

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ANUCHA BROWNE-SANDERS,

Plaintiff,

vs.

No. 06 Civ. 0589  
(GEL) (DF)

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

Defendants.

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February 26, 2007

10:11 a.m.

Videotaped deposition of BARRY  
WATKINS, held at the offices of Vladeck,  
Waldman, Elias & Engelhard, P.C., 1501  
Broadway, New York, New York, pursuant to  
notice, before Cary N. Bigelow, RPR, a  
Notary Public of the State of New York.

1. Watkins

2 she was looking for money?

3 MR. GREEN: The witness should be  
4 admonished that to the extent the  
5 conversations took place at the direction of  
6 counsel or with counsel present, he may not  
7 answer. Otherwise he can.

8 A. I just can't remember what was said in  
9 front of counsel in part of a group setting or  
10 where Mark was in or what Steve and I said just  
11 to each other.

12 I remember conversations we had before  
13 the lawsuit, but I can't remember -- I can't  
14 remember once the lawsuit hit other than Steve  
15 being hurt.

16 Q. Did you have any conversations with  
17 Mr. Mills about Miss Browne-Sanders before the  
18 lawsuit?

19 A. Sure we did, yeah, several.

20 Q. What did you discuss with Mr. Mills  
21 about Miss Browne-Sanders?

22 A. Well, generally we talked about the  
23 issues with Anucha that started after Isiah  
24 Thomas replaced Scott Layden as the president  
25 and general manager of the team.

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Watkins

Q. What were the issues that you discussed with Mr. Mills?

A. The issues were that Anucha wasn't changing the way she did her job to work better with Isiah and that things that should have been done weren't getting done and that many things that she should have been able to resolve with him ended up having to go to Steve instead of being cut off before it got to the presidential level.

We talked about that Anucha wouldn't bend, change at all. I reported in to him a lunch that I had with Anucha where I brought this up early on. I remember reporting to him a lunch that I had with Isiah where I asked Isiah to try to acknowledge her and work with her a little bit more closely so that he could resolve issues before they got to Steve. I can recall a conversation I had with Steve after I had lunch, a second lunch with Anucha where I said to him, you better start looking because there's no way it's going to work, she's never going to change, she's never going to adjust, she's as negative as could be and she clearly doesn't want to be

Watkins

1 here anymore.

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3 Q. In the beginning of your answer you  
4 started talking about comments about not getting  
5 the job done, right, and problems that shouldn't  
6 have had to go to Steve that went to Steve.

7 Who said that? Did you say that or  
8 was that something Mr. Mills said?

9 A. No. Again, to remember exact  
10 conversations are difficult, but once Isiah got  
11 the position, it became -- Steve said it became  
12 very difficult for him now because Isiah was  
13 much different in terms of running the  
14 organization than Scott Layden was and that  
15 Anucha was not working with Isiah in a way to  
16 resolve matters between them and she's not  
17 adjusting to fit the style of the new president  
18 of the team and he was, you know, in the  
19 beginning just mentioning that there were issues  
20 and then obviously towards the end they became  
21 more than issues, they became real problems.

22 Q. When did Mr. Mills first start talking  
23 to you about trouble between Mr. Thomas and Miss  
24 Browne-Sanders?

25 A. I can't remember exactly.

Watkins

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Q. Was it within a few months of Mr. Thomas joining the team?

A. I can't remember.

Q. Was it within a year of Mr. Thomas joining the team, do you think? Was it in 2004?

A. I am sure it was, but again, I am not great on those dates.

Q. Is it your recollection that Miss Browne-Sanders from the beginning of Mr. Thomas' tenure had difficulty adapting to his changes?

A. Generally. I don't know about the very beginning, you know, the first few weeks or first few months, but yeah.

Q. And that was something that Mr. Mills had told you?

A. Well, Mr. Mills had told me but I also was aware just in my dealings with Anucha of things that she would, you know, be trying to go to go to Isiah with and people -- I don't remember if I knew it directly from Anucha or not, but it was clear that Anucha's role in the organization was dramatically changing and she did not have the -- let's just, for the lack of a better term -- power she had had before Isiah

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Watkins

arrived and she wasn't accepting of that.

Q. Miss Browne-Sanders' job diminished after Mr. Thomas came on?

A. No. Her job responsibilities were always the same, as far as I understood them to be. Like I said before, she didn't report to me so I don't know exactly what they are, but I know that when Scott Layden was there Anucha had a -- because of her personal relationship with Scott Layden and with Don Chaney and with Jeff Nicks, she was involved much more on the basketball side than she would be shortly after Isiah assumed the position, so her nonbasketball responsibilities, as I understood them, stayed the same but her venturing out into the basketball operations side were changing, that was clear to anybody that was working within the Knicks or a position like mine at the time.

Q. Did Miss Browne-Sanders ever complain to you about Mr. Thomas?

A. Yes.

Q. And what did she say to you about Mr. Thomas?

A. I can't remember exactly, but the

Watkins

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2 general tone of it was in, one lunch we had --  
3 one lunch she had she was very understanding of  
4 her not having the same kind of role in the  
5 Knicks that she had under Scott, she criticized  
6 trades that he made, and I can't remember  
7 exactly -- the second lunch that I had with her  
8 she was even more critical of what he -- blaming  
9 him for the state of the franchise.

10 I don't remember exactly, but it was  
11 very critical stuff.

12 Q. You went to lunch with Miss  
13 Browne-Sanders twice?

14 A. Yes.

15 Q. And when were those lunches?

16 A. I don't remember exactly, but one  
17 was -- the second one was in late summer, maybe  
18 early September right before the year that she  
19 left, so maybe '05, and the first one would have  
20 been maybe a year before that, maybe the summer  
21 of '04.

22 Q. Focusing on the first lunch in the  
23 summer of '04, do you recall --

24 A. I think it was in the summer of '04.

25 Q. Approximately, then.

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Watkins

Do you recall anything that Miss Browne-Sanders said to you at that lunch other than what you have already said?

A. Yeah. She rolled her eyes about her role dramatically changing, she rolled her eyes that Isiah was making a deal with Frank Murphy, she clearly felt her place in the organization was different because of how the previous regime allowed her to venture outside into the basketball operation. She didn't seem -- not that she didn't seem, she clearly wasn't too pleased about how things had turned against her. That was the first lunch.

Q. You said she rolled her eyes about her role changing. What did she say about her role changing?

A. Oh, please, the way things are going around here with this guy, what he's done with our franchise, come on, give me a break, Barry, and I would say something good about Isiah, as one example.

Now, was that the exact words, no, but that clearly was the tone of her feelings that day.



Watkins

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Q. She didn't think he was doing a very good job?

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A. She did not think he was doing a very good job and she clearly did not like -- she had mentioned at the time that she wasn't -- I can't remember if she mentioned this or I did, but she wasn't really welcome at the training center when she didn't have a specific responsibility, she wasn't invited on the road with the team in any way, and those are things she had done, she had gone to training camp and those were things she wasn't now doing that she had done in the past.

Q. You are not sure if she said that or you said that?

A. I can't remember, but we talked about it.

Q. Anything else said at the first lunch other than what you have testified to?

A. That's the gist of it. I could be leaving something out that I could remember down the road, but that's what I remember right now.

Q. You have given us your best recollection at this moment?

A. At this moment, yes.