

EXHIBIT O

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.

1 MILLS

2 A. Yes.

3 Q. And that corresponded with, if
4 you look at the next page, it appears to
5 correspond with far exceeding -- far
6 exceeded expected performance; is that
7 correct?

8 A. Yes.

9 Q. And is that how you actually
10 viewed Ms. Browne-Sanders' performance at
11 the time?

12 A. Yes.

13 Q. Mr. Mills, did there come a
14 point where Ms. Browne-Sanders was fired
15 from MSG?

16 A. Yes.

17 Q. When was that?

18 A. I -- I don't know the specific
19 dates, but in, you know, January or
20 December -- January of '06.

21 Q. Why was she fired?

22 A. Well, first of all, Anucha came
23 to me and -- in late November and
24 expressed to me that she could no
25 longer -- felt that she could do her job

1 MILLS

2 at The Garden. She had felt that she had
3 tried do it in a number of ways, both
4 being aggressive and being passive, but
5 that she couldn't -- she lost the respect
6 of her -- her employees. She lost the
7 respect of her peers and that she couldn't
8 function in her job and that she needed my
9 help to find another job, and I agreed
10 with her, and -- and ultimately we -- she
11 was fired because she really was
12 not -- she was unable to -- to lead the
13 Knicks organization strategically and
14 grasp the concepts of managing the P and L
15 and being the complete -- the strategic
16 leader of the Knicks organization. She
17 also did not -- was unable to perform in
18 -- in the budget process, and the P and
19 L responsibilities of the Knicks. She
20 had, you know, disastrous budget meetings
21 during -- during -- during '05.

22 She had demonstrated an
23 inability to work with her peers and
24 manage her relationships across The Garden
25 from our advertising sales group to our

1 MILLS

2 facilities operations group to the
3 relationships within the basketball
4 operations department. She -- at that
5 point in time she became -- she refused to
6 be accountable for things that were
7 clearly in any kind -- any kind of
8 problems that remained she refused to take
9 accountability for -- for them, and in
10 some instances turned and would blame me
11 for in -- issues that were her
12 responsibility. So at that point, I
13 clearly lost faith in -- and confidence in
14 her ability to -- to continue in the job,
15 and she, you know -- she at that point,
16 you know, and over -- over -- over time
17 became very resistant to -- to -- to
18 criticism and opportunities to -- to
19 understanding what things needed to be
20 changed in order for us to move forward.

21 Q. Who decided to fire her?

22 A. Ultimately it was -- it was Jim
23 Dolan.

24 Q. Did he consult with you about
25 that?

1 MILLS

2 with Mr. Dolan about each of those
3 reasons?

4 A. I had conversations with -- with
5 Rusty McCormack about -- about those
6 reasons, and, you know, I had
7 conversations with Jim clearly about those
8 views and clearly some of those reasons.

9 Q. So at some point you discussed
10 with Mr. Dolan all of your concerns and
11 criticisms about Mr. Browne-Sanders that
12 you articulated in your previous answer?

13 MR. GREEN: Objection to form.
14 You may answer, Mr. Mills.

15 A. Yes.

16 Q. But I take it from your answer
17 that Mr. Dolan had the ultimate
18 determination to -- whether to fire
19 Ms. Browne-Sanders?

20 A. Absolutely.

21 Q. And so it's fair to say when I
22 asked you why she was fired you don't know
23 what was in Mr. Dolan's head when he
24 decided to fire her; is that correct?

25 A. No, I don't know what was

1

MILLS

2 expectations and a dress policy, institute
3 -- instituting sort of more regular
4 standards around what things were going on
5 with the -- with players around practices
6 and who was in the -- who was in
7 the -- the -- in the building
8 as -- as -- as players practiced, more
9 structure around how we were going to use
10 the players in activities, the timing of
11 how we would use -- would use players in
12 activities to make sure that the players
13 were at the critical points in the season
14 focused on the things that ultimately were
15 going to make us all successful, and that
16 was winning basketball games.

17 Q. Did you have any discussions
18 with Ms. Browne-Sanders at any point after
19 Mr. Thomas was brought on board about her
20 view of Mr. Thomas' changes?

21 A. The -- yes.

22 Q. And tell me what was said in
23 those conversations with -- by you and by
24 her.

25 A. You know, there were -- there

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MILLS

were -- there were -- one instance in particular where she came to me and she told me that Isiah had -- had, you know, informed her that the players were not going to -- to make, you know, appearances the way that they had made appearances before, and he wanted a -- a more structured -- more structured schedule around it. You know, we had -- we had numerous conversations about things like that.

