

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 12, 2006
10:08 a.m.

VIDEOTAPE DEPOSITION of STEPHEN
C. MILLS, 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.

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2 had spoken to a lot of candidates, and I
3 met Anucha I believe in '96. I believe it
4 was at the -- at the Olympics in -- in
5 Atlanta and had -- you know, was impressed
6 with her at that point. She had come in
7 and met with us with -- doing some work
8 with IBM while I was -- while -- IBM was a
9 sponsor of the Garden, and she had -- had
10 come and worked on some projects, and then
11 I looked at all the candidates to
12 fill -- fill the position as vice
13 president of marketing. She was someone
14 that ultimately I decided -- I thought was
15 the right person for the job.

16 Q. Did you interview her?

17 A. Yes.

18 Q. And what did the two of you
19 discuss in the interview, if you recall?

20 A. Discussed my -- my goals with
21 the Knicks, discussed her experiences at
22 IBM and Kodak, what she was looking for in
23 her next career, what we were looking for
24 or what I particularly was looking for in
25 terms of the role that -- that was open in

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2 the Knicks.

3 Q. And particularly with respect to
4 Ms. Browne-Sanders' experience at IBM and
5 Kodak, what was said on that? What did you
6 say and what did she say?

7 A. It -- I don't remember the
8 specifics of what she said. I -- you
9 know, I looked at the marketing background
10 as -- at IBM and the structure of IBM as
11 something that I thought was -- would be
12 good for what I was looking for in the
13 Knicks, at some point better sales
14 experience, and Kodak I thought would be
15 good as we were moving into a sales mode
16 within -- within the Knicks.

17 Q. What were the duties of the
18 position of vice president of marketing
19 that you were considering
20 Ms. Browne-Sanders for?

21 A. Really to oversee the day-to-day
22 operations of the marketing staff, oversee
23 the community relations, oversee the
24 interaction between the Knicks staff and
25 the other departments within The Garden.

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2 Those are generally the responsibilities.

3 Q. Okay. I think your previous
4 answer may have touched on this, but why
5 is it that you hired Ms. Browne-Sanders?

6 A. I thought she was -- I thought
7 she -- she had a skill set and
8 that -- that would -- that was a good fit
9 for what I was looking for within the
10 Knicks organization.

11 Q. And what were you looking for
12 within the Knicks organization at that
13 point?

14 A. I think -- did I answer that?

15 Q. Well, I think your answer might
16 have alluded to it. If there is anything
17 else you want to add to it, that is fine.

18 A. I think I -- I think I -- I
19 answered that.

20 Q. Okay. Were you looking to hire
21 someone to reorganize the Knicks
22 operations at that point?

23 A. I -- I wanted someone to -- to
24 add some more structure to the marketing
25 department and the activities that took

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been to -- would have been sort of -- this would have been during my early tenure with the Knicks though.

Q. Was Mr. Browne-Sanders receptive to your feedback about her management style?

A. Initially she was. At the -- at the end -- at the end of her tenure during -- during '05 actually she was actually, you know -- she would sometimes be receptive, but she was very combative in other occasions, in many occasions about giving her feedback that I thought was appropriate in terms of her ability to function at The Garden and function within her job.

Q. My question at this time point was just focused on your feedback about her management style. Was she receptive to that feedback?

A. Sometimes she was receptive to the feedback, but there were many times when she wasn't receptive to the feedback and in fact combative about the feedback.

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2 Q. Okay. Was that in 2005 that she
3 was combative about the feedback?

4 A. Yes.

5 Q. And did -- you gave her feedback
6 about her management style in 2005?

7 A. Yes.

8 Q. And what was the feedback that
9 you gave her about her management style in
10 2005?

11 A. It was consistent with
12 the -- with the feedback that I've given
13 her, you know, throughout her time at The
14 Garden that she needs -- needs to find a
15 way to get the most out of her -- out of
16 her people and as we moved into -- into
17 2005 became broader than just management
18 style but management structure.

