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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 8, 2006  
12:24 p.m.

VIDEOTAPE DEPOSITION of ISIAH  
LORD THOMAS, III, 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.

THOMAS

A. Well, for today they are.

Q. I don't --

A. Okay.

Q. Okay.

A. And if I left that out,  
that -- that was not my intention.

Q. Okay. Is there anything else  
that is inaccurate about this statement?

A. "When asked if charging party  
reported to him, he stated that she  
reported to Mills." That -- that would be  
accurate.

Q. Okay.

A. "According to Thomas, when he  
started working he started immediately to  
implement new changes."

Q. Is that accurate?

A. Assess and implement changes.  
And -- and I think in -- in the phone  
interview what I tried to explain in the  
phone interview was that when I was hired  
in December I believe of '03 the first  
thing that I needed to kind of clean up  
was the on court product in terms of the,

1 THOMAS

2 you know, the players and the people, who  
3 were -- they were coming to see play.  
4 The -- and my job was to quickly try to  
5 evaluate and assess the talent base that  
6 we had, and I spent a lot of time trying  
7 to assess and maneuver that talent base,  
8 and so -- so that was -- that was the  
9 implementing of changes on the on court  
10 product and also, you know, tried to clean  
11 up the space and implement policy around  
12 the players and procedures in terms of the  
13 way we -- we would operate and carry  
14 ourselves and conduct ourselves.

15 Q. Okay.

16 MS. EISENBERG: Is there a  
17 question?

18 MR. SMITH: Patience is a  
19 virtue.

20 MS. EISENBERG: I know.

21 Q. Okay. Is there anything else  
22 that is inaccurate in this document?

23 A. Well, we are going to go through  
24 this line by line.

25 Q. We can go through this line by

1 THOMAS

2 line.

3 A. Okay. So the first thing I did  
4 was to close access to practices only to  
5 coaches and players. Locker rooms were  
6 also restricted only to players and  
7 coaches and medical team. Well, the first  
8 thing I did was implemented a dress code  
9 at the practice facility and also, you  
10 know, for our players, and -- and I did  
11 implement, you know, access -- I closed  
12 down access to practices, coaches and  
13 players, locker rooms, so forth. So that  
14 is -- that's accurate.

15 Q. Okay. And just to -- I want to  
16 go back for a second. The line before, it  
17 says, "According to Thomas when he started  
18 working he started to immediately  
19 implement new changes."

20 Are you saying that you didn't  
21 tell the EEOC person that or are you --

22 MR. SMITH: Withdrawn.

23 Q. Are you saying is what she said  
24 that you -- the first thing you did is you  
25 started to implement new changes? Did you

1 THOMAS

2 tell the EEOC investigator that you were  
3 implementing new changes?

4 A. Yes.

5 Q. Okay. And did you tell the EOC  
6 investigator that you did close practices  
7 to coaches and players and locker rooms  
8 were restricted only to medical staff?

9 MS. EISENBERG: Objection as to  
10 form.

11 A. No, I didn't tell her that I  
12 closed practice to the coaches.

13 Q. I am sorry. You are right. Let  
14 me -- let me -- excuse me.

15 You said the first thing you did  
16 was to close access to practices to only  
17 coaches and players, and locker rooms were  
18 also restricted only to players, coaches  
19 and medical staff.

20 Did you tell the EEOC  
21 investigator that?

22 MS. EISENBERG: I am going to  
23 object as to form.

24 A. Now, does that mean I can answer  
25 that or not?

1 THOMAS

2 MS. EISENBERG: Yes.

3 Q. Yes, you can answer.

4 MS. EISENBERG: If you are able  
5 to answer it, go ahead.

6 Q. She will instruct you when she  
7 doesn't want you to answer.

8 A. Okay.

9 Q. I'm sure.

10 A. Yeah, I -- I did that.

11 Q. Okay. And did you tell the  
12 investigator -- I am going to the next  
13 line -- that was in his opinion needed so  
14 to restrict -- I am sorry. That was in  
15 his opinion needed, so the players can  
16 concentrate and play?