Q. Well, what did you say when she said that to you?

A. I said that, you know, the players are going to make the appearances that -- that we need them to make, and we need to strategically develop a plan to -- to -- to -- to utilize the players, but the players will make the appearances that -- that organizationally we needed them to make.

Q. Had she told you that Mr. Thomas had said to the players that they wouldn't be making any appearances?

1 MILLS

2 A. You know, there was an instance,
3 and I -- and I believe Anucha was the one
4 that brought it to my attention where
5 after -- after a really bad loss that
6 Isiah went into the locker room and told
7 the players that they weren't making any
8 more appearances.

9 As soon as that was brought to
10 my attention I had a conversation with
11 Isiah, and I said to Isiah, you know what,
12 I understand we are trying to make the
13 playoffs, and I -- I understand your point
14 of view on this -- on this particular
15 issue, but you are ending up putting
16 yourself in a bad position because I'm
17 going to tell you that the players --
18 community -- the appearances be it with
19 MSG network or be it with sponsors or be
20 it with community relations, that the
21 players are going to make the
22 activities -- the appearances that they
23 are committed to making, and, you know, he
24 said -- he said okay.

25 Q. The source of your information

1 MILLS

2 MR. GREEN: Objection to the
3 form. Asked and answered. You may answer
4 again, Mr. Mills.

5 A. Yes.

6 Q. And do you remember anything
7 that she said more specifically about it
8 other than -- other than what you've
9 already testified to?

10 A. Well, there -- the -- you know,
11 again there were -- there
12 were -- over -- over the course of time
13 there were -- were -- were many things
14 that I -- you know, I can't remember all
15 of them.

16 Q. Okay. Well, specifically on the
17 subject of Ms. Browne-Sanders' view of the
18 changes that Mr. Thomas brought to the
19 organization, other than what you have
20 said -- testified to, is there anything
21 else you recall her saying about it?

22 A. She wasn't happy with the
23 restrictions that he placed on -- on the
24 access that people had to the training
25 center.

1 MILLS

2 Q. What did she say about that?

3 A. She said that, you know, Isiah
4 has limited access to certain parts of the
5 training center to -- to only -- to only
6 members of the basketball operations
7 staff, and that she and her people needed
8 to have access to the training center
9 and -- in order to get players to do
10 certain things, and that was a problem for
11 her.

12 Q. And what did you say?

13 A. I spoke to Isiah about it, and
14 Isiah said, listen, I -- I don't care if
15 people come into the training center, you
16 know, and -- as long as they're -- as
17 they're professional and don't come in to
18 the team while they are practicing, and
19 they are not intrusive in terms of giving
20 the players room to sort of be to
21 themselves after practice, but to the
22 extent that they need to come in to get
23 things from the players or arrange for the
24 players to do that he is more than willing
25 to come up with a system to allow that to

1 MILLS

2 happen.

3 Q. Did you convey that to

4 Ms. Browne-Sanders?

5 A. Absolutely.

6 Q. And what was her response to

7 that?

8 A. She still was not -- not happy

9 that there was sort of an unfiltered

10 access to the training center, but Karen

11 Buchholz and the people -- Dan Gladstone

12 and those people who worked with her had

13 no problems interacting with the players

14 and maneuvering around the training center

15 under sort of the rules that Isiah had

16 outlined and accomplishing whatever they

17 needed to get accomplished with the

18 players.

19 Q. Anything else that you can

20 recall about conversations that you had

21 with Ms. Browne-Sanders about her views of

22 the changes that Mr. Thomas implemented

23 other than what you've already testified

24 to?

25 A. There are -- there are -- there

1 MILLS

2 are -- I can't say that I am -- that this
3 covers all of the conversations about the
4 changes.

5 Q. Well, I -- I understand that,
6 but sitting here right now have you
7 testified fully to your recollection about
8 your conversations with Ms. Browne-Sanders
9 about the changes that Mrs. -- Mr. Thomas
10 had implemented?