19 Q. And what -- what do you mean by
20 "management structure"?

21 A. You know, how she
22 organized -- how she organized her -- her
23 employees, how she organized her employees
24 around strategies and strategically where
25 she wanted to take the organization and

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have a management focus and a management plan that -- that as opposed to -- to solve issues with one off replacements to step back and have some -- some structure and some strategic process as to how -- how things should get accomplished.

Q. In 2005, did you ever tell Mrs. Browne-Sanders that you thought that she really puts together a first class organization?

A. I may have said that to her.

Q. Yes. And how is that consistent with your testimony now that you think that her -- the structure of the organization that she was putting together had -- had deficiencies?

MR. GREEN: Objection to form. You may answer.

A. There were many times in 2005 where -- where as -- as employees departed I was very clear with Anucha and disappointed in -- in some of the things that Anucha was doing in terms of her structure, and I made it very clear to her

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2 that I felt that in response to people
3 leaving the organization there were many
4 times that rather than take a step back
5 and strategically looking at what she was
6 trying to get accomplished in leading the
7 group and what she -- the goals that she
8 had for the group and say let me look back
9 and decide how I think this organization
10 should be structured, that she responded
11 in a very sort of one off approach to
12 structuring people and putting people in
13 positions to get through today's issue as
14 opposed to a longer term strategic view.

15 Q. But you do have some
16 recollection of telling her during that
17 same time period in 2005 that she had put
18 together a first class organization. Is
19 that -- is that fair to say?

20 MR. GREEN: Objection. Asked
21 and answered, but the witness may answer
22 again.

23 A. I felt there were many aspects
24 of the Knick organization that were very
25 good and that -- and that were -- that

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were good, but I did have a problem with Anucha in terms of the strategic development of her organization. I was clear with Anucha about that.

MR. MINTZER: Could you read back my question, please.

(Record read.)

Q. Could you answer that question?

MR. GREEN: My objection as being asked and answered remains. You may answer fully, if you can, Mr. Mills.

A. I think I answered.

Q. Was it a yes or no?

MR. GREEN: Objection to form. You may answer more fully, if you can, Mr. Mills.

A. I think there may have been times when I told her I was happy with -- with parts of the organization and some things that were going on with the organization but that I always had an issue about strategically where the organization was going and how she was responding to issues that were happening

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2 within the team.

3 Q. So your testimony -- your
4 recollection is that you told her that you
5 were happy with certain parts of her
6 organization. Is that -- is that
7 accurate?

8 A. I --

9 MR. GREEN: Objection to form.
10 You may answer, Mr. Mills.

11 A. I can't remember whether
12 I -- whether I focused on a particular
13 part. I'm telling you what I -- my views
14 were in 2005 about the Knicks as an
15 organization.

16 Q. Well, I'm not asking for your
17 views. I'm asking what you communicated
18 to Mr. Browne-Sanders, Mr. Mills, and I am
19 trying -- you testified to certain
20 conversations you had with
21 Ms. Browne-Sanders, and I am trying get
22 your best recollection.

23 Is it the case that you told her
24 in 2005 that she had put together a first
25 class organization?

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whether he had ever been the subject of a complaint of harassment or a complaint of discrimination, so he may now answer that question fully.

A. No, I haven't been.

Q. Okay. And that's -- just to be clear, my question had been I believe whether or not you had ever been alleged to have engaged in any kind of discriminatory or harassing conduct by anyone who worked for you. The answer is no?

A. Yes.

Q. The -- Ms. Browne-Sanders' position as SVP of business operations, did the job have any budgetary responsibilities?

A. Yes.

Q. And what were they?

A. They are responsibilities of managing budgets in the departments that -- that the job was -- was responsible for, managing the expense side and -- and, you know, in limited places

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revenue but mostly
management -- management on the expense
side.

