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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 friendly terms with?

3 MS. VLADECK: Objection to  
4 form.

5 A Scott Layden, who was the  
6 general manager at the time.

7 Q When was Layden the general  
8 manager?

9 A From 2000 -- well, from when I  
10 was there, when I came in 2000, he was  
11 there as general manager. And he left in  
12 2003, at the end of 2003.

13 Q How would you describe,  
14 yourself? Would you say you were good  
15 buddies? By that I don't mean anything  
16 other than within the workplace. There's  
17 no thoughts of mine other than to ask  
18 questions relating to the workplace.

19 A We were work associates. We  
20 were also friendly.

21 Q You liked him?

22 A Yes. I respected him.

23 Q And you liked him?

24 MS. VLADECK: Objection to  
25 form.

1 ANUCHA BROWNE SANDERS

2 A And I liked him.

3 Q And would you believe that it  
4 was reciprocated?

5 A Yes.

6 Q So there was a good feeling  
7 there between you and the general manager  
8 of the Garden for several years, correct?

9 A Yes.

10 Q In addition to that, there was  
11 an assistant general manager by the name  
12 of Jeff Nix, was there not?

13 A Yes.

14 Q And Jeff also was a buddy of  
15 yours, at the workplace? At the  
16 workplace.

17 A Jeff Nix was and is a friend  
18 of mine.

19 Q And continues to be a good  
20 friend, correct?

21 A Yes.

22 Q Now, as the vice president of  
23 marketing, is it your position that you  
24 had a direct reporting relationship to  
25 Scott Layden?

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2 did or it didn't; you are saying you just  
3 don't remember?

4 A I don't recall seeing any that  
5 had my level and my peers up.

6 Q Eventually Isiah Thomas came  
7 to become general manager of the New York  
8 Knicks; is that right?

9 A Yes.

10 Q And that was in December of  
11 '03, if I'm not mistaken?

12 A Yes, it was.

13 Q And did you consider that you  
14 had had any input into the firing of  
15 Scott Layden?

16 MS. VLADECK: Objection to  
17 form.

18 A No.

19 Q Did you consider yourself as  
20 having any input into the hiring of  
21 Isiah Thomas?

22 A No.

23 Q Did you tell anybody --  
24 employee of Madison Square Garden that  
25 "we" had fired Scott Layden?

1 ANUCHA BROWNE SANDERS

2 that right?")

3 MS. VLADECK: Objection to  
4 form.

5 A No.

6 I'm confused with the  
7 question. Maybe you could restate it.

8 Q Right. I thought that --  
9 well, let me go back -- let's get off the  
10 organizational chart for just a minute.

11 Let's talk about the period of  
12 time -- which was several years, was it  
13 not? Three or two and change when Scott  
14 Layden was there, right?

15 A Closer to -- yes.

16 Q And during that time, you had  
17 quite a bit of freedom in terms of your  
18 association with Layden, did you not?

19 MS. VLADECK: Objection to  
20 form.

21 A I wouldn't say it was called  
22 freedom. We had a good working  
23 relationship. There were open lines of  
24 communication, yes.

25 Q That's a better way to put it.

1 ANUCHA BROWNE SANDERS

2 You had open lines of communication? Yes?

3 A Yes.

4 Q And you communicated with him  
5 regularly?

6 MS. VLADECK: Objection to  
7 form.

8 A Regularly, yes.

9 Q You practiced with the  
10 basketball players?

11 A Which basketball players?

12 Q The basketball players that  
13 played for the New York Knickerbockers?

14 A I've never practiced with the  
15 basketball players from the team.

16 Q Then I'm misinformed.

17 If I ask you a question in the  
18 form of a statement, if you hear my voice,  
19 probably you don't pick it up, is a  
20 question.

21 I had an impression -- and if  
22 it's a wrong impression -- but you did  
23 attend the practices, did you not?

24 MS. VLADECK: Objection to  
25 form.

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2 A I have attended practices,  
3 yes.

4 Q On a regular basis when  
5 Scott Layden was there?

6 A I would say once in a while I  
7 came up to the practice facility and  
8 watched the practice.

9 Q How often was once in a while?  
10 How many years were you there with  
11 Mr. Layden?

12 MS. VLADECK: Asked and  
13 answered.

14 A Which is the question? How  
15 often or --

16 Q How long were you there with  
17 Mr. Layden?

18 A From November 2000 to December  
19 of 2003.

20 Q Little over a year?

21 MS. VLADECK: Objection to  
22 form.

23 A No, it was more than a year.  
24 It was closer to two years.

25 Q You said November 2002?

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2 does it vary?

3 A They are away 41 games, and  
4 they are home 41 games.

5 Q So of the 41 games they are  
6 away during any particular season, during  
7 the Layden years, how often during the  
8 season would you say you went up and saw  
9 them play out of town?

10 A On a yearly basis, I would say  
11 the first year I was there probably none.  
12 Second year, maybe three different road  
13 trips I went on.

14 Q And the next year?

15 A Well, the second season -- let  
16 me restate that then.

17 The first season, probably  
18 none. The second season, maybe one. The  
19 last season, maybe three.

20 Q And what about after the  
21 ballgames, have you ever gone to the  
22 Knicks locker room after the games? In  
23 the Layden years, I'm talking about.

