dave Checketts departure.  
 20 Q. In Ms. Browne-Sanders capacity  
 21 as vice president of marketing, how did  
 22 you regard her performance?  
 23 A. I thought she did a very good  
 24 job.  
 25 Q. And are you able to be any more

55

1 MILLS  
 2 specific about in what respects you  
 3 thought she did a good job?  
 4 MR. GREEN: Objection to form.  
 5 You may answer, Mr. Mills.  
 6 A. I thought she added the  
 7 structure and discipline that I was  
 8 looking for in -- in the department.  
 9 MR. MINTZER: Mark this as  
 10 Mills 3, please.  
 11 (Mills Exhibit 3 marked for  
 12 identification.)  
 13 (Document handed to witness.)  
 14 MR. MINTZER: For the record,  
 15 I've given the witness a -- a document  
 16 that's been marked for identification as  
 17 Mills Exhibit 3. It is Bates stamped MSG  
 18 00350 through 354.  
 19 Q. Mr. Mills, let me know after  
 20 you've had an opportunity to look at it.  
 21 (Pause.)  
 22 A. Okay.  
 23 Q. Are you familiar with this  
 24 document?  
 25 A. Yes.

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1 MILLS  
 2 Q. And this is a performance review  
 3 that you completed for Anucha  
 4 Browne-Sanders on or about January 24,  
 5 2002?  
 6 A. Yes.  
 7 Q. Can I ask you to take a look at  
 8 the page 351. There's a series of  
 9 checkmarks relating to individual  
 10 performance ratings for particular  
 11 categories; is that correct?  
 12 A. Yes.  
 13 Q. Under the category of team work,  
 14 you checked outstanding for  
 15 Ms. Browne-Sanders.  
 16 Did you think that she was  
 17 deserving of that rating?  
 18 A. Yes.  
 19 Q. And why was that?  
 20 A. Because the Knicks have been in  
 21 my opinion a -- what I consider a silo'd  
 22 organization within The Garden and not  
 23 fully integrated into the other operations  
 24 of Madison Square Garden particularly  
 25 well, and one of the things that I wanted

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1 MILLS  
 2 Anucha to do was to find ways to integrate  
 3 the activities of the Knicks more -- more  
 4 completely in -- with the activities of  
 5 other departments and other parts of the  
 6 Garden.  
 7 Q. And how did you -- how did  
 8 Ms. Browne-Sanders, if you know, go about  
 9 integrating the Knicks with other  
 10 departments in The Garden?  
 11 A. I am trying to remember back  
 12 to -- to 2000 -- 2002. I -- you know, I  
 13 really can't remember the specifics, but,  
 14 you know, involved with -- more involved  
 15 with -- with the ticketing operations and  
 16 suite sales operations.  
 17 Q. Okay. Under the -- the third  
 18 category interpersonal competence, you  
 19 checked under outstanding for up and above  
 20 expectations for down. Do you see that?  
 21 A. Yes.  
 22 Q. What did you mean by that?  
 23 A. Throughout Anucha's career, she  
 24 had -- there were always, you know, things  
 25 about her, the way she interacted with

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1 MILLS  
 2 A. There -- there were, you know,  
 3 many people. Our human resources  
 4 department was involved in it. Glen  
 5 Sather was involved in the interview  
 6 process.  
 7 Q. Was Mr. Dolan involved in hiring  
 8 [REDACTED]?  
 9 A. I don't -- Jim -- he never  
 10 interviewed Mike.  
 11 Q. Did Mr. Dolan and Mr. Ratner  
 12 express any concerns about [REDACTED]?  
 13 MR. GREEN: Objection to form.  
 14 You may answer.  
 15 A. Yes.  
 16 Q. What did they say?  
 17 MR. GREEN: Same objection.  
 18 You may answer.  
 19 A. They were -- were concerned  
 20 about whether or not he really grasped all  
 21 -- all of the issues that you needed to be  
 22 successful -- successful in -- in the  
 23 organization especially from a budget  
 24 standpoint.  
 25 Q. Did either one of them express

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1 MILLS  
 2 the view that [REDACTED] should be  
 3 dismissed?  
 4 MR. GREEN: Objection to form.  
 5 You may answer.  
 6 A. No.  
 7 MR. MINTZER: Mark this as  
 8 Mills 4.  
 9 (Mills Exhibit 4 marked for  
 10 identification.)  
 11 (Document handed to witness.)  
 12 Q. For the record, I've given the  
 13 witness a document that is two pages that  
 14 have been marked for identification as  
 15 Mills 4. It is MSG 01946 and 01947.  
 16 (Pause.)  
 17 Q. Mr. Mills, let me know after  
 18 you've had the chance to review it.  
 19 (Pause.)  
 20 A. Okay.  
 21 Q. You've seen Mills 4 before?  
 22 A. Yes.  
 23 Q. This is the announcement that  
 24 you sent out concerning  
 25 Ms. Browne-Sanders' promotion to senior

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1 MILLS  
 2 vice president marketing business  
 3 operations?  
 4 A. Yes.  
 5 Q. Is everything that you stated in  
 6 this document true to your -- to your  
 7 information and belief?  
 8 A. Yes.  
 9 Q. When you said in the second  
 10 paragraph of the document that she has  
 11 also played a key role in the  
 12 reorganization of the entire front office  
 13 staff of the New York Knicks, what were  
 14 you referring to?  
 15 A. I can't remember the specifics  
 16 back to 2002 what the  
 17 reorganizational -- reorganizational  
 18 changes would have been at that point, but  
 19 it -- the -- I just can't remember the  
 20 specifics.  
 21 Q. You said that the SVP of  
 22 marketing business operations was a  
 23 position that you created in -- at the  
 24 time of a reorganization. Is that -- is  
 25 that accurate?

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1 MILLS  
 2 A. Yes.  
 3 Q. Who held the marketing and  
 4 business operations responsibilities prior  
 5 to Ms. Browne-Sanders' assuming the role,  
 6 even if it was a different position?  
 7 A. I -- you know, I don't -- it  
 8 was -- it was more of an elevation of  
 9 the -- it was more of a -- of a move in  
 10 her position because I was moving over to  
 11 be responsible for the business operations  
 12 for -- for both the Knicks and the  
 13 Rangers. So she was going to be  
 14 more -- you know, she was going to be more  
 15 active in the management of -- of the  
 16 business operations of the Knicks and  
 17 Rangers primarily because I was going to  
 18 be split between multiple teams at this  
 19 point.  
 20 Q. What had your job been prior to  
 21 2002?  
 22 A. Executive vice president of  
 23 business operations or sports team  
 24 operations for the Knicks.  
 25 Q. For the Knicks. And

<p style="text-align: right;">86</p> <p>1 MILLS</p> <p>2 what -- what were your responsibilities at</p> <p>3 that point?</p> <p>4 A. To really, you know, oversee the</p> <p>5 entire business operations for the Knicks,</p> <p>6 the -- the responsibility for all of the</p> <p>7 staffing to integrate with our basketball</p> <p>8 operations department, but I was -- I was</p> <p>9 the chief business person responsible for</p> <p>10 the Knicks.</p> <p>11 Q. How did the job that you held</p> <p>12 prior to 2002 differ from the job that</p> <p>13 Ms. Browne-Sanders was taking as reflected</p> <p>14 in Mills Exhibit 4, if at all?</p> <p>15 A. It was not -- it was not -- it</p> <p>16 was not of the level of the job that I</p> <p>17 held.</p> <p>18 Q. And I'm asking you what -- what</p> <p>19 were the differences.</p> <p>20 A. The difference is that still</p> <p>21 ultimately I was still responsible. I was</p> <p>22 still the chief business person</p> <p>23 responsible for the ultimate business</p> <p>24 operations for this team. It is just that</p> <p>25 I -- I took on also the responsibilities</p>	<p style="text-align: right;">88</p> <p>1 MILLS</p> <p>2 MR. MINTZER: For the record,</p> <p>3 I've given the witness a document that is</p> <p>4 marked as -- for identification as Mills</p> <p>5 Exhibit 5 and previously also marked at</p> <p>6 Ms. Browne-Sanders' deposition at BS X.</p> <p>7 It is a multi-page document that is Bates</p> <p>8 stamped MSG 1879 through 1885.</p> <p>9 Q. Mr. Mills, why don't you take a</p> <p>10 look at the document and let me know when</p> <p>11 you've had an opportunity to do that.</p> <p>12 (Pause.)</p> <p>13 A. Okay.</p> <p>14 Q. Are you familiar with the</p> <p>15 document, Mills Exhibit 5? Have you seen</p> <p>16 it before?</p> <p>17 A. I mean I -- I think -- I saw it</p> <p>18 obviously when it was drafted.</p> <p>19 Q. All right. Did you draft it and</p> <p>20 specifically with reference to the</p> <p>21 document that begins on page 1881?</p> <p>22 A. I -- I at least was, you know,</p> <p>23 involved in the drafting of it.</p> <p>24 Q. Who else was involved in the</p> <p>25 drafting of it?</p>
<p style="text-align: right;">87</p> <p>1 MILLS</p> <p>2 of the business operations for another</p> <p>3 team, the Rangers.</p> <p>4 Q. Who did you report to in the</p> <p>5 position where you were the chief business</p> <p>6 person for the Knicks prior to 2002?</p> <p>7 A. I reported to -- again, I can't</p> <p>8 remember the specifics as to when Jim</p> <p>9 became involved, but I reported to Dave</p> <p>10 Checketts, and then I reported to Jim</p> <p>11 Dolan, but I can't remember what</p> <p>12 specifically -- specifically what years</p> <p>13 those were.</p> <p>14 Q. Other than --</p> <p>15 MR. MINTZER: Strike that.</p> <p>16 Q. Did you do a position</p> <p>17 description for Ms. Browne-Sanders' role</p> <p>18 as senior vice president of marketing</p> <p>19 business operations?</p> <p>20 A. I can't remember if I did or</p> <p>21 not.</p> <p>22 Q. Okay.</p> <p>23 (Mills Exhibit 5 marked for</p> <p>24 identification.)</p> <p>25 (Document handed to witness.)</p>	<p style="text-align: right;">89</p> <p>1 MILLS</p> <p>2 A. Normally I would involve our</p> <p>3 finance -- one of our finance people and</p> <p>4 someone from human resources in the</p> <p>5 drafting of it.</p> <p>6 Q. Does the document that begins on</p> <p>7 page 1881 accurately describe the position</p> <p>8 of senior vice president of business</p> <p>9 operations that Ms. Browne-Sanders held</p> <p>10 beginning in March of 2002?</p> <p>11 A. Yes.</p> <p>12 Q. Did the position have any --</p> <p>13 MR. MINTZER: Strike that.</p> <p>14 Q. Are you familiar with the phrase</p> <p>15 "dotted line reporting relationship"?</p> <p>16 A. Yes.</p> <p>17 Q. Did the SVP of business</p> <p>18 operations position have any dotted line</p> <p>19 reporting relations?</p> <p>20 MR. GREEN: If know, Mr. Mills.</p> <p>21 A. I'm not sure.</p> <p>22 Q. Did you ever tell</p> <p>23 Ms. Browne-Sanders that she had a dotted</p> <p>24 line reporting relationship to anyone?</p> <p>25 A. No.</p>