Q. Between 2004 and -- 2002 and
2004, did Ms. Browne-Sanders have any
responsibility for creating a budget for
the Knicks organization?

A. She was -- she was involved in
the budgeting process. I was more -- more
active in my position at that time and
very active in -- in that -- in that
process of the budget -- of overall
budget -- budget preparation for both the
Knicks and Rangers, but she was
clear -- was clearly involved in the
budget process.

Q. Was there a difference between
your activeness in the budget process
between 2004 and 2005?

A. Yes.

Q. And could you describe that?

A. In -- in 2005 the -- both the
job in -- of the senior vice president of
business ops for the Knicks had to take on

1 MILLS

2 a much more strategic and -- and revenue
3 generation responsibility within -- within
4 the budget. In '05 we were going into a
5 situation with -- where the Rangers were
6 coming out of a lockout, so they were back
7 in business whereas in the prior season
8 there was no ranger activity. So I was
9 actually more involved on the Knicks side
10 at that point, but moving into '05 both
11 the Knicks -- the senior vice president of
12 business operations for the Knicks and the
13 senior vice president of business ops for
14 the Rangers had to really take charge of
15 the entire strategic process, the entire
16 budget process from start to finish, and I
17 was less directly involved in the -- in
18 the creation process leading up to the
19 final product.

20 Q. Was there -- are you familiar
21 with the phrase P and L manager?

22 A. Yes.

23 Q. And at some point did the SVP of
24 business operations position for the
25 Knicks become a P and L manager?

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A. Yes.

Q. When was that?

A. Sometime in -- at some point
in -- in '04.

Q. Did the job of becoming a P and
L manager coincide with the greater
responsibilities in terms of the budgetary
process that you -- you just were
mentioning?

A. Yes.

Q. Did the increased
responsibilities of the senior vice
president of business operations position
that you described, were those ever
reflected in a document that you've seen,
anything in writing?

A. They -- they were reflected
in -- in -- in conversations that we
had. They were reflected in a -- a salary
adjustment as the grade changed -- change
in the position took place.

Q. My question was: Did the
description of the increased
responsibilities, did that appear in a

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document that you were familiar with?

A. I -- I don't believe there was ever a new operational position described.

Q. Okay. So to your knowledge, you are not aware of Ms. Browne-Sanders being given a new job description and saying these are now your new responsibilities or anything like that?

MR. GREEN: Objection to form. You may answer.

A. Ms. Browne-Sanders was -- it was very clear to Ms. Browne-Sanders what her new responsibilities were. It was very clear to her the process and the responsibilities she had as the -- as the P and L manager and -- and the responsibilities she had as -- as part of this -- this position as the P and L manager.

Q. So my question was just whether or not she had ever been given a document that had described her new responsibilities?

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2 A. Well, she was given documents
3 that -- there were -- as we planned for
4 the budget process and as we planned for
5 how we were going to strategically design
6 where the team was going, she was given
7 timelines, she was given outlines. She
8 was given information as to what the
9 expectations of -- of her and -- around
10 the expectations of the organization, so
11 it is very -- there is no doubt in my mind
12 that she understood and embraced
13 the -- the responsibilities of the P and L
14 manager.

15 Q. Sir, if you can try to focus on
16 my question. I am not asking you what she
17 understood or what she embraced. I am
18 asking you did you ever give her a
19 document that described her increased job
20 responsibilities?

21 MR. GREEN: Objection. Asked
22 and answered. You may answer again, Mr.
23 Mills.

24 MR. SHERWOOD: You are asking
25 if there is a new job description. Is

1 MILLS

2 that what you are asking, Kevin?

3 MR. MINTZER: I think my
4 question stands. If you want to have it
5 read back.

6 (Record read.)