24 A Yeah, I went into the lounge  
25 of the players' locker room.



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2 Q Could you describe that for  
3 me, and particularly for the record, what  
4 you mean by "the lounge"?

5 A Yes. There are multiple  
6 entrances into the locker room. One  
7 entrance opens up into a lounge with  
8 couches and a television. And that's the  
9 area of the locker room that I was in.

10 Q And how often would you go to  
11 the lounge in the Layden years? And I  
12 understand it can vary. I understand it's  
13 an approximation. And I am not holding  
14 you to the number. I'm just trying to get  
15 a sense.

16 A I'm trying to understand.  
17 How often after the games?

18 Q After the games.

19 A I might go in there after each  
20 game, either that or I stand outside the  
21 door and talk.

22 Q And what about in the  
23 Isaiah Thomas years until you left the  
24 company?

25 A There were times that I went

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2 into the locker room. It was less  
3 frequent.

4 Q And how about the practice  
5 facility under Isiah Thomas?

6 A Very rarely.

7 Q And how about -- well, you  
8 only --

9 A Let me clarify that.

10 I went up to the practice  
11 facility when we had events that were  
12 taking place there and if there was a need  
13 to go up there to meet with somebody.

14 Q I don't mean outside of the  
15 times when the team was practicing.

16 When the team was practicing,  
17 I believe you said that under Layden you  
18 went approximately three times at the  
19 most; is that right?

20 MS. VLADECK: Objection to  
21 form.

22 A Well, then, I should clarify  
23 that because, under Layden, I probably sat  
24 through three practices or so.

25 Q That's what I'm saying.

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2 Three.

3 A Right. But there were player  
4 events. The player events also were times  
5 that there were teams were practicing.  
6 They would usually practice, and then  
7 you'd have the player -- the event. So  
8 there could have been more times.

9 Q Did Isiah Thomas, when he  
10 came, change the rules at all about  
11 attending -- persons who were not on the  
12 team attending practices?

13 MS. VLADECK: Objection to  
14 form.

15 Q If you know.

16 A I don't recall him doing  
17 something that was official.

18 Q I suppose there's a lot of  
19 ways to get your point across, but did he  
20 get the point across that persons who  
21 weren't members of the team weren't  
22 welcome at the practice facility when the  
23 team was practicing?

24 A He never said anything  
25 directly to me. It never was communicated

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2 object and say that she answered.

3 A I did answer your question.

4 Q What about in terms of

5 traveling with the team to away games?

6 Did that change at all under Isiah Thomas?

7 A It changed. It wasn't an

8 official mandate, but it changed.

9 Q And the same thing, you felt  
10 you needed to stay away?

11 MS. VLADECK: Objection to  
12 form.

13 A I made some choices to travel  
14 less with the team.

15 Q Did you travel at all with the  
16 team?

17 A I recall a road trip. Maybe a  
18 road trip. I am not sure. I don't  
19 remember.

20 Q When was that?

21 A It had to be early on.

22 Q And after that, you didn't  
23 travel with the team at all, correct?

24 A If I traveled with the team,  
25 it wasn't on the team plane, but there

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2 were times where I would meet the team in  
3 a city.

4 Q And what about the lounge of  
5 the players' locker room, was your  
6 attendance there reduced, too, under  
7 Isiah?

8 A There were times when I went  
9 in. You know, there wasn't -- there were  
10 times I went into the locker room, same  
11 area. It didn't necessarily change for  
12 me.

13 Q Well, Isiah came to the  
14 team -- correct me if I'm wrong -- I  
15 believe it was December of 2003; is that  
16 right?

17 A Yes.

18 Q Were you sad to see  
19 Scott Layden go?

20 A I was sad for him.

21 Q Were you glad to see  
22 Isiah Thomas coming?

23 A I was happy for the Garden.

24 Q How about for yourself, did  
25 you see that as a positive in any way?

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2 A On what?

3 Q Any example that you want. If  
4 something happens that's disturbing to  
5 you, you call it to the attention of  
6 Steve, not employee relations, and it  
7 doesn't clear itself up to your  
8 satisfaction.

9 What, if anything, did you do?

10 A I left it to Steve Mills.

11 Q Always left it to Steve?

12 A Yes.

13 Q So during the course of your  
14 employment by the Garden while  
15 Isiah Thomas was there, you went to  
16 Steve Mills and complained about Isiah on  
17 several occasions, did you not? Without  
18 quantifying the number. We'll get to  
19 that.

20 A Yes.

21 Q And each time, after you spoke  
22 to Steve Mills, was your disturbance or  
23 your grievance satisfied, so far as you  
24 were concerned?

25 MS. VLADECK: Objection to

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2 form.

3 A Not necessarily, no.

4 Q Was it ever satisfied so far  
5 as you were concerned?

6 A No.

7 Q So, then, in all the two years  
8 that -- give or take an hour or two --  
9 that you were there while Isiah Thomas was  
10 there, none of your complaints about  
11 disturbances concerning Isiah were ever  
12 satisfied, so far as you were concerned,  
13 by Steve Mills; is that right?

14 MS. VLADECK: Objection to  
15 form.

16 A I guess I wouldn't  
17 characterize it as "satisfied." I might  
18 characterize it differently.

19 Q How would you characterize it?

20 A There was one occurrence where  
21 Steve called a meeting and we met in his  
22 office as a result of what I communicated  
23 to him.

