

Sue Ellen Eisenberg (SE-4713) – *admitted pro hac vice*
Lucetta Franco (LF-7638) - *admitted pro hac vice*
Eisenberg & Bogas, P.C.
33 Bloomfield Hills Parkway, Suite 145
Bloomfield Hills, Michigan 48304-2945
(248) 258-6080

- and -

Laurie Berke-Weiss (LB-3445)
Louis Pechman (LP-6395)
Berke-Weiss & Pechman, LLP
488 Madison Avenue
New York, New York 10022
(212) 583-9500

Attorneys for Defendant Isiah Lord Thomas III

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

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

Defendants.

Civil Case No. 06 Civ. 0589 (GEL) (DCF)

ECF CASE

REPLY DECLARATION OF
LUCETTA V. FRANCO

LUCETTA V. FRANCO, under penalty of perjury, affirms and states as follows:

1. I am an attorney with the firm of Eisenberg & Bogas, P.C., which represents Isiah Lord Thomas III in the above-captioned matter. I am admitted to the Bar of the State of Michigan and *pro hac vice* to this Court. This reply declaration is submitted in further support of defendants' motion for partial summary judgment and to

enclose the following documents, which are documents filed or produced in discovery for this matter, for the Court's review.

2. Attached hereto as Exhibit M are excerpts from the transcript of the deposition of James L. Dolan ("Dolan") taken on December 11, 2006.

3. Attached hereto as Exhibit N are excerpts from the transcript of the deposition of John D. Moran ("Moran") taken on November 10, 2006.

4. Attached hereto as Exhibit O are excerpts from the transcript of the deposition of Stephen C. Mills ("Mills") taken on December 12, 2006.

5. Attached hereto as Exhibit P are excerpts from the transcript of the deposition of Pete Olsen ("Olsen") taken on December 13, 2006.

6. Attached hereto as Exhibit Q are excerpts from the transcript of the deposition of Hank Ratner ("Ratner") taken on November 30, 2006.

7. Attached hereto as Exhibit R are excerpts from the transcript of the deposition of Rusty McCormack ("McCormack") taken on November 7, 2006.

8. Attached hereto as Exhibit S are excerpts from the transcript of the deposition of Anucha Browne Sanders ("Browne Sanders") taken on November 27, 2006, and on November 28, 2006.

9. Attached hereto as Exhibit T are excerpts from the transcript of the deposition of Isiah Lord Thomas, III ("Thomas") taken on December 8, 2006.

10. Attached hereto as Exhibit U are excerpts from the transcript of the deposition of Joseph Favorito ("Favorito") taken on February 12, 2007.

11. Attached hereto as Exhibit V are excerpts from the transcript of the deposition of Barry Watkins ("Watkins") taken on February 26, 2007.

12. Attached hereto as Exhibit W are Plaintiff's Supplemental Disclosures pursuant to Fed. R. Civ. P. 26, dated March 19, 2007 and the attachment to thereto.

13. Attached hereto as Exhibit X is Exhibit 21 to the trial transcript of *Osorio v. Source Enterprises, Inc.*, 2007 U.S. Dist. LEXIS 18725 (S.D.N.Y. Mar. 5, 2007).

14. Attached hereto as Exhibit Y are excerpts from the transcript of the deposition of Rochelle Noel ("Noel") taken on January 29, 2007.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 8, 2007 in New York, NY.


LUCETTA V. FRANCO