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1 MILLS  
 2 aggressive over the course of the meeting  
 3 and -- and never at any point just said  
 4 okay. I am glad this is the way -- this  
 5 is the way it worked out.  
 6 Q. What did Mr. --  
 7 Ms. Browne-Sanders say to that?  
 8 A. She, you know, said it was just  
 9 important for her that Isiah understands  
 10 that, you know, he has his role, and she  
 11 has her role, that she felt very strongly  
 12 about it, and I just reiterated that I  
 13 thought she was overly aggressive in  
 14 how -- in how she responded to a situation  
 15 that I thought worked out the way she  
 16 wanted it to work out.  
 17 Q. What did she say in the meeting  
 18 with you, her and Mr. Thomas that you  
 19 found to be overly aggressive?  
 20 A. She was very, very forceful, and  
 21 I just want to make sure you understand  
 22 that I am responsible for X. I want to  
 23 make sure you understand that I am  
 24 responsible for Y. I want to make sure  
 25 you understand that I am responsible for

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1 MILLS  
 2 the on court experience, that tone in --  
 3 as we sort of discussed the issues that  
 4 were gray in Isiah's mind before he walked  
 5 in the door.  
 6 Q. Did it seem that  
 7 Ms. Browne-Sanders was agitated?  
 8 A. Yeah. I said she -- she -- it  
 9 seemed like she was clearly upset in  
 10 calling for the meeting because I -- there  
 11 was a misunderstanding, and she was  
 12 concerned that maybe her job  
 13 responsibilities had changed. So that was  
 14 clearly important for her to come into  
 15 this meeting and have it reaffirmed, the  
 16 scope of her job and to affirm the scope  
 17 of Isiah's job.  
 18 Q. At any point did Mr. Thomas  
 19 complain to you about Ms. Browne-Sanders?  
 20 MR. GREEN: Objection to form.  
 21 Any time frame?  
 22 MR. MINTZER: Any time. Was  
 23 that -- was that the only basis of the  
 24 objection.  
 25 MR. GREEN: Yes.

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1 MILLS  
 2 Q. So we clarified that. At any  
 3 point.  
 4 A. He -- he complained that, you  
 5 know -- that there -- there were times  
 6 when it appeared that he was being, you  
 7 know -- that there were certain things  
 8 that he didn't want to be involved in that  
 9 Anucha was -- was outlining or requesting  
 10 that he be involved in. He made it clear  
 11 to me that he did not want to be a person  
 12 who was out selling season tickets. He  
 13 didn't want to be a guy who in -- sending  
 14 letters to season ticket holders asking  
 15 them to please renew their tickets  
 16 sincerely Isiah Thomas. He -- and it  
 17 seemed that Anucha wanted to include him  
 18 in things like that -- that -- that  
 19 troubled him. He said -- he was always  
 20 clear I want to do whatever I can do to  
 21 support the organization, but I don't -- I  
 22 don't want to be in the business of -- of  
 23 selling tickets, and he told me that, you  
 24 know, that's something Willis Reid has  
 25 shared with him in -- when he came in and

201

1 MILLS  
 2 was working with Anucha and -- and Scott  
 3 Laden. He said that if you're not careful  
 4 in the organization they will turn you  
 5 into a pitch man to sell tickets, and you  
 6 have to find a way to stay focused on  
 7 basketball and -- and so that was -- that  
 8 was a complaint of his. He said he would  
 9 be more than happy to make sure that  
 10 whenever we needed him to tell -- to  
 11 communicate to people about what was going  
 12 on with the team, how we're building the  
 13 team, what our expectations about the team  
 14 were, he would be more than happy to  
 15 participate in that and use that to  
 16 support our -- our business, but he didn't  
 17 want to be in the business of sort of  
 18 being a salesperson.  
 19 Q. Mr. Thomas' comment about Willis  
 20 Reid, would -- and correct me if I am  
 21 wrong, I want to make sure I understand  
 22 this right. Was he saying that  
 23 Ms. Browne-Sanders had made according to  
 24 Mr. Reid Mr. Reid into a -- you know, a  
 25 salesperson or a pitch man?

202

1           MILLS  
2       A. Well, he -- what -- what  
3 he -- what he said to me was that Willis  
4 had a conversation with him saying that  
5 you have to be careful about how you allow  
6 the -- the people within the organization  
7 to turn you into a salesman, salesman or a  
8 pitch man, and that you -- if you  
9 don't -- if you're not careful about it  
10 and not focused on what you believe the  
11 core sort of functions and expertise you  
12 have that you'll -- you'll become  
13 distracted, and that was --  
14       Q. Did Mr. Thomas tell you that Mr.  
15 Reid had said to him anything about  
16 -Ms. -- Ms. Browne-Sanders?  
17       A. No, he didn't say  
18 anything -- anything specifically about  
19 Ms. Browne-Sanders.  
20       Q. Have you ever spoken to Mr. Reid  
21 about Ms. Browne-Sanders?  
22       A. I can't remember if I've had any  
23 conversation with Willis about -- about  
24 Anucha.  
25       Q. I take it then you -- you don't

203

1           MILLS  
2 know whether Mr. Reid ever had any  
3 complaints about Ms. Browne-Sanders?  
4       A. You know, I don't know that he  
5 and I had any conversations about Anucha.  
6       Q. Other than the conversations  
7 that you say that you had with Mr. Thomas  
8 in which he made it clear that he didn't  
9 want to be I think your words were the  
10 pitch man or salesman for the  
11 organization, did he have any other  
12 comments that he made about  
13 Ms. Browne-Sanders, you know, relating to  
14 her job performance or her -- her role in  
15 the organization?  
16       A. Well, I want -- I want to also  
17 clarify that my -- my comments regarding a  
18 salesman or a pitch -- pitch person really  
19 was focused on the selling of tickets.  
20 Isiah was always more than willing if  
21 there were things like helping to sell  
22 suites and things that were really big  
23 items or important things that -- to  
24 closing business in the organization, he  
25 would -- he would participate in those.

204

1           MILLS  
2       Q. Okay. We will -- that --  
3       A. Okay. Then can you repeat the  
4 question?  
5       Q. The clarification that you made  
6 and then my question is other than that,  
7 did Mr. Thomas ever express any other  
8 views about Ms. Browne-Sanders' job  
9 performance or her role in the  
10 organization or anything along those  
11 lines?  
12       A. He didn't have -- he didn't have  
13 any say in her job performance so -- and  
14 her role in the organization was defined  
15 by me, not by him. So he -- you know,  
16 we -- there may have been some other  
17 comments or discussions that we had, but  
18 I -- I can't remember -- remember them at  
19 the time.  
20       Q. Okay. Did he ever tell you that  
21 he thought that Ms. Browne-Sanders should  
22 be replaced in her role?  
23       A. No.  
24       Q. Did he ever tell you that  
25 Ms. Browne-Sanders should be fired?

205

1           MILLS  
2       A. No, nor would I have -- again,  
3 it wasn't -- he wasn't in a place to make  
4 a decision on whether or not she should be  
5 replaced nor whether she should be fired  
6 so, but he didn't have those conversations  
7 with me.  
8       Q. As president of basketball  
9 operations he was -- he could have if he  
10 wanted to offered an opinion about that,  
11 correct?  
12       A. He could offer an opinion about  
13 many things, but he is not in the position  
14 to -- to control those things.  
15       Q. How was, if you know,  
16 Ms. Browne-Sanders' relationship with  
17 Scott Laden?  
18       A. It -- they had a very good  
19 relationship.  
20       Q. And how do you know that?  
21       A. I had conversations with Scott  
22 about -- I had meetings with Scott and  
23 Anucha, conversation with Anucha regarding  
24 her involvement in the basketball  
25 operations role. They had -- they had a

282

1 MILLS  
 2 that you had some communication with Rusty  
 3 McCormack about Ms. -- Ms. Browne-Sanders'  
 4 dismissal. Do you recall that?  
 5 MR. GREEN: Objection to form.  
 6 If you recall your prior testimony, you  
 7 may respond.  
 8 Q. Again, there is no game  
 9 here -- I will reask the question. I  
 10 didn't want to do an asked and answered,  
 11 so --  
 12 MR. GREEN: It will make it  
 13 easier.  
 14 Q. Did you have any discussions  
 15 with Mr. McCormack about  
 16 Ms. Browne-Sanders being dismissed?  
 17 A. The conversation that I had that  
 18 I think I had with Russ -- Rusty McCormack  
 19 really was a function of Anucha coming to  
 20 me saying that she couldn't do this job  
 21 any more, me agreeing, and her asking me  
 22 that I need to -- your help, and I need to  
 23 have this -- a job while I go out and find  
 24 another -- until -- while I go out and  
 25 find another one. I had a conversation

283

1 MILLS  
 2 with Hank about that, and I had already  
 3 known that Hank was not a fan of Anucha's,  
 4 and I had the conversation with him. He  
 5 said you should get to Rusty, so that we  
 6 can figure out a way -- how to accomodate  
 7 this and accomodate her, and so I had a  
 8 conversation with Rusty.  
 9 Q. And what was your conversation  
 10 with Mr. McCormack; what did you say and  
 11 what did he say?  
 12 A. I said that Anucha came to me  
 13 and said she couldn't do this,  
 14 couldn't -- couldn't do this any more.  
 15 She -- I recounted that she had lost the  
 16 confidence of the people that -- that  
 17 worked for her and that she wanted -- she  
 18 couldn't do it, and I agreed, and that she  
 19 needed to -- to have a job while she went  
 20 out and -- and looked for another job, and  
 21 I spoke to Hank, and I -- and -- you know,  
 22 we should start working on a -- a plan.  
 23 Q. Right. I think I understood  
 24 that, but I was asking you about your  
 25 conversation with -- were you just

284

1 MILLS  
 2 testifying now as to your conversation  
 3 with Mr. McCormack?  
 4 A. Yes.  
 5 Q. Okay. In your -- in your  
 6 conversation with Mr. McCormack, you told  
 7 him about the conversation you had with  
 8 Ms. Browne-Sanders. You recounted for him  
 9 that you had the conversation with Mr.  
 10 Ratner, correct?  
 11 A. Yes.  
 12 Q. Okay. And then did Mr.  
 13 McCormack say anything in this  
 14 conversation?  
 15 A. He said okay I'll -- I'll work  
 16 on it.  
 17 Q. Did he tell you what he was  
 18 going to work on?  
 19 A. We didn't talk about what the  
 20 specifics of what he was going to work on.  
 21 Q. Did you have an understanding of  
 22 what -- what he was going to work on?  
 23 A. I told him that I wanted some  
 24 kind of transition plan and some kind  
 25 of -- that we had to develop some kind of

