

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|---|---|---------------------------|
| ----- | X | |
| ANUCHA BROWNE SANDERS, | : | |
| | : | |
| Plaintiff, | : | |
| | : | 06 Civ. 00589 (GEL) (DCF) |
| - against - | : | |
| | : | DECLARATION OF |
| MADISON SQUARE GARDEN, L.P., ISIAH LORD | : | BRIAN G. CESARATTO |
| THOMAS III AND JAMES L. DOLAN, | : | |
| | : | |
| Defendants. | : | |
| ----- | X | |

Brian G. Cesaratto declares under penalty of perjury:

1. I am a member of the law firm of Epstein Becker & Green, P.C., attorneys for defendants Madison Square Garden, L.P. ("MSG") and James L. Dolan ("Dolan"), and I submit this declaration in support of MSG's and Dolan's Motion For Partial Summary Judgment. The purpose of this declaration is to identify pleadings, discovery requests and responses, deposition transcripts and exhibits thereto, and court submissions.

2. Attached as Exhibit A is a true and correct copy of excerpts taken from the Deposition Transcript of Anucha Browne Sanders dated November 27, 2006.

3. Attached as Exhibit B is a true and correct copy of excerpts taken from the Deposition Transcript of Anucha Browne Sanders dated November 28, 2006.

4. Attached as Exhibit C is a true and correct copy of exhibit BS-V to the Deposition Transcript of Anucha Browne Sanders dated November 28, 2006 (identified as a press release issued by MSG regarding Plaintiff's promotion in March 2002).

5. Attached as Exhibit D is a true and correct copy of excerpts taken from the Deposition transcript of Joseph Favorito dated February 12, 2007.

6. Attached as Exhibit E is a true and correct copy of exhibit BS-C to the Deposition Transcript of Anucha Browne Sanders dated November 28, 2006 (identified as MSG's Confidentiality, Code of Business Conduct and Proprietary Property Agreement (the "Agreement") signed by Anucha Browne Sanders on November 21, 2000).

7. Attached as Exhibit F is a true and correct copy of exhibit BS-D to the Deposition Transcript of Anucha Browne Sanders dated November 28, 2006 (identified as page 2 of MSG's Code of Conduct).

8. Attached as Exhibit G are true and correct copies of press articles produced by Plaintiff in discovery..

9. Attached as Exhibit H is a true and correct copy of excerpts from Defendant MSG's First Request For Production of Documents dated April 11, 2006.

10. Attached as Exhibit I is a true and correct copy of excerpts from Plaintiff's Responses To Defendant MSG's First Request For Production of Documents dated June 20, 2006.

11. Attached as Exhibit J is a true and correct copy of a July 31, 2006 letter from counsel for MSG and Dolan to Plaintiff's counsel.

12. Attached as Exhibit K is a true and correct copy of an August 11, 2006 letter from Plaintiff's counsel to counsel for MSG and Dolan.

13. Attached as Exhibit L is a true and correct copy of the November 1, 2006 joint letter to the Court.

14. Attached as Exhibit M is a true and correct copy of this Court's November 6, 2006 Order.

15. Attached hereto as Exhibit N is a true and correct copy of a November 21, 2006 letter from Plaintiff's counsel producing Plaintiff's federal and New York and New Jersey state tax returns for 2000-2005. Attached hereto as Exhibit O is a true and correct copy of a November 24, 2006 letter from Plaintiff's counsel producing Plaintiff's amended federal and New York and New Jersey state tax returns for 2003 and 2004.

16. Attached as Exhibit P is a true and correct copy of Plaintiff's 2001 federal income tax return provided by Plaintiff.

17. Attached as Exhibit Q is a true and correct copy of Plaintiff's 2002 federal income tax return provided by Plaintiff.

18. Attached as Exhibit R is a true and correct copy of Plaintiff's 2003 federal income tax return provided by Plaintiff.

19. Attached as Exhibit S is a true and correct copy of exhibit BS-B to the Deposition Transcript of Anucha Browne Sanders dated November 28, 2006 (identified as Plaintiff's 2004 federal income tax return provided by Plaintiff).

20. Attached as Exhibit T are true and correct copies of Plaintiff's 2001 New York State non-resident and New Jersey State income tax returns provided by Plaintiff.

21. Attached as Exhibit U are true and correct copies of Plaintiff's 2002 New York State non-resident and New Jersey State income tax returns provided by Plaintiff.

22. Attached as Exhibit V are true and correct copies of Plaintiff's 2003 New York State non-resident and New Jersey State income tax returns provided by Plaintiff.

23. Attached as Exhibit W is a true and correct copy of Plaintiff's 2003 amended federal income tax return provided by Plaintiff.

24. Attached as Exhibit X is a true and correct copy of Plaintiff's 2004 amended federal income tax return provided by Plaintiff.

25. Attached as Exhibit Y is a true and correct copy of excerpts from the deposition transcript of Roy Sanders, dated December 14, 2006.

26. Attached as Exhibit Z is a true and correct copy of excerpts from the deposition transcript of Leon Reimer held on January 22, 2007.

27. Attached as Exhibit AA is the Stipulation of Anucha Browne Sanders dated April 4, 2007.

28. Attached as Exhibit BB is a true and correct copy of excerpts from the deposition transcript of Brock Weaver, dated December 21, 2006.

29. Attached as Exhibit CC are true and correct excerpts from the deposition transcript of [REDACTED] dated January 23, 2007.

30. Attached as Exhibit DD are true and correct excerpts from the deposition transcript of Barry Watkins, dated February 26, 2007.

31. Attached as Exhibit EE is a true and correct copy of Plaintiff's January 24, 2006 Complaint.

32. Attached as Exhibit FF is a true and correct copy of Plaintiff's July 25, 2006 Amended Complaint.

33. Attached as Exhibit GG is a true and correct copy of Plaintiff's November 10, 2006 Second Amended Complaint.

34. Attached as Exhibit HH is a true and correct copy Plaintiff's Supplemental Disclosures Pursuant to Fed. R. Civ. P. 26 dated March 19, 2007.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2007, in New York, New York.

s/Brian G. Cesaratto

BRIAN G. CESARATTO