24 Q Was that in -- an incident in  
25 March of '04?

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2 A Yes.

3 Q Other than that, what's the  
4 answer to my question? I could repeat it  
5 for you if you want me to.

6 MS. VLADECK: Why don't you  
7 rephrase it.

8 MR. PARCHER: Say again.

9 MS. VLADECK: Why don't you  
10 rephrase it since she had trouble  
11 with the words you used.

12 MR. PARCHER: I'll ask the  
13 question, and then I'll rephrase it.  
14 I'm not in sync with what you are  
15 asking me to do.

16 Q You understand what I'm  
17 asking?

18 A I said "satisfied," I wouldn't  
19 call -- I wouldn't use the word satisfied.

20 Q What word would you use?  
21 Properly resolve? Help me. Tell me.

22 A The fact that he might have  
23 taken some action, I guess. The fact that  
24 he took some action doesn't necessarily  
25 mean that the event was satisfied.



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2 into a room in that same area and began to  
3 yell at me and say that we weren't doing  
4 anymore "fucking events." He said, "You  
5 don't run this team. I run this team."  
6 He called me a "fucking bitch." He was  
7 spewing curses.

8 Q Spewing curses?

9 A Spewing curses.

10 And I told him that these  
11 events were either League mandated or we  
12 were under contractual obligations to  
13 sponsors and, if he had problems, he  
14 should really talk to Steve about it.

15 Q I have -- I don't know if it's  
16 to scale or anything like that. But I  
17 have a drawing of what I think is the part  
18 of the Garden that you were referring to.  
19 And I am not claiming to you -- and more  
20 particularly to your lawyer because I  
21 don't want to face the objection to form  
22 if I can avoid it -- that it's to scale or  
23 that it's perfect.

24 But I will represent to you  
25 that it's, I think, reasonably accurate,

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2 Q Sorry?

3 A I said he pulled me into the  
4 room.

5 Q Okay. And he opened the door?

6 A Yes.

7 Q And inside the room, did he  
8 close the door?

9 A Yes, he did.

10 Q Bang it or shut it softly or  
11 how did he close it?

12 MS. VLADECK: Objection to  
13 form.

14 A He just closed the door.

15 Q Let go of your arm?

16 A Yes.

17 Q Now, in this Complaint -- I'm  
18 reading it to you -- you say, "He yelled  
19 that the team was not going to do anymore  
20 F-ing events. Browne Sanders calmly told  
21 Thomas that we require the Knicks to do  
22 community events and that he  
23 should discuss his concerns with Mills.  
24 Thomas continued to scream at  
25 Browne Sanders calling her a F-ing bitch,

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2 A His name is Gary Winkler.

3 Q Why did you ask Gary Winkler  
4 in November of '05 to reconstruct an event  
5 that had happened over a year earlier?

6 MS. VLADECK: Objection to  
7 form.

8 A I wanted to make sure I had a  
9 record of it, as I was demanding that  
10 Steve deal with things.

11 Q Didn't you have some desire to  
12 make sure that you had a record of this  
13 arm-pulling/screaming incident so that  
14 Steve could deal with things in November  
15 of '05?

16 MS. VLADECK: Objection to  
17 form.

18 A Not necessarily, no. Either  
19 it was something that happened to me that  
20 I recalled.

21 Q Was it important to you, as  
22 you did with Winkler and Petra Pope, to go  
23 around to the different people that might  
24 have been in the corridor that night and  
25 say, "Did you see Isiah pulling me"? That

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2 Q Probably or definitely?

3 A On more than one occasion.

4 Q Probably or definitely?

5 MS. VLADECK: Objection to  
6 form.

7 A I'm answering your question.

8 You asked me if I used profanity in the  
9 workplace and you asked me if I used it on  
10 more than one occasion. And I have said I  
11 have used profanity in the workplace on  
12 more than one occasion.

13 Q How many times would you say  
14 you used it, approximately, in all the  
15 years you were there at the Garden?

16 A I don't know. I didn't keep  
17 count. It wasn't a lot.

18 Q I don't know what you mean, to  
19 quote your lawyer, as "a lot"?

20 MS. VLADECK: Objection to  
21 form. Is there a question?

22 Q Whatever you mean by that,  
23 give it an approximate number.

24 MS. VLADECK: Objection to  
25 form.

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2 A It's tough to quantify it. I  
3 would say little less than ten times.

4 Q So in the -- how many years  
5 were you at the Garden? Approximately  
6 five?

7 A Approximately five, little  
8 over five before I was fired.

9 Q In the approximate little over  
10 five, you've used profanity in the  
11 workplace probably less than ten times?

12 A Yes.

13 Q Okay. Just asking. Get the  
14 record clear.

15 Any other profanity incidents  
16 that you recall involving Isiah?

17 MS. VLADECK: Objection to  
18 form.

19 And other people?

20 Q And other people. Same  
21 question as before.

22 A There were times where he used  
23 profanity in our staff meetings.

24 Q When?

25 A A few that he went to.

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2 form.

3 A It varied. There was some  
4 meetings where he just used profanity.  
5 There were others where he was directing  
6 it at me and he called me a "fucking  
7 bitch."