7 Q. Could you answer that question?

8 MR. GREEN: My objection --
9 asked and answered. You may answer again,
10 Mr. Mills.

11 A. I think I've already -- I think
12 I have already answered this.

13 Q. You said that were documents
14 created that bore on the budget process
15 and things that had to do with her new
16 responsibilities. I am asking you did you
17 give her a document at any point that
18 reflected -- that stated what her new job
19 responsibilities were. It is a yes or no
20 question, sir.

21 MR. GREEN: Same objection.
22 You may answer.

23 A. There was not a new operational
24 position description done, but it was made
25 clear to Ms. Browne-Sanders what her new

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responsibilities were.

Q. After the point that Ms. Browne-Sanders became head of business operations for the Knicks, did you come to have an opinion about her performance in that job?

A. At what point in time are you referring to?

Q. After she -- she got the job in 2002.

A. I thought --

Q. The promotion. After she got the promotion, did you come to have an opinion about -- I think you've testified about her performance in the VP of marketing job. Now, I am asking you about the -- her performance in the SVP position.

MR. GREEN: I object to the absence of time frame, Kevin.

MR. MINTZER: I gave the witness one.

Q. After she was promoted in 2002, did you come to have an opinion about her

1. MILLS

2. A. Yes.

3. Q. And that corresponded with, if
4. you look at the next page, it appears to
5. correspond with far exceeding -- far
6. exceeded expected performance; is that
7. correct?

8. A. Yes.

9. Q. And is that how you actually
10. viewed Ms. Browne-Sanders' performance at
11. the time?

12. A. Yes.

13. Q. Mr. Mills, did there come a
14. point where Ms. Browne-Sanders was fired
15. from MSG?

16. A. Yes.

17. Q. When was that?

18. A. I -- I don't know the specific
19. dates, but in, you know, January or
20. December -- January of '06.

21. Q. Why was she fired?

22. A. Well, first of all, Anucha came
23. to me and -- in late November and
24. expressed to me that she could no
25. longer -- felt that she could do her job

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2 at The Garden. She had felt that she had
3 tried do it in a number of ways, both
4 being aggressive and being passive, but
5 that she couldn't -- she lost the respect
6 of her -- her employees. She lost the
7 respect of her peers and that she couldn't
8 function in her job and that she needed my
9 help to find another job, and I agreed
10 with her, and -- and ultimately we -- she
11 was fired because she really was
12 not -- she was unable to -- to lead the
13 Knicks organization strategically and
14 grasp the concepts of managing the P and L
15 and being the complete -- the strategic
16 leader of the Knicks organization. She
17 also did not -- was unable to perform in
18 -- in the budget process, and the P and
19 L responsibilities of the Knicks. She
20 had, you know, disastrous budget meetings
21 during -- during -- during '05.

22 She had demonstrated an
23 inability to work with her peers and
24 manage her relationships across The Garden
25 from our advertising sales group to our

1 MILLS

2 facilities operations group to the
3 relationships within the basketball
4 operations department. She -- at that
5 point in time she became -- she refused to
6 be accountable for things that were
7 clearly in any kind -- any kind of
8 problems that remained she refused to take
9 accountability for -- for them, and in
10 some instances turned and would blame me
11 for in -- issues that were her
12 responsibility. So at that point, I
13 clearly lost faith in -- and confidence in
14 her ability to -- to continue in the job,
15 and she, you know -- she at that point,
16 you know, and over -- over -- over time
17 became very resistant to -- to -- to
18 criticism and opportunities to -- to
19 understanding what things needed to be
20 changed in order for us to move forward.

21 Q. Who decided to fire her?

22 A. Ultimately it was -- it was Jim
23 Dolan.

24 Q. Did he consult with you about
25 that?

1 MILLS

2 A. He -- he knew my concerns
3 about -- about what was going on with
4 Anucha, but ultimately he made the
5 decision to fire her.