11 A. Well, there were -- there were,
12 you know, again -- again, there were many,
13 many, changes. There were changes
14 in -- in terms of, you know, what
15 his -- what the basketball operations role
16 was going to be in the process of -- of
17 selling -- selling tickets and
18 incorporated in -- incorporated into
19 season ticket sponsorship activities that
20 included how we would include players
21 into -- into sponsorship activity, and
22 again ways that we would systematically
23 incorporate the basketball operations
24 staff and -- and the team itself
25 into -- into business initiatives, but

1 MILLS

2 they were going -- they were going
3 to -- there was a framework that was going
4 to be around that that was -- that was
5 different.

6 Q. And you had discussions about
7 that with Ms. Browne-Sanders, her view of
8 that?

9 A. Absolutely.

10 Q. And what did Ms. Browne-Sanders
11 say?

12 A. She -- she was not happy with
13 the -- with the changes, but, you know, it
14 -- in my opinion, those were -- those were
15 the ones that I was endorsing in terms of
16 what the -- what the -- what the right
17 structure was going to be and how we
18 should view the organization, so that we
19 could move forward.

20 Q. You said that to
21 Ms. Browne-Sanders?

22 A. Yes.

23 Q. Okay. Anything else that you
24 recall about conversations that you had
25 with her about her views of the changes

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MILLS

that Mr. Thomas has -- had implemented,
anything else other than what you
can -- what you've already testified to?

A. Well, the -- I'm sure that there
is some that I am not -- that I am not
thinking of at the moment.

Q. But sitting here right now, we
have exhausted your recollection about
those discussions with Ms. Browne-Sanders?

A. Yes, there may be some that I
had that were referred to --

Q. But not right now, nothing else
comes to mind right now?

A. There -- there might be some,
but I can't think -- think of any right at
this moment.

MR. MINTZER: Okay. I think
the tape is ending. It is probably a good
time for a lunch break.

THE VIDEOGRAPHER: Okay. We
are off the record. The time is 1:06.
This is the end of tape 2.

(Luncheon recess: 1:06 p.m.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MILLS

A F T E R N O O N S E S S I O N

2:09 p.m.

THE VIDEOGRAPHER: We are back

on the record. The time is 2:09. This is
the beginning of tape 3.

S T E P H E N M I L L S, resumed.

CONTINUED EXAMINATION

BY MR. MILLS:

Q. Mr. Mills, did at any time in
2004 Ms. Browne-Sanders make you aware of
any concerns this she had had about Mr.
Thomas' conduct towards her?

A. No.

Q. Did at any point
Mr. -- Ms. Browne-Sanders tell you that
Mr. Thomas was hostile towards her --

A. No.

Q. -- in 2004?

A. No.

Q. Did at any point
Ms. Browne-Sanders tell you in 2004 that
Mr. Thomas had used inappropriate language
with her?

A. No.

1 MILLS

2 Q. Did at any point in 2004
3 Ms. Browne-Sanders tell you that Mr.
4 Thomas had used profanity while speaking
5 with her?

6 A. No.

7 Q. Did you become aware at any
8 point that Mr. Thomas had used profanity
9 in speaking with Ms. Browne-Sanders?

10 MR. GREEN: Objection to form,
11 and to the extent the witness has acquired
12 any such information only through counsel
13 and in the presence of counsel he is
14 instructed not to respond further.
15 Otherwise, he may answer.

16 A. I can't respond further.

17 Q. Did Ms. Browne-Sanders ever
18 raise any issues to you about Frank
19 Murphy's conduct towards her in 2004?

20 A. No.

21 Q. Did you -- did you ever have a
22 conversation with her about any
23 interactions that she had had with Frank
24 Murphy?

25 A. Not that I can -- no.

1

MILLS

2

Your responsibilities are the basketball

3

operations of the team. You don't have a

4

responsibility in -- in the business

5

operations of the team. You don't have a

6

say over, you know, what the game

7

presentation is. You're managing

8

the -- the infrastructure of the

9

basketball organization, the scheduling of

10

the basketball games, and Anucha is

11

responsible for the day-to-day business

12

operations. He said well, you know, I

13

thought that I had -- there was -- I had

14

more input in different places, but if

15

that's the way it is, that's the way it

16

is, and I'm -- I'm willing to move forward

17

and accept that that's the way it is.

18

Q. Did Ms. Browne-Sanders say

19

anything in the meeting?