17 A. Well, that too, but that -- that  
18 environment that the -- that the players  
19 have on -- and I said to her that the bus,  
20 the plane, the training room, the locker  
21 room, those are -- are player -- player  
22 environments, and those environments, you  
23 know, are -- are closed, and they -- they  
24 needed to be protected.

25 Q. All right. But did you tell the

1 THOMAS

2 EEOC investigator that the players needed  
3 to concentrate -- that the they needed to  
4 do so for -- so the players can  
5 concentrate and play?

6 A. That would help them concentrate  
7 and play.

8 Q. Okay.

9 A. If you would cleanse that area.

10 Q. I am going to go to the next  
11 line. "The charging party was to deal  
12 only with the marketing and community  
13 relations."

14 Did you tell the EEOC  
15 investigator that?

16 MS. EISENBERG: Objection as to  
17 form.

18 A. No. I --

19 Q. Okay.

20 A. I believe I -- I think I -- it  
21 is written here, but I think we were  
22 talking about what I understood her  
23 responsibilities to be, and those were in  
24 the marketing areas and also in the  
25 community relations area, and --

1 THOMAS

2 -- multiple statements contained in that  
3 one sentence.

4 MR. SMITH: Sure.

5 MS. EISENBERG: If you can  
6 answer it.

7 A. I'll do my best to go line by  
8 line and kind of --

9 Q. Okay.

10 A. -- tell you what I was speaking  
11 to her about. When -- when we did make  
12 these changes -- "According to Thomas  
13 charging party did not like the change  
14 because now she was not able to schedule  
15 players as freely as she did before," I  
16 don't -- I don't recall if I said that.

17 Q. Okay.

18 A. And I definitely can't say to  
19 you that Anucha felt that way because I  
20 don't know, but in -- in terms of her  
21 being restricted from the plane and buses  
22 or anything else, I -- I am quite sure I  
23 said to -- to her that Anucha had access  
24 and could go on the plane and bring  
25 marketing people or whoever she wanted to



1 THOMAS

2 bring on the plane. The only thing we was  
3 asking for is notice, who she wanted to  
4 bring and the reasons why they were  
5 coming. And I -- I do believe, you know,  
6 we -- we had a trip where I -- I don't  
7 know if she was on the plane because  
8 I -- I wasn't on there either, but I do  
9 believe that there was one marketing trip  
10 that a marketing group, and I don't know  
11 if -- again, I don't know if she was on  
12 the plane or not. I don't know. Again, I  
13 was saying to -- is it Patricia?

14 Q. Yes.

15 A. I was saying to Patricia, you  
16 know, the changes implemented again just  
17 required notice and if -- if Anucha gave  
18 us notice, then we would give her access.

19 Q. I want to go to the next  
20 sentence. "According to Thomas, he, the  
21 charging party, and Frank Murphy would  
22 meet on a weekly basis and when needed to  
23 go over schedules."

24 Did you have a discussion with  
25 the EEOC investigator regarding that

1 THOMAS

2 A. No, that was before.

3 Q. Okay. And what did Mr. Moran  
4 tell you in your discussions regarding the  
5 charging party's complaints regarding  
6 sexual harassment?

7 A. He -- he asked if -- he asked if  
8 I -- I believe they asked me if I swore,  
9 did I use profanity, and they asked me a  
10 couple of questions about if I ever  
11 believe I asked Anucha or asked Anucha I  
12 want to go offsite with her or if I was in  
13 love with her, and I don't recall my  
14 answers to those questions verbatim, but I  
15 believe I told them I swore, and I -- I  
16 had no -- wasn't in love with Anucha.

17 Q. Okay. I'm going to stay on the  
18 document. I am going to go down to a few  
19 lines where the sentence starts "Thomas  
20 stated that the next thing..."