8 Q On one or more than one  
9 occasion in those five or six meetings?

10 A I would say on more than one  
11 occasion. In those five or six meetings,  
12 it was probably three times. But when he  
13 started this cursing, he was spewing  
14 curses. So it was a mixture of he was  
15 referring to the situation and then he was  
16 referring to me.

17 Q Did you go back to Mills and  
18 report to him and tell him what was going  
19 on?

20 A Yes.

21 Q At the weekly meetings, or  
22 right after it happened?

23 MS. VLADECK: Objection to  
24 form.

25 A It depended on the event.

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2 There were times I went to him right  
3 after. And as I said earlier, I was  
4 trying not to be in his office complaining  
5 all the time.

6 Q Leaving that aside, what you  
7 were trying not to do, I'm getting an  
8 impression that five or six times you went  
9 into this man's office and he was cursing  
10 at you all the time and making it very  
11 unpleasant and uncomfortable and miserable  
12 for you, right?

13 MS. VLADECK: Objection to  
14 form.

15 A It wasn't always in his  
16 office. Sometimes it was in the  
17 conference room. But yes, that's  
18 accurate.

19 Q But that's accurate, right?  
20 And very, very different than  
21 the way it was under Scott Layden, right?

22 A It was different, yes.

23 Q Where you were very  
24 comfortable in having these interactions  
25 with the general manager under Layden,

1 ANUCHA BROWNE SANDERS

2 weren't you?

3 MS. VLADECK: Objection to  
4 form.

5 A I was comfortable with Scott,  
6 yes.

7 Q Now, did you go into Mills at  
8 any time -- this is in the February, March  
9 period -- and say -- not in exact words  
10 but in concept -- "This is impossible, I  
11 can't talk to the man. Every time I talk  
12 to the man he's cursing at me"?

13 A I made Steve very much aware  
14 of it, and I did complain. I said, "This  
15 is not a comfortable environment. He  
16 can't just curse me out." And I made it  
17 very clear to him, especially the evening  
18 of March 23rd, that this -- it could not  
19 continue like this. This is absolutely  
20 outrageous.

21 Q Before March 23, had you made  
22 it clear to him that it could not  
23 continue, that it was outrageous?

24 A Yes, I did.

25 Q So March 23rd was just a



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2 culmination of that period; it wasn't the  
3 first time you made it clear, right?

4 A I think after he called me a  
5 "fucking bitch" and "ho," it made it very  
6 clear to me that Steve had to step in.

7 Q Was that the March 23rd  
8 incident or the incidents before?

9 A The "fucking bitch" or the  
10 "ho."

11 MS. VLADECK: Objection to  
12 form.

13 Q It isn't so much of the words.  
14 I am not minimizing the words.

15 But it isn't so much the  
16 words, as to cursing at you as  
17 distinguished from using profanity.

18 You make that distinction,  
19 right?

20 MS. VLADECK: Objection to  
21 form.

22 A I'm sorry. I didn't  
23 understand.

24 Q Well, when the man says "what  
25 the fuck am I doing here" or words to that

1 ANUCHA BROWNE SANDERS  
2 the policy relating to harassment and  
3 discrimination and things like that?

4 MS. VLADECK: Objection to  
5 form.

6 A I became familiar through some  
7 of their -- they had some training.

8 Q And did you take the training?

9 A I took one of the trainings,  
10 yes.

11 Q On one or more than one  
12 occasion?

13 A The one I recall was the one I  
14 took, I think, in the fall -- summer/fall  
15 time frame of 2005, was the one that I  
16 recall.

17 Q You only recall one?

18 A Sitting through sexual  
19 harassment training. There was one that  
20 was an online course that I took.

21 Q But in the years of 2000,  
22 2001, 2002, 2003, 2004, you don't recall  
23 ever attending any type of meeting or  
24 conference or anything where --

25 A There were meetings.

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2 answered. Objection to form.

3 A No, there was nothing that  
4 prevented me from writing things down.

5 Q And Steve Mills, when he told  
6 you not to -- these are my words. I'm  
7 forgetting words you used -- you know,  
8 take it elsewhere other than him, when he  
9 told you not to do that, he wasn't  
10 directing you not to write things in your  
11 diary, was he?

12 MS. VLADECK: Objection to  
13 form. Asked and answered.

14 A I didn't interpret that.

15 Q Right. Now, were you  
16 familiar --

17 What's funny about that?

18 A Are you okay?

19 Q You sincerely want to know the  
20 answer to that? I'm okay. Thank you for  
21 asking. I appreciate it. That was very  
22 kind of you.

23 When you got to the Garden,  
24 and throughout the years that you were  
25 there, did you become at all familiar with

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2 paragraph.

3 Q She said it was clear that  
4 Isiah Thomas wanted her to flirt with the  
5 officials on a regular basis.

6 That's what she said to you?

7 A Yes.

8 Q Now, if she were to testify  
9 that she didn't say any such --

10 Was there a witness to that,  
11 by the way?

12 A To her telling me this?

13 Q Yes.

14 A At the time, no. But  
15 Gary Winkler also confirmed it because she  
16 had told Gary.

17 Q Let's take a look at Gary  
18 Winkler's e-mail to you.

19 You asked him to write, did  
20 you not, on or about sometime in  
21 December 15th of '05?

22 MS. VLADECK: Objection to  
23 form.

24 A Yes.

25 Q Now, by December 13th of '05,

1 ANUCHA BROWNE SANDERS

2 you had a lawyer, did you not?

