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*Attorneys for Defendant
Madison Square Garden, L.P.*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
ANUCLA BROWNE SANDERS,

Plaintiff,

against

MADISON SQUARE GARDEN, L.P. AND
ISIAH LORD THOMAS III,

Defendants.

06 CV 0589 (GEL)

**DEFENDANT MADISON
SQUARE GARDEN'S FIRST
REQUEST FOR PRODUCTION
OF DOCUMENTS**

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PLEASE TAKE NOTICE that, pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure ("FRCP") and Rule 26.3 of the Local Civil Rules of the United States District Court for the Southern and Eastern Districts of New York, Madison Square Garden, L.P. ("MSG"), by its attorneys, Epstein Becker & Green, P.C. and Morgan, Lewis & Bockius LLP, hereby requests that within 30 days after service of this Request, Plaintiff Anucha Browne Sanders (1) produce and permit Defendant MSG to inspect and copy each of the documents requested below at the offices of Epstein Becker & Green, P.C., 250 Park Avenue, New York,

50. All documents concerning Plaintiff's allegations that MSG discriminated against her in the terms and conditions of her employment based on her sex.
51. All documents concerning Plaintiff's alleged complaint(s) of discrimination based on her sex.
52. All documents concerning the alleged discriminatory and/or retaliatory treatment to which Plaintiff was allegedly subjected by MSG.
53. All documents concerning any promises, commitments or representations made to Plaintiff regarding the terms and conditions of her employment with MSG.
54. All documents that Plaintiff received from or as a result of her employment with MSG concerning MSG's policies and procedures.
55. All documents that Plaintiff received from or as a result of her employment with MSG concerning MSG's complaint policies and procedures regarding sexual harassment, discrimination and/or retaliation.
56. All documents obtained by Plaintiff from or as a result of her employment at MSG.
57. All documents concerning Plaintiff's recruitment and/or application for employment with MSG.
58. All documents concerning the alleged damages which Plaintiff contends she has sustained and for which she seeks recovery in this lawsuit.
59. Copies of all federal, state and local income tax returns (including all schedules, forms, statements and exhibits) filed by Plaintiff, and all pay check stubs, W-2 forms, 1099 forms and other documents reflecting the receipt of income by Plaintiff.

75. All documents concerning Mills.

76. All documents concerning Marbury.

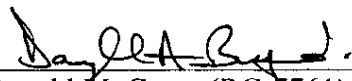
77. All documents concerning Frank Murphy.

78. All documents concerning any communications between plaintiff and any MSG employee, consultant or agent, current or former, since January 19, 2006, including, but not limited to, Buchholz and Jeff Nix.

79. All documents concerning Jeff Nix.

Dated: New York, New York
April 11, 2006

EPSTEIN BECKER & GREEN, P.C.

By: 
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