21 Do you see that sentence?

22 A. Yes.

23 Q. Okay. It says "Thomas stated  
24 that the next thing he was told that there  
25 had been" -- "that he has been sued by

1 THOMAS

2 men said to women, and it is not -- it is  
3 not given, taken, or received as a come on  
4 so to speak.

5 Q. Okay. And did you give her any  
6 examples of how you used the word love as  
7 a greeting to men and women or more?

8 A. I could have. I don't recall.

9 Q. Okay.

10 A. I mean that -- in trying to  
11 explain it, I could have said it, but  
12 I -- I don't know word for word, verbatim  
13 how I said it.

14 Q. Off the document for a second.  
15 Have you ever used the greeting love with  
16 Anucha?

17 MR. GREEN: Objection to form.

18 MR. PARCHER: Could you read  
19 that question back, please.

20 (Record read.)

21 MS. EISENBERG: Objection as to  
22 form.

23 A. Maybe in a greeting of hello or  
24 goodbye but never to be in love.

25 Q. Okay. Could you describe how

1 THOMAS

2 (Record read.)

3 MR. SMITH: And what was his  
4 answer.

5 (Record read.)

6 Q. Have you ever used -- used the  
7 term bitch at -- when you -- as --

8 MR. SMITH: Withdrawn.

9 Q. As president of basketball  
10 operations for the New York Knicks, have  
11 you ever used the term bitch in describing  
12 any employee?

13 A. No.

14 Q. Have you ever used the term ho  
15 in describing any employee?

16 A. No.

17 Q. As president of basketball  
18 operations for the New York Knicks, have  
19 you ever used the word bitch?

20 A. At work?

21 Q. Yes, at work.

22 A. No.

23 Q. Have you ever used the word ho  
24 at work?

25 A. No.

1 THOMAS

2 Murphy. At any time during that  
3 conversation did you ever curse at  
4 Ms. Saunders?

5 A. I -- I have never cursed at  
6 Ms. Sanders, no.

7 Q. Okay. You're saying you've  
8 never cursed at her?

9 A. I have never cursed at  
10 Ms. Sanders.

11 Q. Okay.

12 A. Now, have I ever swore or  
13 swore or used curse words around her, I  
14 probably have. But have I cursed at her,  
15 no, I have not.

16 Q. Okay. All right. During this  
17 conversation on the phone with  
18 Ms. Saunders, did you at any time use the  
19 word bitch?

20 A. No.

21 Q. Did you at any time use the word  
22 fuck?

23 A. That -- that -- that could have  
24 come out but not necessarily at her.  
25 I -- you know, I -- I could have said I'll

1 THOMAS

2 F'ing handle it or I'll -- I could -- I  
3 could have sworn but never at her, and by  
4 the way I -- when she -- when that phone  
5 call was made, I wasn't upset with her for  
6 calling me and informing me. I -- my job  
7 was to handle it, and I -- I wasn't -- I  
8 wasn't mad or anything that she phoned and  
9 told me this.

10 Q. Okay. And during that  
11 conversation over the phone, did you ever  
12 refer to be Ms. Sanders as a ho?

13 A. Please. No. Come on.

14 Q. Okay. Now, when you first  
15 started at -- as president of basketball  
16 operations for the New York Knicks, did  
17 you ever inform anyone that you wanted the  
18 players not to do any community  
19 activities?

20 A. No, just the opposite.

21 Q. Did you ever tell anyone that  
22 you wanted the players to limit the  
23 community activities?

24 A. No, I wanted -- I wanted  
25 structure to the activities, and I

1 THOMAS

2 Anucha Browne-Sanders to be attractive?

3 MR. GREEN: Objection to form.

4 A. To me?

5 Q. Yes, to you. Do you find her to  
6 be an attractive woman?

7 A. I'm not attracted to her, no.

8 Q. Have you ever told anyone that  
9 you found Anucha Browne-Sanders to be an  
10 attractive woman?

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

12 Q. Okay. As -- has the Knicks  
13 during your time as president of  
14 basketball operations ever had an open  
15 practice?