3 A By December 13th?

4 Q Yes.

5 A I think so.

6 Q Who is Robert Levy?

7 MS. VLADECK: I am going to  
8 direct her not to answer to the  
9 extent she only knows through  
10 counsel.

11 (Directive to witness.)

12 MR. PARCHER: I have far too  
13 much respect for you to say what on  
14 earth are you talking about. So I'm  
15 just going to say -- I'll try to  
16 figure out what you mean. But you,  
17 obviously, by the look on your face,  
18 are on pretty solid ground here. So  
19 I'll proceed cautiously. I'll see if  
20 I can't get to the real truth here.

21 Q Did you ever speak to  
22 Robert Levy?

23 A No, I didn't.

24 Q Never in your lifetime?

25 A I don't recall Robert Levy.

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2 to figure it out.

3 Q And you looked it up for the  
4 first time, found out what was going on  
5 with you, on October 29, 2005, right?

6 MS. VLADECK: Objection to  
7 form.

8 A That was the first time I  
9 looked it up, yes.

10 Q And it was in November, was it  
11 not, around Thanksgiving time that you  
12 caused people in your office that worked  
13 under you to write up -- to investigate or  
14 write up a report about these two young  
15 men, Gonsalves and Vernon Manuel, right?

16 MS. VLADECK: Objection to  
17 form.

18 A At Steve's direction, yes.

19 Q At Steve's direction?

20 A Yes.

21 Q Had something happened to  
22 precipitate that?

23 MS. VLADECK: Objection to  
24 form.

25 A I think something did happen.

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2 answer? Never mind. I'll go at it a  
3 different way.

4 Q In November, you got a series  
5 of reports and conducted an investigation  
6 that culminated in your asking someone at  
7 the Garden to let go of two people, right?

8 MS. VLADECK: Objection to  
9 form.

10 A Yes.

11 Q And who were those two people?

12 A Vernon Manuel and  
13 Hassan Gonsalves.

14 Q And who is the third person's  
15 whose name you mentioned before?

16 A Tasheem Ward.

17 Q You didn't ask for him to be  
18 fired?

19 A No, I don't recall asking  
20 about him.

21 Q So just referring to the two  
22 young men that you asked to be fired, they  
23 had been troublesome for you since way  
24 back in '04, had they not?

25 A Yes.

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2 Q And there were all kinds of  
3 incidents -- without characterizing and  
4 serializing and showing you documents --  
5 that occurred, relating to them, in '04 as  
6 well as in '05, right?

7 A In '03, '04 and in '05.

8 Q What were some of those  
9 incidents, if you can tell us, to the best  
10 of your recollection.

11 A Vernon had consistently had  
12 hostile confrontations with people in the  
13 office, including myself. He was  
14 disrespectful. He, on occasion, did not  
15 show up for events, didn't show up to the  
16 office. Was very argumentative. Had a  
17 lot of demands and was insubordinate to  
18 his manager, to managers above him. So  
19 that was an ongoing problem with Vernon.

20 Q And what about the other  
21 fellow? Gonsalves.

22 A Hassan was -- I guess I would  
23 characterize him as someone who really  
24 didn't perform in his job function. And  
25 he was also sexually harassing women on



1 ANUCHA BROWNE SANDERS

2 the staff.

3 Vernon was verbally hostile to  
4 women on the staff.

5 Q Did they also -- phony  
6 invoices?

7 A Yes, I think Vernon forged his  
8 manager's signature 20 or 30 times, and  
9 Hassan forged his manager's signature over  
10 80 times.

11 Q They did something  
12 inappropriate about parking spots?

13 MS. VLADECK: Objection to  
14 form.

15 A That's the same thing.

16 Q Wasn't anything to do with  
17 expense vouchers or anything like that?

18 A That's what I was referring  
19 to.

20 Q Only parking?

21 A Expense -- well, the parking  
22 expense. The parking expense that you  
23 sign off on it.

24 Q But nothing beyond parking?

25 A In terms of signing things?

1 ANUCHA BROWNE SANDERS

2 around Thanksgiving time?

3 MS. VLADECK: Objection to  
4 form.

5 A Why did what have to be done  
6 around Thanksgiving time?

7 Q Doing this investigation and  
8 writing up the careful reports that you  
9 got written up?

10 MS. VLADECK: Objection to  
11 form.

12 A "Careful reports." I guess I  
13 need to know what you are referring to.

14 MR. PARCHER: Okay. Let's  
15 pull them.

16 Q Did you go to any other lawyer  
17 before going to Ms. Vladeck to consult  
18 about these issues that you sued on?

19 MS. VLADECK: Yes or no. You  
20 can just answer yes or no.

21 A No. I didn't see anybody  
22 else.

23 Q And Ms. Vladeck was  
24 recommended to you by Karen Buchholz?

25 A Yes.

1 ANUCHA BROWNE SANDERS

2 Q And she was recommended by  
3 Karen Buchholz at the same time that you  
4 were conducting these investigations,  
5 right?

