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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 Civ. 0589 (GEL-XDR)

-----x
ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

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

Defendants.

-----x
October 30, 2006
10:00 a.m.

VIDEOTAPE DEPOSITION of DAN
GLADSTONE, 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 GLADSTONE

2 A. I think it had to do with -- in
3 November with Vernon Manuel. And -- yeah.
4 Yes.

5 Q. All right. So let's just step
6 back if we can.

7 You recall having -- where was
8 the conversation -- where did it take
9 place the conversation you had with
10 Ms. Browne-Sanders in which she was
11 crying?

12 A. In her office.

13 Q. In her office?

14 A. That's correct.

15 Q. And why were you in her office?

16 A. I think she called me in.

17 Q. What did she say to initiate the
18 conversation?

19 A. I believe this was before
20 Thanksgiving, and she wanted me to
21 document information regarding -- to
22 Vernon Manuel's performance and his poor
23 job performance. He was struggling at the
24 time.

25 Q. Did she say anything else?

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2 A. Not that I -- not that I can
3 recall specifically.

4 Q. Did you say anything in response
5 to that?

6 A. I -- I gave her what she wanted,
7 and I actually had a problem because it
8 was the Thanksgiving break, and I was
9 getting ready to go home for Thanksgiving,
10 and most people were just leaving the
11 office on the earlier side, and I recall
12 it was kind of later in the day, and she
13 wanted everything documented, and it
14 wasn't, hey, enjoy the -- Thanksgiving
15 with your family. It was, hey, you need
16 to get me everything about Vernon Manuel
17 over the weekend, and I need it buttoned
18 up and as factually together as possible
19 even if you must work on it this weekend.
20 I am need it, and I need it as soon as
21 possible.

22 Q. And this was right before
23 Thanksgiving? You think it was --

24 A. I believe so.

25 Q. Was it -- was it the Wednesday

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2 before Thanksgiving?

3 A. I believe so.

4 Q. Was that the first request she
5 had made to you of during -- of
6 documenting Mr. Manuel's performance
7 issues?

8 A. No, she had -- she had told me
9 to keep accounts of all his job
10 performance.

11 Q. When had she told you that?

12 A. I can't recall.

13 Q. Do you have any sense whether it
14 was 2004 or 2005?

15 A. Probably a couple of months into
16 his employment when he first showed some
17 signs of problems.

18 Q. And did you document his
19 performance problems?

20 A. I started taking notes I
21 believe, but it wasn't -- they
22 weren't -- I can't recall exactly what was
23 sent or the amount of documentation that
24 was put down. I felt uncomfortable
25 documenting and sending her this

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2 happened, and that -- and that Stephon was
3 not pleased with the salary. It seemed
4 really like he wasn't pleased with the
5 salary for Hassan, and he was not pleased
6 with -- with just how it was, kind of the
7 reality of the situation.

8 Q. Did you tell Ms. Browne-Sanders
9 the details of what Mr. Marbury had said
10 about her?

11 A. I expressed some of the things
12 that he said. That's -- yes.

13 Q. And this was back in -- back in
14 June?

15 A. I believe so. Yeah.

16 Q. When you say you expressed some
17 of the things that he said, what did you
18 tell Ms. Browne-Sanders?

19 A. I don't remember the specifics,
20 but I told her that some of the hostile
21 negative things he had said about her.

22 Q. Did you tell her that he had
23 referred to her as a bitch?

24 A. I did.

25 Q. You told her that he had

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2 referred to her as a black bitch?

3 A. I believe so. That was pretty
4 clear in my head.

5 Q. Did Ms. Browne-Sanders have any
6 reaction to that?

7 A. She was not pleased.

8 Q. Did she say anything or did she
9 just say I am not pleased?

10 A. I don't recall the conversation.
11 Just that it was not -- it was not a high
12 point career discussion talking about
13 this -- this kind of language.

14 Q. Did you have any further
15 conversation with her about Mr. Marbury's
16 call to you at that point in June?

17 A. No, not that I can recall.

18 Q. And how did it come to be that
19 in November you were writing an E mail
20 about the substance of the call?

21 A. That's actually a good question.
22 I -- I was pretty surprised that all this
23 information -- she needed this
24 information. It was -- seemed apparent to
25 me that she was getting as much

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2 information together as she could about an
3 uncomfortable situation. She was not
4 happy with the Vernon Manuel situation.
5 She wanted me to document everything about
6 that, and she wanted me to document pretty
7 much everything that I had experienced or
8 witnessed that seemed out of the ordinary.