16 A. Yes.

17 Q. Okay. And do you recall ever  
18 having an open practice around October of  
19 2005?

20 A. Yeah, we -- we have one every  
21 year or so.

22 Q. Did you have one in October  
23 2005?

24 A. Yes.

25 Q. Okay. And did you at any time

1 THOMAS

2 during that open practice ever tell anyone  
3 that you believed that Anucha  
4 Browne-Sanders was attractive?

5

6 MR. SCHOENFELD: Could you  
7 repeat that question. I am sorry.

8 (Record read.)

9 A. No, I -- no, I didn't.

10 Q. Okay. Did you ever tell anyone  
11 during that open practice that you  
12 believed that it was hard to work with  
13 Anucha Browne-Sanders because she was easy  
14 on the eyes?

15 A. No.

16 Q. Did you ever tell anyone during  
17 that open practice that you believed it  
18 was hard to concentrate because Ms. Anucha  
19 Browne-Sanders was attractive?

20 A. No, I've never said that.

21 Q. Okay. As president of basketball  
22 operations for the New York Knicks, do you  
23 have supervisory responsibility over the  
24 players?

25 A. What do you mean by



1 THOMAS

2 Q. And did you have a meeting with  
3 Steve Mills and Mrs. Anucha  
4 Browne-Sanders regarding her job  
5 responsibilities or your job  
6 responsibilities?

7 A. Yes, we did.

8 Q. Okay. Could  
9 you -- where -- where did that meeting  
10 take place?

11 A. In Steve's office.

12 Q. Do you -- do you recall  
13 approximately when that occurred?

14 A. I -- I can't recall like the date  
15 and --

16 Q. Was it in 2004?

17 A. Yeah, because I got here in  
18 December, so it was definitely, yeah,  
19 2004.

20 Q. And was it very -- was the  
21 meeting very shortly after you had your  
22 conversation with -- with Anucha  
23 Browne-Sanders when you were -- when you  
24 asked what I am -- what -- then why am  
25 I -- then why I am fucking here?

1 THOMAS

2 A. No, that ain't what I said. Why  
3 the fuck am I here.

4 Q. Yes. Did that meeting occur  
5 shortly after that?

6 A. Yes, it did.

7 Q. Within a few days, a week, a  
8 month?

9 A. I would say roughly a few days.

10 Q. A few days. And what was  
11 discussed at that meeting?

12 A. Roles and responsibilities, and,  
13 you know, Steve outlined the things that  
14 he wanted from me, and he outlined the  
15 things that he wanted from Anucha, and I  
16 assured him and Anucha in a meeting that  
17 that I would make sure that I put someone  
18 in place so if there was ever a time that  
19 I wasn't available because a lot of my  
20 time was spent out at the practice  
21 facility and traveling and scouting and  
22 getting players and trying to make trades,  
23 and in a weekly management meeting I  
24 assigned Frank to that meeting, and I  
25 assigned -- and I told Frank whatever

1 THOMAS  
2 obligations or responsibilities that we  
3 have that need to be fulfilled from  
4 basketball operations, player requests,  
5 everything else, let's make sure that we  
6 get them done. And by the way, when a  
7 player shows up, let's make sure that he  
8 shows up with, you know, the right  
9 attitude and -- and do what he needs to  
10 do.

11 Q. Okay. During that meeting with  
12 you, Steve Mills and Anucha  
13 Browne-Sanders, did -- did Steve -- did  
14 Mr. Mills confirm to you the roles of  
15 Ms. Browne-Sanders that she was in charge  
16 of all profit and loss, marketing and  
17 players transactions?

18 A. Steve said that she was -- she  
19 was in charge of marketing, and then he  
20 went on to -- I think he kind of talked  
21 about the inherent conflict between  
22 basketball and marketing, and that it  
23 always kind of exists, and, you know, and  
24 he had said, you know -- you know,  
25 if -- and he said to me if -- if Anucha

1. THOMAS

2 needs players to show up to -- to execute  
3 and be at community relations or whatever  
4 it is that they need to be at, you know,  
5 your job is to make sure that the players  
6 are there, and if there is an event that  
7 is scheduled, the players are going to be  
8 there, and I said I didn't have a problem  
9 with that.