285

1 MILLS  
 2 package for her that would put her in a  
 3 position to -- to move on.  
 4 Q. When did you have this  
 5 discussion with Mr. McCormack?  
 6 A. It was -- it was sometime  
 7 in -- sometime in -- in late November.  
 8 Q. Did Mr. McCormack ever follow-up  
 9 with you about what kind of transition  
 10 plan he was putting together?  
 11 A. No, I think it was -- you know,  
 12 there was -- it was soon after that that  
 13 we -- we were contacted by -- by Anucha's  
 14 attorneys.  
 15 Q. When you say soon after, do you  
 16 know how long after?  
 17 A. I really -- I really don't.  
 18 Q. Was it several weeks?  
 19 A. I really can't remember.  
 20 Q. Okay. But whatever that time  
 21 period was, you never got any follow-up  
 22 from Mr. McCormack about what he was doing  
 23 to implement the transition plan?  
 24 A. No.  
 25 Q. Did you ever see any document

286

1 MILLS  
2 that reflected anything about a transition  
3 plan?  
4 A. No, we hadn't -- I -- I did not  
5 see anything.  
6 Q. Did you document your  
7 conversation with Mr. --  
8 Ms. Browne-Sanders in which you say that  
9 she said she couldn't do her job any more?  
10 A. No.  
11 Q. Did you document your  
12 conversation with Mr. Ratner?  
13 A. No.  
14 Q. And are you aware other than  
15 what you've learned from counsel of any  
16 document that exists that reflects any of  
17 the conversations that you've just  
18 mentioned?  
19 MR. GREEN: Objection to form.  
20 You may answer.  
21 A. Not that -- no.  
22 Q. Did you ever have a follow-up  
23 with Ms. Browne-Sanders during the period  
24 between your -- when you say she had told  
25 you that she couldn't do her job and when

287

1 MILLS  
2 she left the organization about  
3 what -- what was being done to implement  
4 the transition plan that you had in mind?  
5 A. No, I just told her that I  
6 would -- that I would -- that when -- when  
7 she initially had the conversation, I told  
8 her that I would -- that I understood, and  
9 I would -- would accommodate her.  
10 Q. Right. And you -- you never  
11 followed up with her again on that?  
12 A. We never had a chance to have  
13 another conversation about that.  
14 Q. You said you never had a chance  
15 to. What do you mean?  
16 MR. GREEN: Objection.  
17 Q. Did you not see  
18 Ms. Browne-Sanders after that time?  
19 MR. GREEN: Objection to form.  
20 You may answer, Mr. Mills.  
21 A. It was soon after that that we  
22 were -- that we were contacted by -- by  
23 the lawyers, and this was in the hands of  
24 the lawyers.  
25 Q. All right. And so is it

288

1 MILLS  
2 your -- is it your testimony, did  
3 you -- did you --  
4 MR. MINTZER: Strike that.  
5 Q. Did you see Ms. Browne-Sanders  
6 at any point between the time that you had  
7 the conversation with her in which she  
8 supposedly told you that she couldn't do  
9 her job any more and when you learned that  
10 her lawyers had contacted MSG?  
11 A. You know, I am -- I am sure I  
12 saw her. I can't remember -- I can't  
13 remember the specific times that I did.  
14 Q. You are sure you did see her  
15 during that period?  
16 A. I would think that I would have  
17 seen her, but I can't remember a specific  
18 instance because I can't -- I don't have  
19 the specific times.  
20 Q. Do you know how many times that  
21 you saw her --  
22 MR. GREEN: Objection.  
23 Q. -- during that period?  
24 A. No, I don't.  
25 Q. Do you think it was more than

289

1 MILLS  
2 five?  
3 A. I don't.  
4 Q. You don't know whether it was  
5 more than five. It could have been?  
6 A. I don't -- I don't know.  
7 Q. Could it have been more than  
8 fifteen?  
9 A. I -- I don't know.  
10 Q. Could it have been more than a  
11 hundred times that you saw her?  
12 MR. GREEN: Objection. At this  
13 point this is harassment. The record will  
14 speak for itself. I would like this  
15 marked. Thank you.  
16 MR. MINTZER: I want to make it  
17 clear -- let me make sure the record is  
18 clear. You are directing the witness not  
19 to whether he could have seen  
20 Ms. Browne-Sanders during the period when  
21 she supposedly said she couldn't do her  
22 job any more to when her lawyers contacted  
23 The Garden, it could have been more than a  
24 hundred times? You are unable to answer  
25 that?

346

1 MILLS  
 2 Q. Ms. Browne-Sanders didn't  
 3 discuss during that conversation that she  
 4 had the P and L responsibilities for the  
 5 team?  
 6 A. In that discussion we talked  
 7 about what -- what the basketball  
 8 operations responsibilities would be and  
 9 what the business operations  
 10 responsibilities were.  
 11 Q. Did anyone ever tell you of  
 12 a -- a rumor that Ms. Browne-Sanders and  
 13 Jeff Nix were having an affair?  
 14 MR. GREEN: Objection to form.  
 15 You may answer, Mr. Mills.  
 16 A. Yes.  
 17 Q. Who told you that?  
 18 A. Anucha told me.  
 19 Q. Anyone else other than  
 20 Ms. Browne-Sanders?  
 21 A. Not that -- no.  
 22 Q. Did [REDACTED] ever tell you  
 23 that?  
 24 A. Anucha told me -- as a matter of  
 25 fact, Anucha told me that -- came to me

347

1 MILLS  
 2 and said that she heard that [REDACTED]  
 3 had spoken to people in the ad sales  
 4 department and said that she  
 5 wanted -- that she was having an affair  
 6 with Jeff Nix, and she told me she wanted  
 7 to fire [REDACTED]. I told her that I'm not  
 8 sure -- I said [REDACTED] can't go around  
 9 saying things like that about you. I'm  
 10 really not sure whether or not you can  
 11 fire him about something like that. I  
 12 think you should go talk to the human  
 13 resources department to find out what you  
 14 are able to do when a -- an employee does  
 15 something like that, and then clearly you  
 16 should have a conversation with him.  
 17 Ultimately, she didn't terminate [REDACTED],  
 18 but she -- she did tell me she had -- she  
 19 had a conversation with [REDACTED] and told him  
 20 that she didn't appreciate those -- those  
 21 remarks and that he shouldn't go around  
 22 saying things like that.  
 23 Q. When was your conversation with  
 24 Ms. Browne-Sanders about this?  
 25 A. I -- I can't remember when it

348

1 MILLS  
 2 was. Obviously it was at some point while  
 3 [REDACTED] was still employed by the  
 4 Knicks.  
 5 Q. When did he leave?  
 6 A. I'm not sure of the dates of his  
 7 departure.  
 8 Q. Well, do you -- do you know what  
 9 year it was?  
 10 A. I really don't. I can't  
 11 remember.  
 12 Q. Other than that conversation  
 13 with Ms. Browne-Sanders, did you ever have  
 14 any other discussion with anyone about a  
 15 rumor that Ms. Browne-Sanders was having  
 16 an affair with Jeff Nix?  
 17 A. No.  
 18 MR. GREEN: Objection to form.  
 19 You may answer.  
 20 A. No.  
 21 Q. Did Ms. Browne-Sanders receive a  
 22 raise in 2005?  
 23 A. In what -- what part of 2000 --  
 24 you know --  
 25 Q. Any part of 2005.

349

1 MILLS  
 2 A. I -- I don't -- I'm not sure if  
 3 she received a raise in 2005. I  
 4 don't -- I don't believe so.  
 5 (Mills Exhibit 15 marked for  
 6 identification.)  
 7 (Document handed to witness.)  
 8 MR. MINTZER: For the record,  
 9 Mills 15 for identification is a one-page  
 10 document, MSG 08877.  
 11 (Pause.)  
 12 Q. Have you finished looking at it,  
 13 sir?  
 14 A. Yes.  
 15 Q. This is an E mail that -- one of  
 16 the E mails in the document, the second E  
 17 mail is from John Cudmore to Lynn Carfora  
 18 in which among other people you are copied  
 19 on.  
 20 Do you see that March 15, 2005?  
 21 A. Yes.  
 22 Q. Does this refresh your  
 23 recollection as to whether  
 24 Ms. Browne-Sanders received a raise in  
 25 March of 2005?

350

1           MILLS

2     A. Well, it is clear -- in this

3 document there -- there was a raise.

4     Q. And does it refresh your

5 recollection that the raise occurred in

6 2005?

7     A. Yes.

8     Q. And did you approve the raise to

9 Ms. Browne-Sanders?

10    A. The -- the raise -- yes, I would

11 have had to approve the raise.

12    Q. Do you know what the size of the

13 raise was that Ms. Browne-Sanders

14 received?

15    A. No, I don't know the specific

16 size of the raise.

17    Q. Do you have any sense of whether

18 it was, you know, in the scheme of things

19 a large raise or an average raise or a

20 small raise or something else?

21           MR. GREEN: Objection to form.

22 You may answer -- answer, Mr. Mills.

23    A. I really, really -- I don't

24 remember the specifics of the raise.

25    Q. What are customary raises for

352

1           MILLS

2 remember the specifics of this document,

3 so -- so I can't remember the specifics

4 about the raise.

5           THE WITNESS: Can we take a

6 break for a second.

7           MR. GREEN: Sure.

8           THE VIDEOGRAPHER: We are off

9 the record. The time is 5:32.

10           (Recess taken.)

11           THE VIDEOGRAPHER: Okay. We

12 are back on the record. The time is 5:36.

13 BY MR. MINTZER:

14    Q. Were there any positive aspects

15 of Ms. Browne-Sanders' job performance in

16 2005?

17    A. I am sure there were -- there

18 were -- there was -- there were some

19 accomplishments in 2005, but 2005

20 generally was a -- was a point in time

21 where it was a -- a disastrous year for

22 Anucha on -- on -- on many fronts. It

23 started with issues that -- that related

24 to the -- the budget -- the budget process

25 and -- and as -- as we were planning

351

1           MILLS

2 executive -- executives at MSG in terms of

3 percentages?

4     A. It -- it varies depending on the

5 business and the -- and the year and what

6 the approved guidelines are by -- by our

7 human resource department.

8     Q. All right.

9         So in 2005, what is your

10 recollection of what the guidelines were

11 for raises?

12    A. I don't -- I don't recall.

13    Q. In the last couple of years or

14 in the last few years, what is the range

15 of -- of -- of the guidelines for raises

16 for executives at MSG?

