

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

06 CV 0589 (GEL)

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

Defendants.
-----X

VIDEOTAPED DEPOSITION OF ANUCHA BROWNE SANDERS

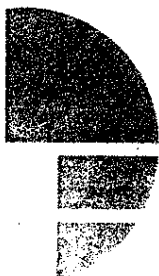
New York, New York

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1 ANUCHA BROWNE SANDERS

2 reasonable and appropriate. You've got
3 very good lawyers here. I happen to know
4 them from other times. So I know they are
5 real good. I am not just saying that. So
6 you are well protected here in any event.

7 So I'll begin.

8 You came to the Garden when?

9 A In 2000.

10 Q What month?

11 A In 2000, November 2000.

12 Q November 2000.

13 You came over from IBM?

14 A Yes.

15 Q Before that, you were at
16 Eastman Kodak; is that correct?

17 A Prior to IBM, I was with
18 Eastman Kodak.

19 Q I have a copy of your
20 employment application from when you
21 applied for IBM. And it refers to Eastman
22 Kodak, and it says something to the effect
23 that you had a separation package from
24 them.

25 Are you familiar with that?

1 ANUCHA BROWNE SANDERS

2 anything happened.

3 MS. VLADECK: Objection to the
4 form.

5 A I don't know -- well, he was
6 eventually moved to another division.

7 Q Where he did not have contact
8 with you?

9 A No, he didn't.

10 Q And you considered that to be
11 the appropriate action of management in
12 light of your complaints?

13 MS. VLADECK: Objection to
14 form.

15 A It was their action.

16 Q Did you consider it
17 appropriate?

18 A Yeah, I was comfortable with
19 it.

20 Q You came over to the Garden in
21 November of 2000; is that right?

22 A Yes.

23 Q When you came over to the
24 Garden, is it fair to say that the person
25 that hired you was Steve Mills?

1 ANUCHA BROWNE SANDERS

2 MS. VLADECK: Objection to
3 form.

4 A That's who hired me.

5 Q That's who hired you?

6 A Yes.

7 Q And what, if anything, was
8 your relationship to Mills before you came
9 to the Garden?

10 A I had met him before in a
11 business setting. That's about it.

12 Q Under what circumstances had
13 you met him, if you could tell us, if you
14 could recall.

15 A When he was at the MBA League
16 offices, I had lunch with him.

17 Q Anything else?

18 A No. I think his wife is in a
19 group that I had belonged to.

20 Q What sort of group?

21 A Just a play group for
22 children.

23 Q Say again?

24 A A play group for our children.

25 Q In addition to that, wasn't

1 ANUCHA BROWNE SANDERS

2 present for you to let her finish the
3 answer.

4 MR. PARCHER: I don't agree
5 that she wasn't finished with that
6 part of it. I just don't. I hear a
7 persons' voice dropping off
8 differently than you.

9 MS. VLADECK: Maybe if you
10 watch, then you can see the lips
11 moving, too.

12 MR. PARCHER: I'm watching
13 your client pretty good. I notice
14 you are watching me, but I'm watching
15 your client. Maybe you should watch
16 her. Her tone of voice, her eyes,
17 her body language. You can get a lot
18 of insight.

19 Q What do you say, approximately
20 when?

21 A Approximately when. I think
22 this ad sales meeting took place in the
23 '04 time frame. Probably -- maybe spring,
24 summer. Because it was around the
25 up fronts for ad sales.

1 ANUCHA BROWNE SANDERS

2 Isiah that day?

3 A Frank Murphy came in my
4 office, and we were -- I think it was to
5 discuss player appearances, something
6 around player appearances. And he started
7 yelling at me. He said, "I don't like the
8 way I've been treated here for two years,
9 and now you are going to pay." And he
10 said this standing over my desk as I was
11 sitting at my desk. And he said, "If you
12 want a relationship with Isiah, you are
13 going to have to go through me." And he
14 called me a "fucking bitch." I told him
15 to get out of my office. And then I got
16 on the phone with Isiah.

17 Q Now, you say -- what did you
18 say it had something to do with?

19 A I think it was player
20 appearances. It was player -- it
21 certainly was player appearances,
22 something around player availability.

23 Q Excuse me just a second. When
24 I turn my back it's because --

25 Let me ask you something while

1 ANUCHA BROWNE SANDERS

2 we're waiting for Lisa to pull a document
3 for me.

4 Did it ever occur to you that
5 you could have avoided meetings alone with
6 Thomas if he was saying unpleasant things
7 to you?

8 MS. VLADECK: Objection to
9 form.

10 A I wasn't seeking him out.

11 Q That's not what I'm asking
12 you, in all candor.

13 Did it ever occur to you,
14 cross your mind, that since every time you
15 saw this guy he was using profanity and/or
16 cursing at you, and you said he wasn't
17 doing it in front of other people, that
18 you could avoid meeting with him alone?

19 MS. VLADECK: Objection to
20 form.

21 A Yes, it did occur to me.

22 Q Did you ever take it up with
23 Steve Mills?

24 A I think we decided later on
25 that he would basically be -- that Steve

1 ANUCHA BROWNE SANDERS

2 responsibility for parts of the P&L.

3 Q But the ultimate
4 responsibility for P&L and the budgeting
5 at the Garden, as related to the Knicks,
6 was yours, correct?

7 MS. VLADECK: Objection to
8 form.

9 A I would consider myself a P&L
10 manager, and in that role, I had people
11 providing me information.

12 The ultimate ownership of the
13 P&L --

14 Q Sorry. I was rude, but I did
15 not mean to be rude. Would you mind
16 saying it again.

17 A In my role, I was the P&L
18 manager. So I owned the revenue streams.
19 The budget process was a collaborative
20 process, and it involved myself, it
21 involved Mark Piazza who oversaw P&L for a
22 number of different entities, as well as
23 Brian LaFemina who oversaw suites and
24 tickets and some of the ticket sales
25 responsibilities.