10 Q. Okay. During that meeting, did  
11 Steve Mills ever step -- step out the  
12 room?

13 A. I don't -- I don't remember if  
14 Steve step out or not. I don't -- I  
15 remember the meeting. I don't remember if  
16 he stepped out or not.

17 Q. During that meeting did you ever  
18 curse at Anucha Browne-Sanders?

19 A. I never cursed at Anucha. Now,  
20 do I swear? Have I cursed? Yeah, but  
21 have I ever cursed at Anucha? No, I -- I  
22 don't curse at anyone.

23 MS. EISENBERG: Mr. Thomas, it  
24 is getting a little bit late. I want to  
25 make sure you are just responding to the

1 THOMAS

2 A. It could be.

3 Q. Could it have been more than 20  
4 times?

5 A. Yeah, it -- it do because the  
6 amount of time -- the games that you play  
7 and when you meet. I mean yeah, it could  
8 have been. I don't know. I don't know  
9 the exact number to that.

10 Q. Did you hug Anucha  
11 Browne-Sanders often?

12 MR. GREEN: Objection to form.

13 A. Her and Karen when -- when we  
14 would meet, when we would see each other  
15 you -- at the game, you -- you give a hug,  
16 kiss hello. Yeah.

17 Q. Okay. Did there ever come a  
18 time where you became aware that Mrs.  
19 -- Ms. Sanders -- Anucha Browne-Sanders  
20 didn't want you to hug her?

21 A. One time the -- actually it was  
22 a -- the last time before you guys were in  
23 the news paper telling me what this was  
24 all about. I think it was -- yeah, I -- I  
25 went to hug her and, you know, and say

1 THOMAS

2 hello, and she kind of pushed back  
3 and -- and I remember I -- I said no love  
4 today, and she was very kind of cold, and,  
5 you know, there were ushers and other  
6 people around at gate one, and it was kind  
7 a little awkward moment, and I -- I  
8 thought to myself, well, that's -- that  
9 was strange. That was kind of weird. I  
10 left it at that.

11 Q. When you -- the time that you  
12 came to hug her, when she pushed away -- I  
13 am sorry.

14 MR. SMITH: Withdrawn.

15 Q. The times that you would hug  
16 Ms. Anucha Browne-Sanders, did you hug her  
17 in -- in front -- in front of her, in  
18 front, back, side?

19 A. No, we would always see each  
20 other coming towards each other, and you  
21 shake, hug, how are you doing.

22 Q. Okay.

23 A. Is that --

24 Q. On the day that she backed away,  
25 was it -- did you come in front of her or

1 THOMAS

2 from behind her?

3 A. I believe I actually -- I  
4 believe it was on the side. I  
5 believe -- I think I walked up, and I put  
6 my -- this is her here. I think I put my  
7 left hand on her. I guess it would be her  
8 right shoulder, and I leaned in and I  
9 said, hey -- hey, Nuch, how you doing, and  
10 I went to give her a kiss on the cheek,  
11 and, you know, that is when I got that  
12 reaction.

13 Q. Did at any time you ever tell  
14 Mrs. Anucha Saunders that I know why we  
15 have -- why there is friction between us?

16 MR. GREEN: Objection to form.

17 A. No.

18 Q. Did you ever say to Mrs. Anucha  
19 Sanders that you believed that you and her  
20 were similar or alike?

21 A. I don't believe so. No.

22 Q. Okay. Did you ever say our  
23 relationship is like Love And Basketball?

24 A. No.

25 Q. Have you ever seen the movie of

1 THOMAS

2 Love And Basketball?

3 A. No, I have not seen the movie.

4 Q. Did you ever in your  
5 meetings --

6 MR. SMITH: Withdrawn.

7 Q. In your -- have you ever -- did  
8 you ever in your encounters with Anucha  
9 Browne-Sanders ever ask her to go off  
10 site?