17           MR. GREEN: Objection to form.

18 You may answer, Mr. Mills.

19    A. In the 4 -- 4 percent to 6

20 percent raise range.

21    Q. Do you know the reason why

22 Ms. Browne-Sanders was getting a raise at

23 this time as reflected in Mills 15?

24    A. You know, I'm

25 not -- I'm -- I -- I don't -- I don't

353

1           MILLS

2 with -- with the budgeting process there

3 were -- she didn't perform well and -- in

4 the meetings that we had. We had

5 discussions with Jim and Hank about, you

6 know, Hank already was not confident that

7 she could -- she could perform in this

8 job, and he -- he was, you know, feeling

9 that she definitely couldn't make it and

10 in some ways thought that -- that we

11 should -- we should terminate Anucha in

12 2005. Jim agreed that we should continue

13 to do some training and -- and try

14 to -- try to bring her along. I had

15 demonstrated before that I wanted -- that

16 I wanted to try and bring Anucha along,

17 and I had been a big proponent of her in

18 her time at The Garden, but it was during

19 that time that we -- we agreed to provide

20 some training and tried to help -- help

21 her through the process, but even with me

22 she had come to a point where we tried to

23 develop the programs that she would do

24 that she was sort of resistant to -- to

25 the specifics of the programs that -- that

374

1           MILLS

2       A. Well, initially she said to me

3 that Mr. Dolan's ideas of what -- what the

4 brand statement -- what things should be

5 in the brand statement she didn't believe

6 were correct, that she didn't believe he

7 understood what the -- what should be in

8 the brand statement, what should be in

9 brand attributes, and I told her, you

10 know, what -- what we are trying to do is

11 articulate and communicate the brand of

12 the Knicks in -- in a way that Jim

13 understands and that Jim and Hank and the

14 senior management team can -- can use and

15 work with the group in terms of how we are

16 going to build down through the pyramid.

17       After we got through that

18 conversation, she acknowledged that she

19 accepted that it was in -- that -- that it

20 was in her best interests and I thought it

21 was very important that she find a way to

22 take these courses, and at that point we

23 decided -- we started working with Pete

24 on -- I asked Pete to -- to meet with

25 Anucha and recommend a series of courses

376

1           MILLS

2 said to Pete, you know, these are the

3 choices that she has. Let's just find

4 some classes that fit within the timing of

5 getting this done relatively quickly.

6       Q. Did you have any discussion with

7 Mr. Olsen about the background for why you

8 were asking him to do this?

9       A. I believe I told him it was a --

10 it was at the request of Jim and that what

11 it was -- what -- what -- what led to us

12 having the courses. I am sure I did.

13       Q. What -- and a part of telling

14 him what led to the courses was telling

15 him about Mr. Dolan and Mr. Ratner's

16 dissatisfaction with her performance at

17 the budget meetings?

18       A. That we had -- that we had a bad

19 budget meeting and that things didn't go

20 well, and part of the problem was that how

21 we were trying to develop the

22 brand -- brand statements and -- and brand

23 statements and mission statements. I

24 don't -- I don't think I said

25 to -- to -- to Pete that -- anything

375

1           MILLS

2 or some number of courses that she could

3 choose from that that we would -- that

4 this would take.

5       Q. Did you ever tell her in these

6 conversations that her job was potentially

7 in jeopardy?

8       A. No.

9       Q. Did you ever tell her any of the

10 things that Mr. Dolan or Mr. Ratner had

11 said about her in those meetings?

12       A. No.

13       Q. Did you have any discussions

14 with Pete Olsen about the class that Mrs.

15 Browne-Sanders would eventually take?

16       A. Initially Pete and I had

17 conversations about what -- what

18 the -- what the -- what we were going to

19 try and get accomplished with the class

20 and to outline some classes and, you know,

21 he spoke to -- he spoke to Anucha about

22 it, and initially some of the classes that

23 we had selected she didn't want to take

24 and thought they weren't appropriate,

25 weren't the right courses, and finally I

377

1           MILLS

2 about, you know, the conversations we had

3 about her job performance,

4 her -- her -- the views on whether she

5 would make it or anything like that.

6       Q. Do you know what class

7 Ms. Browne-Sanders ultimately took?

8       A. Off -- I -- I can't remember

9 which -- which course it actually was.

10       Q. Do you know what the topic area

11 of the course was that she took?

12       A. I can't -- at this point I

13 can't -- at this time I can't remember.

14       Q. Do you know did it have anything

15 to do with the budgeting process?

16       A. I can't remember which courses

17 she -- she ultimately took.

18       Q. Do you think she took more than

19 one course?

20       A. I think she took one course, but

21 I'm not -- not sure if there was more than

22 one.

23       Q. Did you ever have any follow-up

24 conversation with Mr. Dolan or Mr. Ratner

25 about the training that Mrs.

414

1 MILLS  
 2 is to make player transactions. So Isiah  
 3 Thomas has made numerous player  
 4 transaction -- transactions in order to  
 5 improve the quality of our team.  
 6 Q. Did you meet with John Moran and  
 7 Rochelle Noel to discuss  
 8 Ms. Browne-Sanders' allegations concerning  
 9 sexual harassment?  
 10 A. John -- John and Rochelle were  
 11 conducting an investigation into her  
 12 allegations, and I was interviewed as part  
 13 that much process. Right.  
 14 Q. Were you interviewed twice?  
 15 A. It -- I can't remember if I was  
 16 interviewed more than once or twice.  
 17 Q. You don't remember one interview  
 18 where in -- in the latter part of December  
 19 and then another interview in early  
 20 January?  
 21 A. I remember -- I remember being  
 22 interviewed. I don't remember the  
 23 number -- the number of interviews.  
 24 Q. Did you --  
 25 MR. MINTZER: Strike that.

415

1 MILLS  
 2 Q. In your conversations with Mr.  
 3 Cudmore, did you mention to him that  
 4 Ms. Browne-Sanders had said that she was  
 5 no longer able to do her job?  
 6 A. No.  
 7 Q. Did you tell the -- the  
 8 investigators who were looking into  
 9 Ms. Browne-Sanders' allegations, Mr. Moran  
 10 and Ms. Noel, that Ms. Browne-Sanders had  
 11 said that she was no longer able to do her  
 12 job?  
 13 MR. GREEN: Objection to form.  
 14 You may answer.  
 15 A. I can't remember whether  
 16 I -- whether I specifically said that to  
 17 them. I know I specifically talked about,  
 18 you know -- you know, any allegations of  
 19 -- of -- you know, the investigation, that  
 20 they were -- they were conducting, if I  
 21 knew anything about any harassment issues.  
 22 Q. Right. What -- when they  
 23 interviewed you, did they ask you a series  
 24 of questions, and you responded to --  
 25 A. Yes.

416

1 MILLS  
 2 Q. -- their questions?  
 3 A. Yes.  
 4 Q. Did they offer you the  
 5 opportunity to tell them anything that you  
 6 think may be relevant to what they were  
 7 looking into?  
 8 MR. GREEN: Objection to form.  
 9 You may answer.  
 10 A. I can't -- I can't remember  
 11 specifically the questions  
 12 that -- that -- that they -- that they  
 13 asked me, and I -- I really can't remember  
 14 whether or not I told them that Anucha  
 15 couldn't do her job, and I -- I viewed  
 16 Anucha's comments to me about not  
 17 being -- being able to do her job being a  
 18 function that she -- she felt that she  
 19 couldn't do the job any more, and like I  
 20 said I agreed. I can't remember whether  
 21 or not I discussed that with Rochelle  
 22 and --  
 23 Q. Did you -- did you think that  
 24 was relevant to her -- her sexual  
 25 harassment allegations?

417

1 MILLS  
 2 MR. GREEN: Objection to form.  
 3 You may answer.  
 4 A. You know, I thought it -- I  
 5 thought it was a function of her making a  
 6 decision that she couldn't -- she couldn't  
 7 do this job any more.  
 8 Q. Right. I understand that, but  
 9 did you also -- did you think that that  
 10 fact that Ms. Browne-Sanders had  
 11 supposedly told you that she couldn't do  
 12 her job any more was relevant to what Mr.  
 13 Moran and Ms. Noel had been looking into?  
 14 A. I didn't -- I didn't think the  
 15 fact that Isiah -- that Anucha told me  
 16 that she couldn't do her job any more had  
 17 anything to do with -- with sexual  
 18 harassment.  
 19 Q. Did you give honest answers to  
 20 all the questions that Mr. Moran and  
 21 Ms. Noel had presented to you?  
 22 A. Yes.  
 23 MR. MINTZER: Why don't we take  
 24 a break. How much time is left?  
 25 THE VIDEOGRAPHER: We have



418

1 MILLS  
 2 about seventeen minutes.  
 3 MR. MINTZER: Okay. So why  
 4 don't we take a break, and we will be able  
 5 to wrap up.  
 6 THE VIDEOGRAPHER: We are off  
 7 the record. The time is 6:51.  
 8 (Recess taken.)  
 9 THE VIDEOGRAPHER: Okay. We  
 10 are back on the record. The time is 7:01.  
 11 A. You know, I -- I still have  
 12 a -- a document that is -- that is sitting  
 13 in front of me, and I do want to take a  
 14 second to clarify.  
 15 MS. VLADECK: There is no  
 16 question.  
 17 Q. There is really no question  
 18 pending, Mr. Mills. Mr. Green can ask you  
 19 a question at the end of the deposition if  
 20 you would like.  
 21 MR. GREEN: I think the witness  
 22 is saying he would like to add to a prior  
 23 answer to be responsive to your question,  
 24 and I think he has that right.  
 25 Q. Go ahead.

419

1 MILLS  
 2 A. There was a question about  
 3 a -- a raise that Anucha received, and  
 4 I -- I just wanted to clarify that  
 5 it -- that there was a job -- there was a  
 6 grade change that took place in Anucha's  
 7 job, and there was a -- a salary  
 8 adjustment that reflected the grade  
 9 change. It was not a merit increase, and  
 10 I -- I just had never seen. I saw that  
 11 around the way that it was processed from  
 12 my vantage point was a -- a salary  
 13 adjustment form, and while I am copied on  
 14 this E mail I hadn't remembered seeing in  
 15 this format. So --  
 16 Q. Did you have any conversations  
 17 in any of the breaks that helped refresh  
 18 your recollection about this event?  
 19 MR. GREEN: You may answer  
 20 except to the extent that -- I withdraw  
 21 that objection. You may answer fully.  
 22 A. Yes.  
 23 Q. And with whom did you have a  
 24 conversation to refresh your recollection  
 25 about that event?