20

A. She wanted to know how we are

21

going -- what was going to be the

22

structure in terms of moving forward, how

23

the two organizations were going to

24

function and operate, you know, together

25

and -- and Isiah designated -- he said

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

MILLS

well I don't -- I don't want to be the person that has to funnel every player request through and every time, you know, for a business initiative a player needs to go to a school or if a player needs to go on an ad sales call or if a player needs to appear in a television commercial I don't -- I am not going to be the person that each one of those individual requests come across my desk and that -- and that I am going to designate someone, the group, and it is going to be Frank Murphy as the person that is going to be my liaison with the business operations group.

Q. Was anything else said in the meeting that you recall?

A. I mean we -- we -- we probably discussed, you know, other issues in -- in the meeting, but those were clearly -- that was -- that was the focal point of the meeting of deciding -- that was the initial intent of the meeting was to, you know, establish everyone's responsibilities as -- in terms of how

1 MILLS

2 they would interact and in -- you know, to
3 really make sure that Isiah understood
4 what Anucha's role was because clearly
5 based on her request to me he didn't, and
6 so I wanted to make sure we clarified
7 that.

8 Q. And did it appear to you in the
9 meeting based on Mr. Thomas'
10 conduct -- comments that he did have some
11 misunderstanding about what
12 Ms. Browne-Sanders' role was?

13 A. I thought that -- I did sense
14 that he thought he had more of a say in
15 certain things as related to, you know,
16 that presentation and things like that,
17 but, you know, I was very clear about
18 that, and -- and at the end of the day he
19 understood what his role was, and Anucha
20 understood there was no change. She
21 understood what her role -- she -- the
22 role she thought she had was
23 reestablished.

24 Q. Did you have to step out of the
25 meeting at any point to take a phone call?

1 MILLS

2 A. Yes, I did.

3 Q. And who -- who was the phone
4 call from?

5 A. I -- I don't remember.

6 Q. Did you have any discussions
7 with Ms. Browne-Sanders after the meeting?

8 A. Yes. In fact I asked her to
9 stay -- after the meeting was over I asked
10 her to stay behind to -- to talk to me.

11 Q. And what would -- what did you
12 two discuss at that point?

13 A. I said to her that, you know, we
14 started out this meeting with you having
15 concerns about Isiah sort of overreaching
16 into your areas, and in my opinion we
17 clarified everything to your
18 understanding, and I thought in
19 the -- over the course of the meeting you
20 were overly aggressive in dealing with
21 him, that -- you know, I have to say that
22 you -- that it seemed like everything you
23 wanted coming out of this -- that you
24 wanted going into the meeting you got, but
25 I thought you were pretty -- pretty

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

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.

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

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?

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?

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

1 MILLS

2 and when they're used and how they are
3 integrated, and so there was a
4 change -- there was change versus -- there
5 was a change both organizationally. There
6 was a change both from a philosophical
7 standpoint between Scott and Isiah, and
8 she managed to get done what in my opinion
9 were the things that I was judging her on
10 in terms of what was important to get done
11 with the basketball team and the players.
12 She was able to get those done given that
13 there had been a philosophical and
14 organizational shift with Isiah Thomas.

15 Q. So she still managed to be
16 effective in her job and duties that she
17 had to perform even in light of the
18 philosophical changes that Mr. Thomas had
19 instituted; is that correct?

20 A. As it related to involving --
21 this was -- this was specifically focused
22 on -- on integrating players into
23 marketing and business initiatives.

24 Q. Were there some philosophical
25 changes that Mr. Thomas implemented that

1 MILLS

2 Ms. Browne-Sanders did not effectively
3 manage through?

4 A. You know, the -- the things were
5 effectively managed through. The -- at
6 the end of the day the things that needed
7 to be -- that I viewed as being important,
8 not necessarily what Anucha viewed as
9 being important, but ultimately as her
10 boss and the one that's making the
11 decisions on how she is being judged the
12 things that I thought were important and
13 the things that I was going to judge her
14 on were being done.

15 Q. You -- you also wrote that she
16 has managed to derive upon key player
17 involvement in team business and marketing
18 initiatives with less player availability.

19 What were you referring to
20 there?

21 A. This was a -- in this year, we
22 we were -- you know, or -- you know, this
23 covers the -- this covers -- this covers
24 the '04 year, and if you talk about the
25 '04 year, you're talking about the end of

1 MILLS

2 the '03, '04 season, and we did have a
3 situation at the end of the '03, '04
4 season where we as a team were making a
5 playoff push, and Isiah had said to me,
6 listen, you know, we are -- we -- I want
7 these guys focused on -- on making the
8 playoffs, and I really want to do less
9 things. I don't want any -- I don't want
10 these guys distracted trying to -- to make
11 the playoffs, and we are going to do two
12 or three -- fewer things so -- so in that
13 period of time, a short period of time in
14 through '04 calendar year there would have
15 been fewer player appearances.