11 A. No.

12 Q. Did you ever have a hotel suite  
13 at the Mandarin Hotel?

14 A. Have I ever had one?

15 Q. Yes.

16 A. Yes, I have.

17 Q. Was there ever a period of time  
18 when you were president of basketball  
19 operations for the New York Knicks that  
20 you held a suite at the Mandarin Hotel for  
21 more than a week?

22 A. That I held the suite for  
23 more --

24 Q. That you had a suite at the  
25 Mandarin Hotel for more than a week.



1 THOMAS

2 for the New York Knicks?

3 A. Yes, she did. She was a -- I  
4 think she was the head of the dance team  
5 and probably had some other  
6 responsibilities that I didn't -- that I  
7 don't know about.

8 Q. Did you ever request Petra Pope  
9 to go visit or check on the refs, NBA  
10 refs, referees?

11 A. Yes, I did.

12 Q. And why did you ask Petra Pope  
13 to go check on the referees?

14 A. Because when I first got here,  
15 the -- again, one of the things that we  
16 wanted to clean up was front of the house,  
17 and the officiating, you know, I -- I  
18 thought the way we were treating the  
19 officials, you know, was poor. They -- we  
20 didn't give them food. We didn't give  
21 them a proper changing room, and I didn't  
22 think that we treated them well, and I  
23 wanted to treat the officials a little  
24 better, and their -- their changing room  
25 also didn't have the amenities for a

THOMAS

female when she came because there are female officials. So I wanted to make sure that our female -- when a female official came to The Garden that she had a proper changing place, and that Dan's team changed the way they -- their locker room was right next to the officials locker room, and I wanted -- we start catering food and putting food in the officials locker room. So I asked Petra since her -- her locker room is right next door to the officials locker room, could she check and make sure that if the officials needed anything while there because it would -- because our locker room is at the end. Sometimes they need to be taped. Sometimes they have hamstring problems. So if there was any miscommunication, since she was right there, if she could check and see that they were properly taken care of and felt that we as host we were doing whatever we could possibly do for them.

Q. Did Mr. Steve Mills ever speak

1 THOMAS

2 A. No, I never heard that.

3 Q. Did Ms. Pope ever tell you that  
4 she didn't want to check in on the  
5 referees?

6 A. No.

7 Q. Do you know who -- do you know  
8 who complained to Steve about Petra Pope  
9 checking in on the referees?

10 A. I don't know who complained.

11 Q. How long have you known Petra  
12 Pope?

13 A. I have known Petra over fifteen,  
14 twenty years.

15 Q. So you knew her prior to being  
16 president much of basketball operations  
17 for the New York Knicks. Am I correct?

18 A. Yes.

19 Q. Were you and Petra Pope good  
20 friends?

21 A. I would say we were good  
22 friends.

23 Q. Has Petra Pope ever been to your  
24 house?

25 A. Not -- not here in New York, no.

1 THOMAS

2 being part of a previous regime.

3 Q. Did you tell anybody at MSG that  
4 you -- that Ms. Browne-Sanders was upset  
5 that you did not give Mr. Nix the  
6 assistant general manager position?

7 A. No. Actually he was the  
8 assistant GM with me I think through the  
9 first draft, and I think I made a change  
10 in August after evaluating and assessing  
11 his talent, and the Knicks -- at that time  
12 I thought we were talent depleted in terms  
13 of what was out on the floor. I thought  
14 he would be best served in another role,  
15 so I assigned him to another role.

16 Q. And what role did you assign him  
17 to?

18 A. I made him director of scouting,  
19 and I gave Frank more responsibility and  
20 made him more or less, you know, the  
21 senior vice president of basketball  
22 operations, and the skill sets that he  
23 had, I needed more because he was more  
24 skilled in contract negotiation and the  
25 collective bargaining area, and Jeff was