420

1 MILLS  
 2 A. With counsel.  
 3 Q. Okay. Prior to learning that  
 4 Ms. Browne-Sanders' lawyers had contacted  
 5 The Garden, could you tell me all of the  
 6 people who you told that  
 7 Ms. Browne-Sanders had told you that she  
 8 could no longer perform her duties at The  
 9 Garden?  
 10 A. The -- the only people I  
 11 remember having that conversation with  
 12 were Rusty and -- and Hank. I can't  
 13 remember whether or not I -- I had the  
 14 conversation with Jim.  
 15 Q. And did either Mr. McCormack or  
 16 Mr. Ratner suggest that Ms. Browne-Sanders  
 17 receive a severance package?  
 18 A. What -- what Hank said to me was  
 19 you should -- you should get together with  
 20 Rusty and let's figure out some kind  
 21 of -- let's figure out some kind  
 22 of -- some kind of package to make sure  
 23 that this happens.  
 24 Q. And by package you understood  
 25 that he was taking about a severance

421

1 MILLS  
 2 package?  
 3 A. Well, some kind of a -- Anucha  
 4 had said to me that she wanted to -- to  
 5 have her job while she -- it was important  
 6 for her to have a job while she was out  
 7 seeking another -- another one or -- or  
 8 got another job, so I don't -- it hadn't  
 9 gotten it a point where we discussed what  
 10 it was that we paid her through some  
 11 period of time or if we allowed her to  
 12 leave the minute that she received the job  
 13 no matter what point it was, but it was  
 14 just that, you know, Hank -- Hank didn't  
 15 think she was up to speed in the job. I  
 16 had come to the conclusion that she wasn't  
 17 and when she told me that she didn't  
 18 want -- that she couldn't do this job any  
 19 more I agreed with her. I thought it was  
 20 time to come up -- come up with a way for  
 21 her to move on.  
 22 Q. Other than conversations that  
 23 you had with counsel or in the presence of  
 24 counsel, did you ever speak to anyone at  
 25 MSG about any sort of monetary demand that

422

1 MILLS  
 2 Ms. Browne-Sanders supposedly made?  
 3 A. No. Well, you -- I should -- I  
 4 should correct that. I -- I think that at  
 5 some point during a press conference  
 6 that -- that we had at some place that I  
 7 may have made -- made some comments during  
 8 the press conference about demands that  
 9 Anucha -- or that -- or counsel had made  
 10 of the Garden.  
 11 Q. And what did you say about that?  
 12 A. I -- I can't remember the  
 13 specifics of -- of, you know -- of exactly  
 14 what I said at the press conference but,  
 15 you know, there were tapes of it and  
 16 people covered it. I can't -- I can't  
 17 remember specifically what I said.  
 18 Q. Other than any statements at the  
 19 press conference, you don't recall making  
 20 any statements to anyone outside the  
 21 presence of counsel about a -- a demand  
 22 for money that Ms. Browne-Sanders made?  
 23 A. No.  
 24 Q. Who -- who told you the  
 25 information that you conveyed at the press

424

1 MILLS  
 2 identified the person who is going to be  
 3 filling the executive vice president job?  
 4 A. We have -- we have been in the  
 5 search process for a while. We haven't  
 6 identified a final candidate.  
 7 Q. Have you ever heard Mr. Thomas  
 8 use profanity in your presence?  
 9 A. Yes.  
 10 Q. And in what context do you  
 11 remember Mr. Thomas using profanity in  
 12 your presence?  
 13 A. You know, we -- we -- we would  
 14 talk about a game or talk about a team and  
 15 what is going on in a game, and we might  
 16 say shit or I can't believe that fucking  
 17 play. I mean those kinds of conversations  
 18 that, you know, you might have in the  
 19 context of describing what was going on in  
 20 in -- in a game.  
 21 Q. Did you ever tell the  
 22 investigators for MSG, Ms. Noel and Mr.  
 23 Moran, that it wouldn't surprise you if  
 24 Mr. Thomas had cursed someone out?  
 25 MR. GREEN: Objection to form.

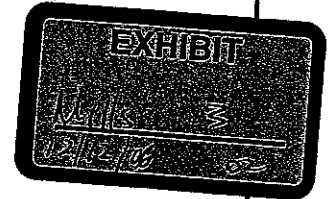
423

1 MILLS  
 2 conference about what kind of demand had  
 3 been made by Ms. Browne-Sanders or her  
 4 counsel?  
 5 MR. GREEN: To the extent that  
 6 that information was derived by  
 7 conversations with counsel, you may not  
 8 respond. If you have other independent  
 9 knowledge and you can answer the question,  
 10 you may do so.  
 11 A. Then I can't respond.  
 12 Q. Has Ms. Browne-Sanders been  
 13 replaced as senior vice president of  
 14 business operations?  
 15 A. I've actually restructured  
 16 the -- the organization and created  
 17 an -- an executive vice president position  
 18 that will in fact oversee all three teams  
 19 that we have an open search for and a  
 20 senior vice president of marketing  
 21 position that will cover the marketing  
 22 functions for all three teams. I will  
 23 open a search once I hire the executive  
 24 vice president job.  
 25 Q. You have not identified -- yet

425

1 MILLS  
 2 You may answer.  
 3 A. No, I don't remember telling  
 4 them that.  
 5 Q. Did you ever tell the  
 6 investigators that you thought that Mrs.  
 7 Browne-Sanders made up her claims after  
 8 the -- the budget meetings that you've  
 9 testified to earlier today?  
 10 A. No.  
 11 Q. Do you -- do you recall telling  
 12 the investigators that she engineered her  
 13 claims after the budget meetings?  
 14 MR. GREEN: Objection to form.  
 15 You may answer.  
 16 A. No.  
 17 Q. Do you recall telling the  
 18 investigators that she set this up after  
 19 the -- the budget meetings?  
 20 A. No, I don't recall telling her  
 21 that.  
 22 Q. Nothing like that in words or  
 23 substance?  
 24 A. Not that I can recall.  
 25 Q. Have you ever heard Frank Murphy

12



# EXEMPT PERFORMANCE APPRAISAL

Anucha Browne Sanders  
Employee's Name

V.P. Marketing  
Title

New York Knicks  
Department

Steve Mills  
Supervisor's Name

1/24/02  
Date

MSG 00350

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SECTION I Performance Rating	OUTSTANDING	ABOVE EXPECTATIONS	MEETS EXPECTATIONS	BELOW EXPECTATIONS
	PERFORMANCE RATING			
AREAS OF RESPONSIBILITY/SKILL				
<i>Teamwork:</i> Actively develops cooperative relationships company-wide and within own group, fostering integrity, productivity and support for each area of the company.	✓			
<i>Job Knowledge:</i> Possesses and applies the professional knowledge and/or technical skills necessary to perform job functions. Takes necessary steps to increase job knowledge and keeps abreast of new developments.		✓		
<i>Interpersonal Competence:</i> Elicits cooperation from supervisors, subordinates, peers and external business contacts in a positive, cooperative and courteous manner. Contributes to departmental cohesiveness and productivity.	✓ <i>up</i>	✓ <i>down</i>		
<i>Communication:</i> Expresses instructions, ideas and information clearly and directly in oral and written form. Possesses effective listening skills.	✓			
<i>Creativity &amp; Resourcefulness:</i> Generates new ideas and concepts while simplifying and/or improving work methods and procedures. Possesses ability to adjust to changes in priorities, assignments and/or working conditions.		✓		
<i>Initiative &amp; Accountability:</i> Identifies and seeks ways to enhance effectiveness and takes appropriate action. Accepts professional responsibility and accountability for all assignments.	✓			
<i>Planning &amp; Organization:</i> Budgets time and prioritizes work assignments in order to accomplish goals. Operates effectively under pressure. Actually performs what has been planned in an organized and efficient manner.	✓			
<i>Decision Making &amp; Problem Solving:</i> Obtains and analyzes facts to make sound decisions in a timely manner. Identifies and anticipates problems, changes and trends. Shows practical judgment in making decisions to formulate realistic alternatives and solutions to problems.		✓		
<i>Managerial/Supervisory Skills (if applicable):</i> Delegates responsibility while supervising and evaluating employees fairly. Trains, motivates and develops subordinates. Completes performance reviews in a timely manner. Resolves conflicts equitably. Provides leadership while encouraging staff morale, teamwork and cooperation.		✓		
<i>Cost Control (if applicable):</i> Operates within established budget and continually evaluates decisions in terms of profitability. Implements cost-saving measures, procedures and control.		✓		
<i>Guest Relations (if applicable):</i> Exhibits a helpful, courteous, FANS FIRST attitude when interacting with guests by conveying a professional, positive image. Effectively handles guest problems and prevents the escalation of conflict with guests. Adapts to a variety of guest-related situations.	✓			

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**SECTION II Performance Goals For Next Review Period**

This section should be completed as a joint process between the employee and his/her supervisor. Define the major performance goals for the next review period. Performance goals should be realistic and achievable, and should relate to the strategic planning and budget process. Specifically define how achievement of the performance goals will be ultimately measured. A target completion date should also be established for each goal. Goals should be placed in priority order.

Goals to be Achieved During the Next Review Period

Target Completion Date

1. Broader scope of work beyond marketing needs to lead the team
2. Develop or find someone to serve as VP of mktg for the Knicks
3. Develop a more nurturing management style
4. Become active in the NBA marketing community by serving on the marketing advisory board or similar group.

Plans to Achieve Goals

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_

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**SECTION III Demonstrated Strengths & Areas For Improvement**

Employee Strengths - Consider the performance rating section and identify the individual's major areas of strength.

*Arucha brings a tremendous level of maturity to our organization. Her marketing and business skills have been recognized by people across the Gender and Cable vision.*

Areas for Improvement - Consider the performance rating section and identify areas of performance where improvement can be made.

*Arucha can improve on adapting her style of managing slightly so that she gets the most out of her team. She should also continue to improve her understanding of the various presentation elements of the game.*

**SECTION IV Overall Performance Rating and Approvals**

Based on the factors that have been evaluated, indicate below the overall rating which most accurately describes the employee's total performance during the review period. Refer to the Performance Definitions for guidance.

Outstanding     Above Expectations     Meets Expectations     Below Expectations

Supervisor *[Signature]* Date *7-1-07*

Appraiser's Supervisor \_\_\_\_\_ Date \_\_\_\_\_

Human Resources \_\_\_\_\_ Date \_\_\_\_\_

**SECTION V Employee's Comments & Signature**

Employee's Comments: Include your demonstrated strengths and what your significant accomplishments were during this period. Explain the objectives that you were not able to accomplish during this period. Include any areas for development during the next review period - Use a separate sheet of paper if necessary.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I have reviewed this performance evaluation and discussed the contents with my supervisor. My signature means that I have been advised of my performance and does not necessarily imply that I agree with the appraisal ratings.