16 Q. When was the playoff push?

17 A. It would have been in the -- it
18 it would have been in the spring.

19 Q. So between March and April?

20 A. Or it could have started as
21 early as February, but it is somewhere in
22 the -- you know, I can't remember looking
23 at the schedule when we were -- at that
24 point when we were trying to make a -- to
25 make a push.

1 MILLS

2 Q. When did Mr. Thomas tell you
3 that, that he wanted to have the players
4 really focused on basketball and not do
5 other things?

6 A. I can't remember the specifics
7 of when -- when he said it.

8 Q. Do you think it was at some
9 point in the February, March time frame?

10 A. I really can't remember
11 when -- when the conversation was.

12 Q. Is it your testimony that the
13 reduced player availability or the less
14 player availability as you wrote only
15 corresponded to the time frame of that
16 playoff push?

17 A. Well, you know, it depends on
18 how -- you know, how you view player
19 availability and how you view player
20 appearances. I don't -- I have -- I just
21 -- personally, as I judge the people
22 that -- that work for me both Anucha and
23 the people that she would judge underneath
24 her, I don't -- don't view them in an
25 absolute number of player -- player

1 MILLS

2 appearances. So if you ask me during
3 this -- during this period of time did the
4 Knicks make five more player appearances
5 than they did in another period of time, I
6 really couldn't answer it because I -- I
7 didn't look at the player appearances in
8 any sort of absolute number. I looked at
9 them in the effectiveness of what we are
10 doing.

11 Q. Mr. Mills, I am just using your
12 words and what you are talking about here.
13 That is all these questions are related
14 to.

15 So my question is that when you
16 refer to less player availability, is it
17 your testimony that that only related to
18 the time period corresponding with the
19 playoff push in the spring of 2004?

20 A. I'm telling you that that is
21 what I was referring to.

22 Q. Right. That is what I -- that
23 is what I wanted to be clear for the
24 record.

25 A. Okay.

1 MILLS

2 that she wanted to get done or there would
3 be a session that was scheduled and then
4 ultimately cancelled, and I -- I explained
5 to her that -- that, you know, at -- at
6 some point I was not going to continue to
7 be the person making the decisions or
8 ultimately having to -- to make sure all
9 of these things were executed upon, and
10 she needed to develop a strategy for
11 either herself or the people underneath
12 her to find a way to -- to get the
13 initiatives with the basketball team done,
14 and that that wasn't an efficient use of
15 my time to be the person ultimately making
16 all those decisions.

17 Q. Well, Ms. Browne-Sanders had
18 been asking you to be an intermediary and
19 to talk to Mr. Thomas about doing the
20 things that related to the business
21 activities of the team that
22 Ms. Browne-Sanders thought needed to be
23 down. Isn't that true?

24 MR. GREEN: Objection to form.
25 You may answer, Mr. Mills.

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

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

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

1 MILLS

2 or who told me that.

3 Q. The conversation in which
4 Ms. Browne-Sanders supposedly said to you
5 that she couldn't do her job any more,
6 where did that take place?

7 A. It took place in my office.

8 Q. And was anyone else present?

9 A. No.

10 Q. Was the door closed?

11 A. I believe the door was closed.

12 Q. Do you recall what day of the
13 week it was?

14 A. No.

15 Q. Can you tell me everything that
16 you recall being said in that
17 conversation?

18 A. I -- I recall her walking into
19 my office saying that we have, you know,
20 an explosive situation,
21 that -- regarding -- regarding the Knicks.
22 I can't -- you know, I've lost the
23 confidence of our staff. I can't do this.
24 I can't do this any more. I can't do this
25 job any more. I've tried every way I can.

1 MILLS

2 I have tried to be passive. I have tried
3 to be aggressive, but I can't do this, and
4 I need your help. I need to be able
5 to -- to have this job while I go find
6 another one, and I need your help, and I
7 said I understand, and then -- that
8 I -- that I would do what I could to help
9 her.

10 Q. Was anything else said in the
11 conversation?

12 A. That's -- that's the -- that's
13 what I can remember.

14 Q. Did Ms. Browne-Sanders express
15 any concerns about her security or her
16 safety during that conversation?

17 A. No, not that I can remember. No
18 -- you know, no, she didn't talk to me
19 about security or safety at that point.

