

00000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANUCHA BROWNE SANDERS,

Plaintiff,

v.

Index No.
06 CIV. 00589 (GEL)

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

Defendants.
-----X

December 18, 2006
10:06 a.m.

Deposition of VICTORIA BROWNE-MOORE,
taken by Defendants, pursuant to subpoena, at
the offices of Epstein Becker & Green, P.C.,
250 Park Avenue, New York, New York, before
ANITA T. SHEMIN, a Certified Shorthand
Reporter and Notary Public within and for
the State of New York.

Job No. 11225

1 VICTORIA BROWNE-MOORE

2 A Yes, she did.

3 MR. MINTZER: Is that --

4 MR. CESARATTO: T-O-N.

5 MR. MINTZER: D-E-N.

6 MR. CESARATTO: I am sorry.

7 BY MR. CESARATTO:

8 Q What do you recall Anucha telling you
9 about Scott Layden?

10 A I believe that he worked at the Knicks
11 at the time.

12 Q Did she say what position he was in?

13 A I don't remember specifically. General
14 manager or something like that.

15 Q To your knowledge, was your sister
16 friendly with Scott Layden?

17 A Yes, I believe so.

18 Q How do you know that your sister and
19 Scott Layden were friends?

20 A Well, they worked together, and he
21 also -- and he also served as a witness concerning
22 something that we needed to be done concerning my
23 mother.

24 Q What was that in conversation with?

25 A It may have been -- I think it was

1 VICTORIA BROWNE-MOORE

2 relating to a will, and he served as a witness
3 when she was in the hospital.

4 Q Were there any Madison Square Garden
5 employees other than Scott Layden who were the
6 witnesses to your mother's will?

7 A No.

8 Yes, there was someone, and I want to
9 say I believe it was a -- he served as a witness
10 to some type of document concerning my mother's
11 will. I want to be specific about that. Some
12 type of document concerning my mother's will. And
13 Faye was the other person you asked about.

14 Q Faye Brown?

15 A I believe that is her name.

16 Q Were you present at the time?

17 A I was not.

18 Q Do you know whether your sister asked
19 Scott Layden to be a witness?

20 A Yes.

21 Q Do you believe so because your sister
22 told you?

23 A Other than -- no, Ruthie actually
24 mentioned it to me, and Anucha may have.

25 Q Do you know whether Scott Layden has