Employee *[Signature]* Date *7-1-07*

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**Plans to Achieve Goals**

Over the next review period I will take the following steps to improve in my new role:

1. I will continue to cultivate and grow existing relationships internally with the team side of our business, the other MSG properties and the Cablevision companies.
2. I will actively assess my staffing needs and identify a strong replacement for myself as VP of Marketing.
3. I will work diligently to tweak my management style in order to get the best out of my staff.
4. Assert myself to become a stronger player at the league level.
5. I will continue to improve my expertise in game presentation while broadening my scope of marketing. My end goal here is to further leverage the brand and build our fan base.

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MSG 00354  
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**MEMORANDUM**

**TO:** All Employees  
**FROM:** Steve Mills  
**DATE:** March 11, 2002  
**RE:** Anucha Browne-Sanders

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I am pleased to announce the promotion of Anucha Browne-Sanders to the position of Senior Vice President, Marketing & Business Operations of the New York Knicks.

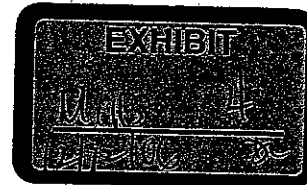
Anucha joined Cablevision in 2001 as Vice President, Marketing where she developed a number of marketing initiatives that successfully integrated the Knicks brand with other Cablevision business units. She has also played a key role in the reorganization of the entire front office staff of the NY Knicks.

In her new role, Anucha will be responsible for the day to day management of the Knicks front office and serve as the team's chief marketing officer. Anucha will report to me.

Prior to joining Cablevision, Anucha was the Manager of Marketing Strategy & Corporate Marketing at IBM where she was responsible for developing and activating IBM's Olympic and NBA sponsorships.

Anucha holds a Bachelors of Science degree in Communications from Northwestern University and a Masters in Marketing Communications from Florida State University.

During her collegiate days at Northwestern University, Anucha had an outstanding basketball career. In her senior year, she was the NCAA Scoring Champion, a Kodak All-American, a member of the United States National Team and was named Northwestern University's Athlete of the Decade.



MSG 01946

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Please join me in congratulating Anucha on this well-deserved promotion.

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MSG 01947  
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# EXECUTIVE PERFORMANCE APPRAISAL

Anucha Browne-Sanders

Employee's Name

SVP, Marketing & Business Operations

Title

New York Knicks

Department

Steve Mills

Supervisor's Name

1/24/03

Date



MSG 00338

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SECTION I Performance Rating	OUTSTANDING	ABOVE EXPECTATIONS	MEETS EXPECTATIONS	BELOW EXPECTATIONS
	PERFORMANCE RATING			
AREAS OF RESPONSIBILITY/SKILL				
<i>Teamwork:</i> Actively contributes to company-wide cohesiveness by developing cooperative relationships company-wide, and within own group, which fosters integrity, productivity and positive support for the successful achievement of goals for each area of the company.	X			
<i>Job Knowledge:</i> Demonstrates necessary level of job competency and required skills. Seeks to improve knowledge.		X		
<i>Leadership:</i> Demonstrates support and understanding for company policies, goals and objectives and positively influences others to do the same.	X			
<i>Managerial Style:</i> Delegates responsibility, supervises and evaluates employees fairly. Trains, motivates and develops subordinates. Resolves conflicts equitably. Provides leadership while encouraging staff morale and teamwork. Elicits cooperation internally and externally in a positive, cooperative and courteous manner.		X		
<i>Results:</i> Accomplishes established goals and objectives, including qualitative and quantitative measurements.	X			
<i>Cost Control:</i> Operates within established budget and continually evaluates decisions in terms of profitability. Implements cost-saving measures, procedures and controls.		X		
<i>Planning &amp; Organization:</i> Budgets time and prioritizes work assignments in order to accomplish goals. Operates effectively under pressure. Actually performs what has been planned in an organized and efficient manner.	X			
<i>Initiative:</i> Demonstrates ability to contribute, develop and carry out new ideas in an entrepreneurial environment.	X			
<i>Communication:</i> Expresses instructions, ideas and information clearly and directly in oral and written form. Possesses effective listening skills.	X			
<i>Decision Making &amp; Problem Solving:</i> Obtains and analyzes facts to make sound decisions in a timely manner. Identifies and anticipates problems, changes and trends. Shows practical judgment in making decisions to formulate realistic alternatives and solutions to problems.		X		

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**SECTION A – Results Evaluation:**  
 Evaluate performance for stated targets. Rate each target/goal (on a 1-5 scale) and multiply it by its percent weighting to determine each target/goal score. Provide a total score by adding all individual target/goal scores. Also provide an Overall Results Evaluation Rating by placing an "X" in the appropriate box at the bottom of the page.

Statement of Target/Goal	Results	(a) Rating	(b) Weighting	(a) X (b) Score
Develop a ticket strategy delivering sell-through percentages and secondary market sales exceeding the '02-03 season.			30%	
Develop a program that increases door count by 10% over the '02-03 season.			20%	
Build a team revenue stream that currently does not exist.			25%	
Become active in the NBA Marketing community by serving on the marketing advisory board or similar group.			25%	

Add all the numbers in the (a) x (b) column to get the total score:

The signatures below indicate that the appraiser and the employee have discussed the above targets/goals and expected results at the beginning of the performance year.

Appraiser's Signature/Date:  Employee's Signature/Date: 

**OVERALL RESULTS EVALUATION RATING:**

1.0 – 1.9	2.0 – 2.7	2.8 – 3.5	3.7 – 4.5	4.6 – 5.0
<b>1</b> Did Not Achieve Expected Performance	<b>2</b> Partially Achieved Expected Performance	<b>3</b> Achieved Expected Performance	<b>4</b> Exceeded Expected Performance	<b>5</b> Far Exceeded Expected Performance

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*SECTION III Demonstrated Strengths & Areas For Improvement*

Executive's Strengths - Consider the performance rating section and identify the Executive's major areas of strength.

Anucha has gained a tremendous amount of respect throughout the Garden and Cablevision. She is professional and diligent with a true commitment to the company's overall success. She has improved her knowledge of the entire organization.

Areas for Improvement - Consider the performance rating section and identify areas of performance where improvement can be made.

Anucha has made tremendous strides as a manager. She should continue looking at ways that she can modify her style to get the most from her subordinates and peers. I would like her to continue focussing on and building the in-arena presentation of Knicks games.

*SECTION IV Executive's Comments*

*SECTION V Overall Performance Rating & Approvals*

Based on the factors that have been evaluated, indicate below the overall rating which most accurately describes the Executive's total performance during the review period. Refer to the Performance Definitions for guidance.

Outstanding     Above Expectations     Meets Expectations     Below Expectations

Executive \_\_\_\_\_ Date \_\_\_\_\_

Executive's Appraiser \_\_\_\_\_ Date \_\_\_\_\_

SVP Human Resources & Administration \_\_\_\_\_ Date \_\_\_\_\_

President & CEO \_\_\_\_\_ Date \_\_\_\_\_

MSG 00341

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**SECTION D – Employee Comments:**

As an employee, you may use this section to comment on the Performance Appraisal and/or record any differences of opinion.

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**SECTION E – Development Action Plan:**

The plan may address knowledge, skills, abilities or behaviors needed to perform most effectively in current or future positions. Include no more than 3 areas.

Development Area	Action Steps	Outcome
1. Management style and techniques.	Anucha will work with Pete Olson in continuing to improve her management skills.	
2. Integrate the Knicks into cross divisional (CVC) initiative.	Conduct monthly meetings with other CVC divisions to discuss marketing opportunities.	
3.		

**SECTION F – Career Interest Discussion Summary:**

Area(s) you would like to pursue: \_\_\_\_\_

Steps you would like to take:

1. Step 1
2. Step 2
3. Step 3

**Plans To Achieve Goals**

1. I will continue to develop on the established ticketing and marketing strategy in ensure sell through percentages and secondary sales percentages higher that the current year. This plan will include a greater focus on season subscription sales and renewals:
  - Establishing clarity between Sales and customer service roles
  - Emphasis on sales skills development
  - Establishing baseline standards and expectations for sustained performance
  - Establishing measurement criteria and metrics for accountability
  - Establishing a more streamlined integration between the marketing and SS department with measurable results
2. I will create a plan that addresses the door-count 10% over this season's numbers.
3. I will continue to generate high margin FE hospitality programs and for profit events to drive additional revenue for the business.
4. I will attach myself to more NBA programs to establish a stronger presence within the NBA community.

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**MSG 00343**  
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REDACTED

**CABLEVISION**

140

MPIP

145.0  
OK

# Performance Planning and Appraisal

## Employee and Organization Information:

Anucha Browne Sanders  
Employee's Name

Steve Mills  
Appraiser's Name

SVP Marketing, NY Knicks  
Position Title

11/20/00  
Hire Date

27  
Grade

Time in Position

MSG - 2 Penn Plaza  
Employee's Location

12/1/02  
Current Appraisal Date

Executive  
Department

12/1/01  
Previous Appraisal Date

MSG  
Business Group

12/1/03  
Next Appraisal Date

## Signatures:

Appraiser: Steve Mills

Date: 2-14-03

Appraiser's Supervisor: Jim Dalton

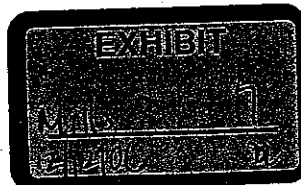
Date: \_\_\_\_\_

Employee: ASB

Date: 2-14-03

The signature does not necessarily represent the employee's agreement with the appraisal. It indicates that the employee has read and received a copy of the appraisal.

Trace Date: Sept. 1/01



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MSG 03960



REDACTED

**SELF-APPRAISAL**

**SELF-APPRAISAL FORM: Effectiveness Evaluation**  
 Using the scale below, rate performance in each key effectiveness area by placing an "X" under the rating. Then provide an Overall Effectiveness Rating by placing an "X" in the appropriate box at the bottom of the page.