20 Q. This conversation, was this at
21 or around the time that Ms. Browne-Sanders
22 had made you aware that Hassan Gonsalves
23 had been sexually harassing members of her
24 staff?

25 A. It was sometime -- sometime I

1 MILLS

2 you about Mr. Thomas' conduct at any other
3 time during her employment at MSG?

4 A. Not that I can -- not at that I
5 can recall.

6 Q. Did Ms. Browne-Sanders ever tell
7 that Mr. Thomas needed sexual harassment
8 training?

9 A. No.

10 Q. Did she ever tell you that he
11 had said that he loved her?

12 A. No.

13 Q. Did she ever tell you that
14 they -- that Mr. Thomas had suggested that
15 the two of them meet off site for any
16 reason?

17 A. No.

18 (Mills Exhibit 16 marked for
19 identification.)

20 (Document handed to witness.)

21 Q. I have given you a document that
22 -- that has been marked for identification
23 as Mills Exhibit 16, Bates stamp PL 00286.

24 Have you had a chance to look at
25 it, Mr. Mills?

1 MILLS

2 (Pause.)

3 A. Yes.

4 Q. Does this refresh your
5 recollection about the timing of when
6 Ms. Browne-Sanders sent you this E mail?

7 A. Yes.

8 Q. And you recall getting it on or
9 about December 15?

10 A. Yes.

11 Q. This is the E mail that you were
12 referring to before when you said you
13 received an E mail about -- of concerns
14 from Ms. Browne-Sanders about Mr. Thomas
15 hugging her?

16 A. Yes.

17 Q. And so the record is clear you
18 never responded to Ms. Browne-Sanders, to
19 this E mail?

20 A. The -- what I did with
21 this -- in -- what I did when I received
22 this E mail was speak to Mr. -- Mr. -- Mr.
23 Thomas and tell him that he shouldn't do
24 this.

25 Q. Right. Okay. That is quite

EXHIBIT
P

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 13, 2006
10:10 a.m.

VIDEOTAPE DEPOSITION of PETER
OLSEN, 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.

1 OLSSEN

2 Q. Did she tell you that she
3 thought Mr. Thomas was harassing her?

4 A. No.

5 Q. Did she tell you that she
6 thought Mr. Thomas needed sexual
7 harassment training -- training?

8 A. Well, she -- it is in the notes
9 I think because I think I asked her
10 something about sexual harassment
11 training, and she -- and she -- I don't
12 think she -- I know I wrote something
13 about her emphasis on it, but I
14 don't -- that would be read out of context
15 to say that she -- she didn't emphasize
16 it. She did pick up on it or mention it
17 -- something about sexual harassment
18 training, but it wasn't about her. It was
19 more broadly stated because she had
20 mentioned about Petra Pope and about, you
21 know, [REDACTED] and somewhere in there
22 was ceded [REDACTED] but nothing
23 specific about [REDACTED] It --

24 Q. Did you mention sexual
25 harassment training or did

1 OLSSEN

2 Ms. Browne-Sanders?

3 A. I think I asked because it, you
4 know, if -- if she was alluding to -- I
5 can't say this for sure, but I -- I think
6 I -- because -- a natural question would
7 be, well, if what you're saying is true, I
8 -- I think I know that the -- you know,
9 all employees receive sexual harassment
10 training. Don't they get it? Haven't they
11 had it, something to that effect, and I
12 think she somehow reiterated that maybe in
13 terms of the -- they need it. It would be
14 helpful. She didn't answer it because I
15 think I asked it more like a question.
16 Don't they get, for example, sexual
17 harassment training.

18 Q. So from what Ms. Browne-Sanders
19 was telling you, it seemed to you that --

20 MS. CACACE: Strike that.

21 Q. Did Ms. Browne-Sanders tell you
22 that she had told Mr. Mills about Mr.
23 Thomas telling her he loved her and wanted
24 to go off site with her?

25 MR. GREEN: Objection to form.

EXHIBIT Q

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

1501 Broadway
New York, New York

November 30, 2006
10:10 a.m.

DEPOSITION of MADISON SQUARE

GARDEN by HANK RATNER, one of the
Defendants in the above-entitled
action, held at the above time and
place, taken before Barbara P.