6 Q. How did he know your concerns
7 about what was going on with
8 Ms. Browne-Sanders?

9 A. I -- actually, you know,
10 many -- I shared with him my opinions
11 about, A, her, you know -- you know, how
12 she -- how she was performing in some of
13 the budget meetings. I understood his
14 concerns as to -- you know, he and Hank
15 Ratner's concerns in terms of how
16 she -- how she performed in some of the
17 meetings and some of the challenges that
18 she was having, but
19 ultimately -- ultimately it was his
20 decision.

21 Q. But you -- when I asked you
22 originally why she was fired, you
23 proceeded to give me a whole list of
24 reasons why she was fired and did -- my
25 question is: Did you have discussions

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with Mr. Dolan about each of those reasons?

A. I had conversations with -- with Rusty McCormack about -- about those reasons, and, you know, I had conversations with Jim clearly about those views and clearly some of those reasons.

Q. So at some point you discussed with Mr. Dolan all of your concerns and criticisms about Mr. Browne-Sanders that you articulated in your previous answer?

MR. GREEN: Objection to form. You may answer, Mr. Mills.

A. Yes.

Q. But I take it from your answer that Mr. Dolan had the ultimate determination to -- whether to fire Ms. Browne-Sanders?

A. Absolutely.

Q. And so it's fair to say when I asked you why she was fired you don't know what was in Mr. Dolan's head when he decided to fire her; is that correct?

A. No, I don't know what was

1 MILLS

2 than we had been operating under with
3 Scott Laden in charge where he was -- he
4 was charged and he was focused on putting
5 the players in positions that they could
6 focus on basketball and concentrate on
7 winning basketball games.

8 Q. You say -- you are comparing it
9 to Mr. Laden. Mr. Laden had been the
10 previous GM of the Knicks?

11 A. Yes.

12 Q. And what -- how was it
13 different, Mr. Thomas' approach versus Mr.
14 Laden's approach, if you could describe
15 it?

16 A. Mr. -- Scott's approach was a
17 much more laid back approach with not as
18 many -- just a much more laid back
19 approach to -- to -- to managing the team
20 and managing the organization underneath
21 than Isiah. Isiah was more intense about
22 how he -- how he wanted to manage his
23 team. He was more focused in terms of
24 specifically making sure that the
25 basketball players and the basketball team

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was focused on doing what they had to do,
but in -- and what was -- what we needed
to do for the business but also for -- to
be focused on -- on -- on winning
basketball games.

Q. Did Mr. Thomas believe that the
players were not sufficiently focused
on -- on basketball when he came in?

MR. GREEN: Objection to form.
You may answer.

A. I don't know that he -- he felt
they were -- they were not sufficiently
focused on basketball, but we clearly had
an environment that wasn't as -- as
focused organizationally on winning
basketball games as it needed to be if you
were going to be successful.

Q. And how -- what was your
understanding of how he went about
instituting more of a focus
organizationally?

A. More structure around
the -- more structure around the players
over time instituting things like an

1 MILLS

2 expectations and a dress policy, institute
3 -- instituting sort of more regular
4 standards around what things were going on
5 with the -- with players around practices
6 and who was in the -- who was in
7 the -- the -- in the building
8 as -- as -- as players practiced, more
9 structure around how we were going to use
10 the players in activities, the timing of
11 how we would use -- would use players in
12 activities to make sure that the players
13 were at the critical points in the season
14 focused on the things that ultimately were
15 going to make us all successful, and that
16 was winning basketball games.

17 Q. Did you have any discussions
18 with Ms. Browne-Sanders at any point after
19 Mr. Thomas was brought on board about her
20 view of Mr. Thomas' changes?

21 A. The -- yes.

22 Q. And tell me what was said in
23 those conversations with -- by you and by
24 her.

25 A. You know, there were -- there

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2 were -- there were -- one instance in
3 particular where she came to me and she
4 told me that Isiah had -- had, you know,
5 informed her that the players were not
6 going to -- to make, you know, appearances
7 the way that they had made appearances
8 before, and he wanted a -- a more
9 structured -- more structured schedule
10 around it. You know, we had -- we had
11 numerous conversations about things like
12 that.