9 Q. And as part of that, she had
10 asked you to document your -- your call
11 with Mr. -- Mr. Marbury in June?

12 A. I believe so.

13 Q. And as a result of that
14 direction, that's what you produced as the
15 top E mail in Gladstone 7?

16 A. That's correct.

17 Q. There are several items in
18 quotation marks in your E mail under the
19 heading "all referring to Anucha."

20 Do you have a recollection of
21 Mr. Marbury saying all those things that
22 are in quotations?

23 A. I do.

24 Q. The third bullet point refers to
25 a quote that Mr. Marbury said "We don't

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2 A. That's correct.

3 Q. Is that fair to say?

4 A. That's correct.

5 Q. You -- you wrote in the last
6 paragraph of that E mail "The conversation
7 was more detailed, but to the best of my
8 ability those are the only exact phrases
9 that I can recall." And then you went on
10 to say "I did call you that night to give
11 you a heads up that Stephon was angry with
12 the situation and that Stephon had some
13 hostile things to say about members of
14 Knicks management. "

15 Do you see that?

16 A. I do.

17 Q. You didn't refer to the
18 conversation that you had had with
19 Ms. Browne-Sanders a couple of days after
20 your call with Mr. Marbury?

21 A. I'm not sure what the question
22 is.

23 Q. In your E mail you didn't
24 refer -- you testified just a little while
25 ago that you had -- after that night you

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2 had had a couple of days later a
3 conversation with Ms. Browne-Sanders about
4 that subject?

5 A. That's correct.

6 Q. And that's not reflected in your
7 E mail, correct?

8 A. It doesn't -- no.

9 Q. Any particular reason why that's
10 not reflected in your E mail?

11 A. It didn't. I don't think it was
12 relevant. I think she asked me the
13 conversation that I had with Stephon.

14 Q. The phrases in quotations --

15 A. Yes.

16 Q. -- is it your testimony that you
17 had previously told Ms. Browne-Sanders the
18 substance of these quotations back in
19 June?

20 A. I don't remember the exact
21 words, but I remember we -- I told her
22 about the disparaging remarks.

23 Q. Well, did you just refer to them
24 generally as disparaging remarks or were
25 you more detailed about it?

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2 A. I don't recall exactly what was
3 said.

4 Q. So you might have just told her
5 that he had very negative things to say
6 about her without going to -- into the
7 details about what specifically he said?

8 A. I definitely told her that he
9 used the -- the F word and that he called
10 her a bitch.

11 Q. You definitely told her that in
12 June?

13 A. I -- to the best of my ability,
14 I can remember that because that's the
15 only reason I even had the conversation
16 with her is that, wow, I was surprised,
17 and, hey, you should know that that I got
18 a phone call that I find uncomfortable and
19 unprofessional to get called at 9:30 at
20 night by anyone on staff that's going to
21 say anything negative about anyone else on
22 staff using race -- race and gender, which
23 I just found to be very disturbing.

24 Q. Did you bring Mr. Marbury's
25 comments to anyone's attention other than

Unknown

From: Gladstone, Dan
Sent: Monday, November 28, 2005 6:27 PM
To: Browne Sanders, Anucha
Cc: Buchholz, Karin
Subject: Staffing issues - MARBURY

Importance: High

Attachments: Staffing memo(June 16).doc

**Anucha**

As per your request, I am submitting some comments made by Stephon Marbury from a phone conversation that happened this summer in June (perhaps June 16th at 9 PM in the evening) when he called me on my cell phone to comment on events that transpired as mentioned below in the attached email as pertaining to his cousin, Knicks staffer Hassan Gonsalves:

- Stephon was upset that he felt his family member, Hassan, was being treated unfairly by Knicks management
- Stephon was not happy with the salary range for his cousin Hassan.
- I explained the timesheets and payroll process, and that Hassan would not be assigned to work more than 35 hours per work nor would he be assigned to work overtime and Hassan's salary was determined by Knicks management.
- I explained that Hassan was not granted a parking spot at 31st street garage and I did not approve him using my access code nor was I aware he was forging my signature to park his vehicle.
- Stephon was upset at these circumstances and expressed extreme displeasure at the Knicks front office staff, particularly mentioning Anucha
- Though time has passed, several comments I can recall Stephon making include:

all referring to Anucha

- "No one likes that black bitch"
- "Fuck that black bitch, she thinks she runs the Knicks, she don't run shit. I sell the tickets around here, not her, I put people in seats, this is my team."
- "We don't like her, she thinks she tells us what to do, she don't tell us shit"
- "Fuck that black bitch, she ain't shit and we'll see what happens this year"

the conversation was more detailed but to the best of my ability those are the only exact phrases I can recall. I did call you that night to give you a head's up that Stephon was angry with the situation and that Stephon had some hostile things to say about members of Knicks management.

sincerely

Dan Gladstone

Original Message

From: Gladstone, Dan
Sent: Thursday, June 16, 2005 1:13 PM
To: Browne Sanders, Anucha
Cc: Buchholz, Karin
Subject: Staffing issues
Importance: High

Anucha

As per your request - here are 2 issues that occurred this week that need to be brought to your attention regarding Knicks Field Marketing staffer Hassan Gonsalves:

- Time Sheets - over the period of Hassan's employment (hired October 2004) he has had trouble completing his bi-weekly administrative time sheets properly (submitting to me for approval, for me to sign, and then submitting to payroll to process on time so that Hassan would receive a paycheck). I have had to return at least 6 timesheets for

Hassan to re-do and properly submit to me for approval/signature in order to reflect the proper time/hours worked on Knicks events, and as a result often Hassan has not had his timesheet submitted to payroll in order in time to get his check the following week. Recently Hassan again submitted a timesheet reflecting overtime he was not approved to work - I made a change in his hours to reflect what he WAS approved to work and submitted to payroll for him so that he would be paid on time to expedite the process. On this occasion, I submitted the timesheet and send it back to Hassan to correct, because I wanted to get it to payroll in a timely manner so he would be paid the following week.

- **Parking** - it has come to my attention through the managers at Central parking system that Hassan has been using my parking account (#3-6-9) for the 31st street lot to park his own personal vehicle on a frequent basis under my name. I did not approve nor give out my account to Hassan to park his car on my account nor use my code. In fact, I have been extremely clear to Hassan that he is NOT to drive nor EVER be behind the wheel of a MSG vehicle as the result of a background check on his driver's license which resulted in him not being permitted or legal to drive company vehicles, thus it is extremely important that he does not park on the company account as we could be liable for an accident that occurs in the lot or associated with him parking and driving under the Knicks.

Moving forward, I have attached a DRAFT of a memo I wanted to present to both Tasheem Ward & Hassan Gonsalves to meet with them and re-enforce the nature of their employment status with the Knicks...please review and let me know how to proceed. I can also forward a copy of this memo to HR to approve or comment on...please advise....



Staffing memo(June 16).doc

Thank you.

Dan Gladstone
New York Knicks
Director, Community Relations & Field Marketing
2 Penn Plaza - 14th Floor - New York, NY 10121

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f# (212) 465-6047

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MEMO

TO: Tasheem Ward
Hassan Gonsalves

FR: Dan Gladstone

CC: Anucha Browne Sanders
Karin Buchholz

RE: Employment Guidelines

DT: 6/16/05

The following is a memo to outline and summarize the basic parameters of your employment:

You are employed in the New York Knicks Community Relations Department / Field Marketing with an annual salary of \$30,300.

Time Sheets: In order to receive paychecks, you must complete and submit a bi-weekly administrative time sheet to Dan Gladstone to review and approve with signature, this timesheet should then be copied (with a copy going to Dan Gladstone) and submitted to the payroll department to be processed.

You will be responsible to work thirty five (35) hours per week, seven (7) hours per day (Monday – Friday) or any combination of hours that equal but does not go above thirty five (35) hours per week. If you are scheduled to work weekend events or 7 days per week, the total scheduling of your hours will never exceed thirty five (35) hours per week.

Scheduling: You will receive your work schedule – assignment of events that total thirty five (35) hours per week – in a weekly meeting with Dan Gladstone that will be scheduled based on the event calendar.