Goldsmith, a Shorthand Reporter and
Notary Public of the State of New York,
pursuant to the Federal Rules of Civil
Procedure, and stipulations between
Counsel.

1 H. RATNER
2 conversations with concerning the
3 Garden providing or potentially
4 providing security for
5 Ms. Browne-Sanders?

6 A. Steve Mills.

7 Q. And to the extent you can,
8 tell us the whole conversation you had
9 with Mr. Mills about that.

10 A. There really wasn't much more
11 to it than that. It was if she had
12 security concerns, we should look to
13 address those concerns. And then, you
14 know, it was left in Steve's hands.

15 Q. And you said, I think,
16 earlier that this is the same
17 conversation you had with Mr. Mills
18 where he came to you to say that she
19 wanted to leave?

20 A. Yes.

21 Q. So Steve told you that
22 Ms. Browne-Sanders said she could no
23 longer do her job, she wanted to leave,
24 and you embraced that and said good and
25 then said let's figure out an

1 H. RATNER

2 appropriate severance package; is that
3 correct?

4 A. Along those lines, yes.

5 Q. And then he said, oh, and by
6 the way, there are threats against her
7 or she's concerned about her safety or
8 something else?

9 MR. GREEN: Objection to
10 form.

11 A. I don't think he said oh, by
12 the way, but it was, you know, it was
13 part of the conversation that we had.

14 Q. Did you ask him from where
15 the threats were coming?

16 A. I didn't know of any threats.
17 I just know that she stated that she
18 had some concerns and my understanding,
19 whether expressed or implied, was that
20 it related to those two investigations
21 that had occurred.

22 Q. And was there anything else
23 in that conversation you had with
24 Mr. Mills that you recall that you said
25 or he said?

1 H. RATNER

2 A. I can't recall if we
3 discussed it. It was just the trying
4 to work with her to see what would best
5 work for her exiting to transition to
6 something else and whether that meant,
7 you know, staying with the company for
8 a period of time or whether it meant
9 figuring out a severance amount at that
10 point in time. But that was part of
11 the discussion and that was for Steve
12 to go and work out and figure out.

13 Q. And did you tell Mr. Mills to
14 contact a particular security company,
15 did you ask him to call security at the
16 Garden, or something else?

17 A. No, neither. I didn't make
18 suggestions along those lines.

19 Q. Did Mr. Mills give you the
20 impression that he believed the threats
21 were serious?

22 MR. GREEN: Objection to
23 form.

24 A. Yeah, I don't recall, but,
25 you know, vaguely, no, I don't think

EXHIBIT
R

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 CIV. 0589

-----x
ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

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

Defendants.
-----x

November 7, 2006
10:20 a.m.

VIDEOTAPE DEPOSITION of RUSTY
McCORMACK, 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.

1 McCORMACK

2 that with respect to the recommendations
3 for Ms. Browne-Sanders?

4 A. No, the -- again, Mark
5 Schoenfeld wrote this, but -- but
6 we -- the -- the action taken with Anucha
7 was done by Jim Dolan.

8 Q. How do you know that?

9 A. Okay. So -- well, that's the
10 word I got.

11 Q. The word you got from whom?

12 A. That I'm not sure. I don't know
13 whether it was Steve. I don't know
14 whether it was -- I don't remember that
15 exactly.

16 Q. Someone had decided --

17 A. But Jim Dolan decided to -- that
18 he was going to fire Anucha.

19 Q. Someone -- someone told you that
20 that Jim Dolan said that
21 Ms. Browne-Sanders was going to be
22 separated?

23 A. That's correct.

24 Q. Great. And then you had heard
25 that before you made this -- you signed

1 McCORMACK

2 your name to this document, McCormack 8?

3 A. Yes.

4 Q. So it's fair to say that you
5 learned about Mr. Dolan's decision, and
6 then you and Mr. Schoenfeld drafted a
7 memorandum that would conform to Mr.
8 Dolan's decision?

9 MR. GREEN: Objection to form.

10 Q. Is that accurate?

11 A. We -- yeah, we did write
12 this -- we did write this with that, yes,
13 but the decision was him. You have speak
14 to Jim.

15 Q. Did you hear about
16 Ms. Browne-Sanders' supposed desire to
17 leave the company from anyone other than
18 Steve Mills?

19 A. No, I don't believe so.

20 Q. No, you didn't hear about it
21 from anyone other than Steve Mills?

22 A. That's correct. Steve came to
23 me to discuss the possibility of her
24 continued employment while she looked for
25 work.