	NE <small>Not Effective</small>	SE <small>Somewhat Effective</small>	E <small>Effective</small>	VE <small>Very Effective</small>
<b>KEY EFFECTIVENESS AREAS AND BEHAVIORS</b>				
<b>1. Communicates Effectively</b> <ul style="list-style-type: none"> <li>• Listens well and understands the needs of customers and others</li> <li>• Expresses ideas clearly and directly</li> <li>• Conveys confidence in communication and personal presentation</li> <li>• Persuasively communicates in a way that produces positive results</li> </ul>	NE	SE	E	VE
<b>2. Develops Relationships</b> <ul style="list-style-type: none"> <li>• Builds, manages, and sustains organizational and customer relationships to achieve goals</li> <li>• Collaborates effectively within and across departments</li> <li>• Acknowledges the contributions of others</li> <li>• Is an effective team leader and member</li> </ul>	NE	SE	E	VE
<b>3. Plans Effectively</b> <ul style="list-style-type: none"> <li>• Ensures goals and strategies support the company's vision</li> <li>• Creates efficient processes and work plans</li> <li>• Anticipates problems and takes corrective action</li> <li>• Effectively balances and communicates long term and short term priorities</li> </ul>	NE	SE	E	VE
<b>4. Makes Results Happen</b> <ul style="list-style-type: none"> <li>• Maintains an organization-wide focus on satisfying customer needs</li> <li>• Defines and clarifies organizational processes, roles and responsibilities</li> <li>• Makes sound, timely decisions that lead to results</li> <li>• Takes personal responsibility for achieving results</li> </ul>	NE	SE	E	VE
<b>5. Demonstrates Resilience and Flexibility</b> <ul style="list-style-type: none"> <li>• Deals effectively with multiple demands and shifting priorities</li> <li>• Shows resilience when faced with setbacks or criticism</li> <li>• Promotes and is receptive to new ideas</li> <li>• Advocates necessary organization change</li> </ul>	NE	SE	E	VE
<b>6. Manages and Develops People (Applies only to those with supervisory responsibility.)</b> <ul style="list-style-type: none"> <li>• Conducts and completes performance appraisal reviews on time</li> <li>• Ensures departmental career planning and development</li> <li>• Provides ongoing coaching and performance feedback</li> <li>• Works to discuss and resolve employee work issues and concerns</li> </ul>	NE	SE	E	VE
<b>7. Supports Company Values and Policies</b> <ul style="list-style-type: none"> <li>• Practices and promotes the company's values</li> <li>• Consistently upholds and follows the company's policies</li> <li>• Acts honestly and ethically in the workplace</li> <li>• Treats others in a fair and respectful manner</li> </ul>	NE	SE	E	VE
<b>8. Develops Self</b> <ul style="list-style-type: none"> <li>• Knows own strengths and weaknesses</li> <li>• Learns from experience</li> <li>• Actively seeks feedback for improvement</li> <li>• Takes responsibility for completing development plan (Section E)</li> </ul>	NE	SE	E	VE
<b>OVERALL EFFECTIVENESS RATING:</b>	NE <small>Not Effective</small>	SE <small>Somewhat Effective</small>	E <small>Effective</small>	VE <small>Very Effective</small>

REDACTED

**Year-End  
Performance Appraisal  
Forms**

ii

REDACTED

YEAR-END PERFORMANCE APPRAISAL

**SECTION A - Results Evaluation:**  
 Evaluate year-end performance for stated MPIP goals. Rate each goal and multiply it by its weighting to determine each goal score. Provide a total MPIP score by adding all individual goal scores. Also provide an Overall Results Evaluation Rating by placing an "X" in the appropriate box of the bottom of the page.

Statement of Goal	Results	(a) Rating	(b) Weighting	(a) x (b) Score
Grow cash flow.	The Knicks Marketing group performed exceptionally during a very difficult advertising and team performance environment	145	35%	50.75
Develop high quality event presentation components.	The Knicks have improved the in-arena experience. New in-arena elements have been designed and executed.	145	25%	36.25
Utilize Knicks assets to assist other divisions.	Have exceeded goals outlined for cross company promotions.	150	20%	30
Improve employee relations.	Anucha has improved employee relations within the team. There is still considerable room for more growth.	140	20%	28

the MPIP score: Add all the numbers in the (a) x (b) column to get **145**

OVERALL RESULTS EVALUATION RATING:

0 - 80	81 - 99	100 - 119	120 - 139	140 - 150
1	2	3	4	5
				X

Anucha Brown Sardas *AS* — 2-14-03 *Q200*

REDACTED

<p>Develop high quality innovative event presentation components, which include in-arena game entertainment and dance teams.</p>	<ul style="list-style-type: none"> <li>• Successfully integrated the MSG Network brand into game presentation.</li> <li>• Developed an effective theme night schedule for the season and successfully implemented kids day and 70's night.</li> <li>• Executed the first webcast of it kind for the KCD auditions</li> <li>• Successfully updated video open.</li> <li>• Successfully launched a new "Star search at the Garden"</li> <li>• Introduced new teams - Ballers, Jumpers - and a much improved KCD.</li> <li>• Transformed the fan club from an offline program to an online acquisition program focused on building a wallet, SS acquisition and ongoing fan development.</li> </ul>	150	15%	375
<p>Utilize the value of Knicks assets to assist other MSG and Cablevision divisions in achieving their business goals by partnering in at least 2 cross-divisional initiatives.</p>	<ul style="list-style-type: none"> <li>• Completed production of two OOL commercials utilizing players - these were extremely successful in raising the level of interest in the OOL product line to the African American and Latino community.</li> <li>• Exploring player integration into IFC and Much Music productions.</li> <li>• Coordinating with the WIZ on field marketing initiatives.</li> <li>• Conducted focus group research - used to validate brand image and the value of key programs.</li> <li>• Conducted a series of brand building workshops to gain consensus on communication targets and brand messaging strategy.</li> <li>• Established a coordinated communications process for working across the CSC marketing divisions - Cablevision, Clearview, and MSG Network.</li> </ul>	145	20%	29
<p>Improve employee rotations. Increase the effectiveness of employees by putting greater focus on employee development.</p>	<ul style="list-style-type: none"> <li>• Putting greater focus on identifying opportunities for strong performers - Center for Creative Leadership (Jeter); IEG conference (Jeter, Pazaras).</li> <li>• Grade adjustments and promotions for top performers were completed.</li> <li>• Adjustments were made to organization structure for increased productivity and team performance.</li> <li>• Emphasize development and career planning</li> </ul>	146	20%	29
<p>Add all the numbers in the (a) x (b) column to get the total MPIP score:</p>				147

**OVERALL RESULTS EVALUATION RATING:**

0 - 80	81 - 90	100 - 119	120 - 139	140 - 160
1 Did Not Achieve Expected Performance	2 Partly Achieved Expected Performance	3 Achieved Expected Performance	4 Exceeded Expected Performance	5 Far Exceeded Expected Performance
				X

*Anucha Brown Sanders*  
EMPLOYEE (Print Name)

*ASB*  
EMPLOYEE (Sign Name)

2-14-03  
DATE

REDACTED

SELF-APPRAISAL

**SELF-APPRAISAL FORM: Results Evaluation**  
 Evaluate year-end performance for stated MPIP goals. Rate each goal and multiply it by its weighting to determine each goal score. Provide a total MPIP score by adding all individual goal scores. Also provide an Overall Results Evaluation Rating by placing an "X" in the appropriate box at the bottom of the page.

Statement of Goal	Results	(a) Rating	(b) Weighting	(a) X (b) Score
Grow cash flow (OPBITDA) by \$43.2 million over 2001	<ul style="list-style-type: none"> <li>• Exceeded FE target in a struggling economic and team environment.</li> <li>• Attained better than projected ticket revenue through the first three months of the season.</li> <li>• Offset lost FE revenue with new business opportunities – non ad sales prospecting, additional (high margin) VIP hospitality programs (VIP road trips, fantasy days), refined comp revenue share, and further expense cost containment for all FE programs.</li> <li>• Conducted extensive agency review and established Rapp Collins as an "agency of record" for The Garden.</li> <li>• Developed and executed a comprehensive ticket sales and SS retention plan.</li> <li>• Spearheaded a complete assessment of the SS sales and customer service function for the teams which will result in marked improvements moving forward.</li> <li>• Aggressively reinforced, enhanced and communicated SS benefits.</li> <li>• Successfully rolled out Ticketmaster Account Manager and Marketplace features for SS for the three teams.</li> <li>• Implemented multi-tiered direct marketing strategy for ticket sales (season, mini plan and individual) – utilizing direct mail, email, telephone.</li> <li>• Developed and executed aggressive plan for attacking waitlist and supplemental databases to identify potential SS. Successfully offset SS non renewal.</li> <li>• Successfully hired an effective and seasoned VP CR and Fan Development – Strong focus on Community Relations, Alumni Relations, field marketing, and fan development.</li> <li>• With strong assist from media partners, Elite, and sponsor partners, successfully raised the level of exposure for Alan Houston.</li> </ul>	150	33%	32.5

REDACTED

# Self-Appraisal Forms

REDACTED

PERFORMANCE PLANNING

MID-YEAR PERFORMANCE REVIEW

Evaluate progress toward stated MPIP goals. Include comments relating to performance progress, and changes in plan, as well as suggestions as to how to most effectively reach stated goals.

Statement of Goal	Mid-Year Performance Review
<p>Grow cash flow (OPBITDA) by \$43.2 million over 2001.</p>	<ul style="list-style-type: none"> <li>• Conducted extensive agency review. Contracted Rape Collins agency to assist in the development and execution of a comprehensive ticket sales and SS retention plan.</li> <li>• Created action plan to reinforce and communicate SS benefits.</li> <li>• Developing plan for the rollout of Ticketmaster Account Manager and Marketplace features for SS.</li> <li>• Implementing multi-tiered direct marketing strategy for ticket sales (season, mini plan and individual) - utilizing direct mail, email, telephone.</li> <li>• Developing plan for attaching waitlist and supplemental databases to identify potential SS.</li> <li>• FE target of \$5.4 million was not met. Final FE revenue was \$5.3 million.</li> <li>• In process of hiring VP CR and Fan Development. - Strong focus on Community Relations, Alumni Relations, field marketing, and fan development.</li> <li>• Contracted with Elite Model Management to address greater exposure opportunities for current players across the three teams.</li> </ul>
<p>Develop high quality innovative event presentation components, which include in-arena game entertainment and dance teams.</p>	<ul style="list-style-type: none"> <li>• Updating Video open with new team branding direction;</li> <li>• Researching lighting improvements in arena</li> <li>• GardenVision improvements including MSG-TV branding and programming development</li> <li>• Development of more extensive theme night plan.</li> <li>• KCD auditions with live webcasting component.</li> <li>• Researching ongoing amateur night feature.</li> <li>• Other team (Ballers, Jumpers, KCK) improvement plans.</li> </ul>
<p>Utilize the value of Knicks assets to assist other MSG and Cablevision divisions in achieving their business goals by partnering in at least 2 cross-divisional initiatives.</p>	<ul style="list-style-type: none"> <li>• Completed production of two OOL commercials utilizing players</li> <li>• Exploring player integration into IFC and Much Music productions.</li> <li>• Coordinating with the WIZ on field marketing initiatives.</li> </ul>
<p>Improve employee relations. Increase the effectiveness of employees by putting greater focus on employee development.</p>	<ul style="list-style-type: none"> <li>• Putting greater focus on identifying opportunities for strong performers - Center for Creative Leadership (Jeter); IFC conference (Jeter, Pizarro).</li> <li>• Grade adjustments and promotions for top performers is ongoing.</li> </ul>

Anucha Browne Sanders

EMPLOYEE (Print Name) \_\_\_\_\_ EMPLOYEE (Sign Name) \_\_\_\_\_ DATE \_\_\_\_\_

APPRAISER (Print Name) \_\_\_\_\_ APPRAISER (Sign Name) \_\_\_\_\_ DATE \_\_\_\_\_

REDACTED

PERFORMANCE PLANNING

GOAL PLANNING FORM

State each performance goal as specifically as possible, and list the key activities that need to be done to achieve each goal. Provide due dates and weightings for each goal.