6 MS. VLADECK: Objection to  
7 form.

8 A I think at the very end of  
9 them. It was as a result -- it was at the  
10 end of the investigations.

11 Q Did you ask Karen to recommend  
12 a lawyer to you?

13 A Karen volunteered that  
14 information to me.

15 Q You brought Karen to Anne as  
16 well, didn't you?

17 MS. VLADECK: Objection to  
18 form.

19 A Karen asked to come with me.

20 Q She made a request?

21 A She wanted to come with me.

22 Q You didn't pressure her?

23 A No, I didn't.

24 Q Did you tell her that she had  
25 been sexually harassed, too?

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.

1 ANUCHA BROWNE SANDERS

2 with him. He said he wanted to spend some  
3 time with me privately.

4 Q What was the first one?

5 A That was the first one.

6 Q You said something before  
7 off-site.

8 A No, that was it.

9 MR. PARCHER: Could you read  
10 it back.

11 (Requested portion of record  
12 read: "A. One was Isiah asked me  
13 what I thought of his staff. He also  
14 asked me in that same meeting if I  
15 would go off-site with him. He said  
16 he wanted to spend some time with me  
17 privately.")

18 Q So where did this meeting take  
19 place?

20 A That meeting took place in his  
21 office.

22 Q At the Garden?

23 A At the Garden.

24 Q Anybody else present?

25 A No. Not in that meeting, no.

1 ANUCHA BROWNE SANDERS

2 Q Any witnesses?

3 A No, not that I know of.

4 Q Any e-mails or other writings  
5 on your part?

6 A About this request to go  
7 off-site?

8 Q Well, about that meeting that  
9 you say you had in his office between  
10 December and March?

11 A I told Steve about that  
12 meeting.

13 Q Okay. But Steve wasn't a  
14 witness. Steve is a witness to what you  
15 said.

16 But there was no witness to  
17 whatever the conversation was; am I  
18 correct?

19 A Not that I know of. I don't  
20 think there were.

21 Q It's not in your diary?

22 A I don't think so.

23 Q What were you doing in a man's  
24 office by yourself?

25 A Did you ask me what I was

1 ANUCHA BROWNE SANDERS

2 doing in a man's office?

3 Q In that man's office.

4 A You did say "a man's office."

5 Q I didn't say it, and if I did  
6 say it, I didn't mean it. I mean what I  
7 say.

8 And what I'm saying to you is  
9 in that man's office. I don't see any  
10 problem with you going into a man's  
11 office, unless you see a problem with it.  
12 I don't see a problem with it.

13 I am talking about Isiah  
14 Thomas, the man you are accusing of having  
15 cursed at you, right, unremittently for  
16 approximately a year, without stop, and  
17 then, came up to you bizarrely, put his  
18 arm around you and told you that he loved  
19 you.

20 I'm asking you what you were  
21 doing in that man's office by yourself?

22 MS. VLADECK: Object to form.

23 Argumentative.

24 Do you have a question without  
25 a preamble?

1 ANUCHA BROWNE SANDERS

2 MR. PARCHER: That's my  
3 question.

4 MS. VLADECK: Object to form.  
5 And I think it's improper.

6 A To answer your question and  
7 just to clarify.

8 I didn't say that he loved me.  
9 He said he was in love with me.

10 Q In love with you.

11 A Yes.

12 Q Did you believe him?

13 MS. VLADECK: Asked and  
14 answered.

15 A Didn't know what to think.  
16 Didn't know what to think.

17 Q There's a chance that he meant  
18 it, in your mind?

19 A He could have. I am not  
20 psychoanalyst. I am not trying to read  
21 what he's thinking.

22 Q Have you been to a  
23 psychoanalyst?

24 MS. VLADECK: I direct her not  
25 answer.



1 ANUCHA BROWNE SANDERS

2 (Directive to witness.)

3 MR. PARCER: On what grounds?

4 MS. VLADECK: It has no  
5 relevance to this case.

6 MR. PARCER: I think it does.

7 You directed her not to  
8 answer?

9 MS. VLADECK: Correct.

10 A I was still responsible for  
11 moving forward the business and keeping  
12 him updated. There was a reason why I was  
13 in his office. I don't recall why I was  
14 in his office the day he asked me to go  
15 off-site with him.

16 Q I thought the whole idea was,  
17 starting back in March of '04, that you  
18 were to go through Murphy.

19 Wasn't that the whole point of  
20 the Mills/Thomas meeting in March of '04?

21 MS. VLADECK: Objection to  
22 form. Mischaracterizes the  
23 testimony.

24 A The meeting that I had with  
25 him in Steve's office, he directed me not

1 ANUCHA BROWNE SANDERS  
2 to speak to his staff, his basketball  
3 operations staff, and players, and he said  
4 if I had any request to go through Frank  
5 Murphy? He didn't direct me not to speak  
6 to him.

7 Q I see.

8 So you comfortably went into  
9 his office sometime when? When did this  
10 meeting take place?

11 MS. VLADECK: Objection to  
12 form. Mischaracterizes the  
13 testimony.

14 A Can you please ask that again?

15 Q When did the meeting take  
16 place that we're talking about now?

17 A In early 2005.

18 Q That would be January, when  
19 you say "early"? January or February?

20 A It was January/February, yes.

21 Q Is there a reason why you  
22 didn't write it down in your diary?

23 A Some things I wrote down, and  
24 some things I didn't.

25 Q That's the only reason you

1 ANUCHA BROWNE SANDERS

2 could give me, right?