EXHIBIT

S

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
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

Monday, November 27, 2006

REPORTED BY:

BARBARA R. ZELTMAN

Job Number: 10954

1 ANUCHA BROWNE SANDERS

2 that what you're really saying is "I all
3 know is through my lawyer, so I can't
4 answer that."

5 Is that in effect what you are
6 saying by being quiet?

7 A My attorney is not asking me
8 to answer that question.

9 Q Unless you know something that
10 wasn't told to you by your lawyers. She
11 is saying you can't tell me if it was told
12 to you by her or Kevin or whomever.

13 But do you have any
14 information at all that would lead you to
15 be able to say that Isiah Thomas had a
16 hand in your being fired?

17 MS. VLADECK: That's a
18 different question.

19 A Yes.

20 Q Tell me about it.

21 A There were a number of things
22 that Stephon Marbury said about me. Steve
23 mentioned in a number of meetings that
24 Isiah did not like me, and that was the
25 root of hostility between Stephon and

1 ANUCHA BROWNE SANDERS

2 myself. And that Steve had mentioned in
3 one of his meetings that Isiah asked for
4 me to be fired.

5 Q Steve told you that?

6 A Yes.

7 Q Was it just you and Steve
8 present when he told you that?

9 A Yes.

10 Q Did you write that down
11 anywhere?

12 A No.

13 Q Did you tell anybody that?

14 A Yes, I told somebody. I told
15 somebody that.

16 Q Who did you tell?

17 A I remember telling my sisters.

18 Q When did you tell your
19 sisters? When did this happen?

20 A This was in 2004, the spring.

21 Q In 2004?

22 A Yes.

23 Q He asked for you to be fired?

24 A He asked Steve Mills to fire
25 me.

1 ANUCHA BROWNE SANDERS

2 Q And you told both your
3 sisters, or all three of your sisters?

4 A I told my two sisters, Ruthie
5 and Vickie.

6 Q And anything more? Anything
7 more that's the basis for your response?

8 A Yeah. Steve mentioned a
9 number of times that Isiah doesn't want me
10 around.

11 Q Doesn't want you to what?

12 A Doesn't want me around.

13 Steve mentioned that he wanted
14 me fired. There was --

15 Q That's in '04?

16 A That was in 04, yes.

17 Q And that he didn't want you
18 around was that in '04 or was it '04 and
19 '05?

20 A The discussions I had with
21 Steve with regards to him wanting me fired
22 were in spring of -- it was in March and
23 April of 2004.

24 Q And how about that he doesn't
25 want you around, when did that take place?

1 ANUCHA BROWNE SANDERS

2 A We had had discussions about
3 Isiah and more hostile conversations with
4 regards to Isiah, and he mentioned that in
5 those meetings. Steve did.

6 Q When? Time frame.

7 A I would say spring and summer
8 of 2004.

9 Q So anytime in 2005, did he
10 tell you that he doesn't want you around?

11 MS. VLADECK: Objection to
12 form.

13 A In 2005 there were -- my basis
14 for what -- the question you asked,
15 references things that were told to me
16 through other people at the Garden.

17 Q Tell me who those people were
18 and what they told you and when.

19 A Dan Gladstone.

20 Q Dan Gladstone. What did he
21 say to you and when?

22 A Dan Gladstone told me that
23 Stephon made a number of comments,
24 derogatory comments toward me, called me a
25 "black bitch."

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
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

Tuesday, November 28, 2006

REPORTED BY:

BARBARA R. ZELTMAN

JOB NO.: 10957

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

ANUCHA BROWNE SANDERS

Tape 2 of the videotaped deposition
of Browne Sanders.

Q Ms. Browne Sanders, before we
examine the next document, you testified
yesterday, did you not, that as of the
spring of 2004 and specifically March of
2004 you thought there was the possibility
you might lose your job, correct?

MS. VLADECK: Objection to
form.

A I didn't testify that I
thought I might lose my job.

Q Didn't you testify that
Mr. Mills told you that Isiah Thomas
wanted you fired?

A That's what I testified.

Q So you did testify --

A I testified that Isiah asked
Steve to fire me. And Steve said to
him -- that I said he told Isiah, "I don't
tell you who to hire and fire. Don't tell
me who to hire and fire."

So in that, it confirmed to me
that I was very safe and secure in my job.