Statement of Goal	Key Activities to Achieve Goal	Due Dates	Weighting
Grow cash flow (OP&ITDA) by \$43.2 million over 2001	<ul style="list-style-type: none"> <li>Continue to sellout all games in 2002 with no price increase by establishing and implementing a comprehensive ticket sales strategy.</li> <li>Maintain FE revenues consistent with 2001 level.</li> <li>Enhance CR opportunities for the New York Knicks and our players.</li> <li>Develop and implement a season subscriber benefits program.</li> </ul>	6/02 8/02 7/02 4/02	35%
Develop high quality innovative event presentation components, which include in-arena game entertainment and dance teams.	<ul style="list-style-type: none"> <li>Introduce new in arena entertainment elements.</li> <li>Establish theme nights throughout the season.</li> <li>Continue to improve the dance team presentation.</li> </ul>	5/02	25%
Utilize the value of Knicks assets to assist other MSG and Cablevision divisions in achieving their business goals by partnering in at least 2 cross-divisional initiatives	<ul style="list-style-type: none"> <li>Leverage the strength of NYK as an asset across MSG and CSC properties.</li> <li>Develop tighter integration with the MSG Network to ensure consistent Knicks-branded messaging.</li> </ul>	7/02	20%
Improve employee relations. Increase the effectiveness of employees by putting greater focus on employee development.	<ul style="list-style-type: none"> <li>Implement HR initiative in accordance with tactics agreed to with Cablevision HR.</li> <li>Encourage employee professional growth opportunities.</li> </ul>	8/02	20%
Total Weighting = 100%			

EMPLOYEE (Print Name)

EMPLOYEE (Sign Name)

DATE

APPRAISER (Print Name)

APPRAISER (Sign Name)

DATE




REDACTED

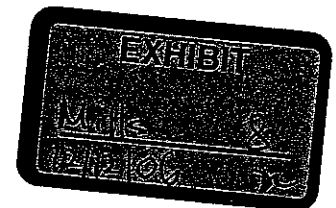
Cablevision Systems Corporation

2003 MPIP Individual Ratings

2003 Unit Head	2003 Unit	Grade	Name	Title	2003 Individual Rating (1 to 5)
Mills, Stephen C	NY KNICKS	27	Browne-Sanders, Anucha	SVP - Marketing & Business Ops	<u>4</u> <del>5</del>
Browne-Sanders, Anucha	NY KNICKS	25	Feigin, Peter	VP - Marketing NY Knicks	<u>3</u>
Browne-Sanders, Anucha	NY KNICKS	24	Buchholz, Karin J	VP - Comm Rel & Fan Develop	<u>6</u>

  
 Steve Mills

Player Dev





MPIP

# Performance Appraisal

Employee and Organization Information:

Employee's Name  
Anucha Browne Sanders

Appraiser's Name  
Steve Mills

Position Title  
SVP, Marketing & Business Operations

Appraisal Date

Business Group  
New York Knicks

Signatures:

Appraiser: \_\_\_\_\_

Date: \_\_\_\_\_

Appraiser's Supervisor: \_\_\_\_\_

Date: \_\_\_\_\_

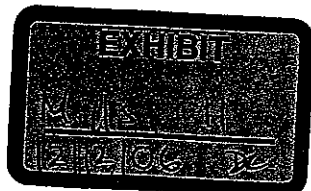
Employee\*: \_\_\_\_\_

Date: \_\_\_\_\_

\*The signature does not necessarily represent the employee's agreement with the appraisal. It indicates that the employee has read and received a copy of the appraisal.

Date reviewed with employee: \_\_\_\_\_

revised 1/1/05



**SECTION A— Effectiveness: Using the scale below, rate performance in each key effectiveness area by placing the appropriate number in the rating box. If an area is not applicable, indicate N/A in the rating box. Use the comment section available in each effectiveness area to provide additional information. If the rating is below achieved expected performance, examples must be provided in the comments section.**

<b>1</b> Did Not Achieve Expected Performance	<b>2</b> Partially Achieved Expected Performance	<b>3</b> Achieved Expected Performance	<b>4</b> Exceeded Expected Performance	<b>5</b> Far Exceeded Expected Performance
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KEY EFFECTIVENESS AREAS AND BEHAVIORS	RATING
<p><b>1. Job Knowledge</b></p> <ul style="list-style-type: none"> <li>• Possess and applies professional knowledge and/or technical skills required to perform job functions</li> <li>• Takes necessary steps to increase job knowledge and keeps current with new developments, ideas, trends and technology</li> </ul> <p>Comments:</p>	4
<p><b>2. Communicates Effectively</b></p> <ul style="list-style-type: none"> <li>• Listens well and understands the needs of customers and others</li> <li>• Expresses ideas clearly and directly</li> <li>• Conveys confidence when communicating</li> <li>• Persuasively communicates in a way that produces positive results</li> </ul> <p>Comments:</p>	5
<p><b>3. Develops Relationships</b></p> <ul style="list-style-type: none"> <li>• Builds, manages, and sustains organizational and customer relationships to achieve goals</li> <li>• Collaborates effectively within and across departments</li> <li>• Acknowledges the contributions of others</li> <li>• Is an effective team leader and member</li> </ul> <p>Comments:</p>	4
<p><b>4. Plans Effectively</b></p> <ul style="list-style-type: none"> <li>• Ensures goals and strategies support the company's vision</li> <li>• Creates efficient processes and work plans</li> <li>• Anticipates problems and takes corrective action</li> <li>• Effectively balances and communicates long term and short term priorities</li> </ul> <p>Comments:</p>	4
<p><b>5. Makes Results Happen</b></p> <ul style="list-style-type: none"> <li>• Maintains an organization-wide focus on satisfying customer (internal and external) needs</li> <li>• Defines and clarifies organizational processes, roles and responsibilities</li> <li>• Makes sound, timely decisions that lead to results</li> <li>• Takes personal responsibility for achieving results</li> </ul> <p>Comments:</p>	4

revised 1/1/05

<b>6. Demonstrates Resilience and Flexibility</b> <ul style="list-style-type: none"> <li>• Deals effectively with multiple demands and shifting priorities</li> <li>• Shows resilience when faced with setbacks or criticism</li> <li>• Promotes and is receptive to new ideas</li> <li>• Advocates necessary organization change</li> </ul> Comments:	4
<b>7. Supports Company Values and Policies</b> <ul style="list-style-type: none"> <li>• Practices and promotes the company's values</li> <li>• Consistently upholds and follows the company's policies</li> <li>• Supports and practices the code of business conduct and ethics</li> <li>• Acts honestly and ethically in the workplace</li> <li>• Treats others in a fair and respectful manner</li> </ul> Comments:	4
<b>8. Develops Self</b> <ul style="list-style-type: none"> <li>• Knows own strengths and weaknesses</li> <li>• Learns from experience</li> <li>• Actively seeks feedback for improvement</li> </ul> Comments:	3
<b>9. Manages and Develops People <i>(Applies only to those with supervisory responsibilities)</i></b> <ul style="list-style-type: none"> <li>• Conducts and completes performance appraisal reviews on time</li> <li>• Ensures departmental career planning and development</li> <li>• Provides coaching and performance feedback where appropriate</li> <li>• Works to discuss and resolve employee work issues and concerns</li> <li>• Promotes and encourages diversity within the organization</li> </ul> Comments:	5
Add numbers together in the Rating Boxes to receive a total. Divide total by 8 or 9 to determine Overall Effectiveness Rating. Place an X in the appropriate box below.	37 <b>Total Rating</b>

<b>Overall Effectiveness Rating:</b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; text-align: center; font-weight: bold;">1</td> <td style="width: 20%; text-align: center; font-weight: bold;">2</td> <td style="width: 20%; text-align: center; font-weight: bold;">3</td> <td style="width: 20%; text-align: center; font-weight: bold;">4</td> <td style="width: 20%; text-align: center; font-weight: bold;">5</td> </tr> <tr> <td style="text-align: center; font-size: 8px;">Did Not Achieve Expected Performance</td> <td style="text-align: center; font-size: 8px;">Partially Achieved Expected Performance</td> <td style="text-align: center; font-size: 8px;">Achieved Expected Performance</td> <td style="text-align: center; font-size: 8px;">Exceeded Expected Performance</td> <td style="text-align: center; font-size: 8px;">Far Exceeded Expected Performance</td> </tr> <tr> <td></td> <td></td> <td></td> <td style="text-align: center; font-size: 18px; font-weight: bold;">X</td> <td></td> </tr> </table>	1	2	3	4	5	Did Not Achieve Expected Performance	Partially Achieved Expected Performance	Achieved Expected Performance	Exceeded Expected Performance	Far Exceeded Expected Performance				X	
1	2	3	4	5												
Did Not Achieve Expected Performance	Partially Achieved Expected Performance	Achieved Expected Performance	Exceeded Expected Performance	Far Exceeded Expected Performance												
			X													

**SECTION B – Goals/Accomplishments Achieved:**  
 List the top three goals/accomplishments achieved during this review period.

1.  
 Anucha embraced the role of P&L Manager during this period. She challenged her staff and all service providers to drive revenues and control expenses.

2.  
 Anucha effectively managed through the organizational and philosophical changes when Isiah Thomas was hired. She has managed to derive upon key player involvement in team business and marketing initiatives with less player availability.

3

revised 1/1/05

3.

Anucha delivered a 11.5% ticket price increase and completed the first stage of rescaling the arena for Knicks games.

**SECTION C – Additional Comments: Use this section to provide additional comments other than those provided in Section A.**

Anucha must continue to develop her ability to focus and identify the issues and initiatives most important to the team's overall success. She has done excellent job of building a first class organization and a strong staff.

**SECTION D – Overall Performance Rating: Based on Sections A, B and C provide an overall rating by placing an X in the appropriate box below.**

**OVERALL PERFORMANCE RATING:**

1 Did Not Achieve Expected Performance	2 Partially Achieved Expected Performance	3 Achieved Expected Performance	4 Exceeded Expected Performance	5 Far Exceeded Expected Performance
			X	

**SECTION F – Employee Comments: As an employee, you may use this section to comment on the Performance Appraisal and/or record any differences of opinion.**

revised 1/1/05