3 A Yes.

4 Q And he's asking you what he  
5 thinks of his staff?

6 MS. VLADECK: Objection to  
7 form.

8 A He is asking me what I think  
9 of his staff.

10 Q Correct.

11 A That was something he asked  
12 me, yes.

13 Q And in the context of that  
14 conversation, he says, "I would like to  
15 meet you off-site to plan"?

16 A He wants to go off-site with  
17 me. He wants to spend private time with  
18 me.

19 Q He wants to spend private time  
20 with you?

21 A Yes.

22 Q Did he say the words "to  
23 plan"?

24 A No, he didn't.

25 Q He didn't use the words "to

1 ANUCHA BROWNE SANDERS

2 Q At Gate 1?

3 A At Gate 1.

4 Q So the world was there to see,  
5 if they wanted to?

6 A To see?

7 Q To see. If anybody looked  
8 over at Gate 1, can see what was going on?

9 A Yes, they could see me and  
10 Isiah standing next to each other.

11 Q And at this time, he also  
12 tells you that he's in love with you?

13 A Yes.

14 Q And -- but this time he says  
15 to you, "I know you think I'm  
16 inappropriate," right?

17 A Yes.

18 Q And this all starts by  
19 referring to the scar that he has, and  
20 frankly, I can't notice it from this  
21 distance.

22 But apparently you have a  
23 scar, too, over one of your eyes?

24 A He started by saying he  
25 noticed a scar over my eyebrow, yes.



## CABLEVISION'S POLICIES

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### Harassment Prevention Policy

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OUR COMPANY HAS a zero tolerance policy against harassment, discrimination or other improper conduct on the basis of sex, race, color, age, national origin, citizenship, marital or domestic partner status, veteran status, sexual orientation or preference, religion or religious creed, ancestry, physical or mental disability or handicap or any other characteristic protected by law. This conduct is prohibited in the workplace.

Cablevision requires that managerial and supervisory employees be diligent in addressing and preventing such conduct. Any managerial or supervisory employee who receives a complaint about, becomes aware of, or observes conduct that is or could be considered harassing, discriminatory, improper, inappropriate, or in violation of this policy, is required to promptly report such complaint or conduct to Employee Relations.

We require that everyone refrain from conduct that is, or could be considered, harassing or discriminating. Consequently, this policy against sexual and other harassment, discrimination and other abusive conduct applies to conduct by our employees toward their co-workers as well as conduct by or toward our customers, consultants, suppliers or visitors.

Prohibited practices include the following:

- (1) abusing the dignity of an employee, co-worker, consultant, supplier, customer or visitor through unwelcome, insulting, degrading or otherwise offensive remarks or conduct;
- (2) engaging in conduct or making remarks that are unwelcome, insulting, degrading to otherwise offensive to or about an employee, co-worker, consultant, supplier, customer or visitor;
- (3) unreasonably interfering with an employee's work performance or creating an intimidating, hostile, humiliating or otherwise offensive work environment by, for example, engaging in:
  - offensive or unwelcome sexual flirtations, advances, or propositions;
  - verbal or non-verbal abuse of a sexual, racial or ethnic nature or based on another characteristic protected by law;
  - vulgar comments or gestures about an individual's body or physical or mental attributes;



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MSG 12852

- the use of sexually, racially, ethnically or otherwise degrading words or gestures to describe an individual or an individual's group;
  - the display, in our workplace, of sexually suggestive or offensive objects or pictures; or
  - the distribution of sexually explicit or otherwise abusive or offensive e-mail, voice mail or other communications which show hostility or aversion toward an individual or group because of certain personal characteristics protected by law.
- (4) retaliating against an employee for complaining about harassing or discriminatory behavior, or for furnishing information or participating in any manner in any investigation of such behavior; and
- (5) requiring submission by customers, visitors, consultants or suppliers to any of the foregoing behaviors as a condition of doing business with Cablevision.

We want all employees to know they can work in security and dignity and need not endure unwelcome, degrading, unprofessional, abusive or exploitative treatment or conduct. Submission to unwelcome conduct or any form of harassment and/or discrimination is not and never will be a term or condition of your employment with Cablevision.

Cablevision considers harassment, discrimination and abusive conduct to be serious misconduct. They are also unacceptable in the workplace. Any employee found to have harassed, discriminated against, or been abusive or insulting toward another employee or to a customer, consultant, supplier, visitor or other person covered by this policy will be subject to corrective action, up to and including suspension and/or termination of employment.

#### COMPLAINT PROCEDURE

##### IMPORTANT NOTICE TO ALL EMPLOYEES:

Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. If you believe you have been or are being discriminated against, harassed or otherwise treated improperly, or believe some other employee is engaging in or receiving such treatment or conduct, you should contact your local Employee Relations Manager immediately. The local Employee Relations Manager has the primary responsibility for investigating and resolving any complaint of sexual or other harassment, discrimination or other improper or abusive conduct.

If you believe it is more appropriate given the particular circumstances, you may contact Corporate Employee Relations to report your complaint. Please also feel free to contact the following persons directly: Robert Doodian, Vice President, Employee Relations & Staffing at (516) 803-3140 for Corporate, Rainbow and Lightpath, Sue Crickmore, Vice President, Employee Relations Policy & Operations at (516) 803-4061 for Cable & Communications and

John Moran, Vice President, Employee & Labor Relations at (212) 465-6775 for MSG, Radio City Music Hall and Hartford Civic Center.

If you have not received a satisfactory response within five (5) business days after reporting any incident, which you perceive to be harassment, discrimination or abusive conduct, please immediately contact any member of our CEO's staff who will ensure that an investigation is immediately conducted.

All complaints will be fully and promptly investigated and, where necessary, appropriate corrective action or other steps will be taken. Such action may include counseling, informal or formal reprimands, written or verbal warnings, suspension, reduction in pay, reduction in duties, transfers, and other formal sanctions, up to and including termination of employment.

All actions taken to investigate and resolve such complaints will be conducted in confidence to the greatest extent possible. There will be no retaliation for raising or pursuing such complaints. When we have completed our investigation, we will inform the person filing the complaint of the completion of the matter.

**RETALIATION IS PROHIBITED**

Cablevision will not in any way retaliate, nor permit any Cablevision personnel to retaliate, against anyone who makes a complaint or report of harassment or discrimination, or participates in the investigation of such a complaint or report. Conduct of this nature is a serious violation of this policy and will itself result in disciplinary action against any individual who engages in such conduct.

Revised: October 2004

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MSG 12854



RECEIPT OF CABLEVISION'S HARASSMENT PREVENTION POLICY

Having received and read through Cablevision's policy prohibiting sexual and other harassment and discrimination, I fully understand my obligation to comply with this policy. I understand that I will be subject to corrective action up to and including termination of my relationship with the Company if I do not comply with this policy.

Employee Name

\_\_\_\_\_  
(please print)

Employee Signature

\_\_\_\_\_  
Date: \_\_\_\_\_

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MSG 12855

From: Browne Sanders, Anucha  
 Sent: Monday, November 28, 2005 1:02 PM  
 To: Mills, Steve  
 Subject: RE: Hassan Gonsalves

Hi Steve,  
 I just met with [REDACTED] to ask her specifically what her experience has been with Hassan Gonsalves. [REDACTED] said that she has become very uncomfortable with Hassan. Here are some of the comments that were said to her by Hassan:  
 "I want you to fuck me. When are you coming to my apartment"  
 "I want you to suck my dick"  
 "I talked to Stephon and he said to tell you to stop playing"  
 This past weekend Hassan sent [REDACTED] a text message which said "When can I stick it in"

I would like to terminate Hassan today. He will be here this afternoon at 5:00 pm.

-----Original Message-----

From: Browne Sanders, Anucha  
 Sent: Monday, November 28, 2005 12:31 PM  
 To: Mills, Steve  
 Subject: Hassan Gonsalves

Steve

Need to address some issues that I discussed with you regarding Hassan. It was brought to my attention that he has made a number of inappropriate comments to women on the staff.

To [REDACTED] Sat in her office cube and said "I hear you give good head"  
 Hunter brought this to my attention this morning as [REDACTED] told him last week. A number of other things have been said to [REDACTED] This one was specifically brought to Hunter's attention last week.

To [REDACTED] "You look good, you look good, I bet that pussy is good too"  
 [REDACTED] brought this to Karin Buchholz's attention and Karin relayed it to me this morning. [REDACTED] said that if it were anyone else, she would have said something sooner but since it was Stephon's cousin, she didn't feel that she could say anything.

[REDACTED] has told me that he put his hands on her waist and her leg and she told him to keep his hands off of her.

A member of the [REDACTED] brought to my attention that Hassan routinely rolls down the windows of the Groove Truck and give "cat calls" to women on the street.

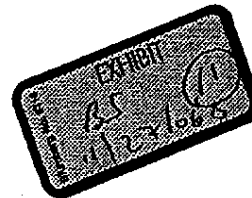
Other members of the staff (Dan Gladstone, Courtney Carter) have said that Hassan routinely says that he can do anything he wants and that if he doesn't like something all he needs to do is call Isiah or Steve and he gets whatever he wants.

Steve, I have a meeting with you this afternoon. Let's discuss how we should proceed.

Thank You

Anucha Browne Sanders  
 Senior Vice President  
 Marketing and Business Operations  
 New York Knicks  
 212-465-6432

REDACTED



MSG 00250

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From: Browne Sanders, Anucha  
 Sent: Monday, November 28, 2005 2:49 PM  
 To: Moran, John VP ER MSG  
 Subject: FW: Hassan Gonsalves

REDACTED

-----Original Message-----

From: Browne Sanders, Anucha  
 Sent: Monday, November 28, 2005 1:02 PM  
 To: Mills, Steve  
 Subject: RE: Hassan Gonsalves

Hi Steve,  
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A member of the [REDACTED] brought to my attention that Hassan routinely rolls down the windows of the Groove Truck and give "cat calls" to women on the street.

Other members of the staff (Dan Gladstone, Courtney Carter) have said that Hassan routinely says that he can do anything he wants and that if he doesn't like something all he needs to do is call Isiah or Steve and he gets whatever he wants.

Steve, I have a meeting with you this afternoon. Let's discuss how we should proceed.

Thank You

Anucha Browne Sanders

MSG 00251

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Senior Vice President  
Marketing and Business Operations  
New York Knicks  
212-465-6432

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**MSG 00252**  
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