13 Q. Well, what did you say when she
14 said that to you?

15 A. I said that, you know, the
16 players are going to make the appearances
17 that -- that we need them to make, and we
18 need to strategically develop a plan
19 to -- to -- to -- to utilize the players,
20 but the players will make the appearances
21 that -- that organizationally we needed
22 them to make.

23 Q. Had she told you that Mr. Thomas
24 had said to the players that they wouldn't
25 be making any appearances?

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2 MR. GREEN: Objection to the
3 form. Asked and answered. You may answer
4 again, Mr. Mills.

5 A. Yes.

6 Q. And do you remember anything
7 that she said more specifically about it
8 other than -- other than what you've
9 already testified to?

10 A. Well, there -- the -- you know,
11 again there were -- there
12 were -- over -- over the course of time
13 there were -- were -- were many things
14 that I -- you know, I can't remember all
15 of them.

16 Q. Okay. Well, specifically on the
17 subject of Ms. Browne-Sanders' view of the
18 changes that Mr. Thomas brought to the
19 organization, other than what you have
20 said -- testified to, is there anything
21 else you recall her saying about it?

22 A. She wasn't happy with the
23 restrictions that he placed on -- on the
24 access that people had to the training
25 center.

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Q. What did she say about that?

A. She said that, you know, Isiah has limited access to certain parts of the training center to -- to only -- to only members of the basketball operations staff, and that she and her people needed to have access to the training center and -- in order to get players to do certain things, and that was a problem for her.

Q. And what did you say?

A. I spoke to Isiah about it, and Isiah said, listen, I -- I don't care if people come into the training center, you know, and -- as long as they're -- as they're professional and don't come in to the team while they are practicing, and they are not intrusive in terms of giving the players room to sort of be to themselves after practice, but to the extent that they need to come in to get things from the players or arrange for the players to do that he is more than willing to come up with a system to allow that to

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happen.

Q. Did you convey that to Ms. Browne-Sanders?

A. Absolutely.

Q. And what was her response to that?

A. She still was not -- not happy that there was sort of an unfiltered access to the training center, but Karen Buchholz and the people -- Dan Gladstone and those people who worked with her had no problems interacting with the players and maneuvering around the training center under sort of the rules that Isiah had outlined and accomplishing whatever they needed to get accomplished with the players.

Q. Anything else that you can recall about conversations that you had with Ms. Browne-Sanders about her views of the changes that Mr. Thomas implemented other than what you've already testified to?

A. There are -- there are -- there

1 MILLS

2 are -- I can't say that I am -- that this
3 covers all of the conversations about the
4 changes.

5 Q. Well, I -- I understand that,
6 but sitting here right now have you
7 testified fully to your recollection about
8 your conversations with Ms. Browne-Sanders
9 about the changes that Mrs. -- Mr. Thomas
10 had implemented?

11 A. Well, there were -- there were,
12 you know, again -- again, there were many,
13 many, changes. There were changes
14 in -- in terms of, you know, what
15 his -- what the basketball operations role
16 was going to be in the process of -- of
17 selling -- selling tickets and
18 incorporated in -- incorporated into
19 season ticket sponsorship activities that
20 included how we would include players
21 into -- into sponsorship activity, and
22 again ways that we would systematically
23 incorporate the basketball operations
24 staff and -- and the team itself
25 into -- into business initiatives, but

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they were going -- they were going to -- there was a framework that was going to be around that that was -- that was different.

Q. And you had discussions about that with Ms. Browne-Sanders, her view of that?

A. Absolutely.

Q. And what did Ms. Browne-Sanders say?

A. She -- she was not happy with the -- with the changes, but, you know, it -- in my opinion, those were -- those were the ones that I was endorsing in terms of what the -- what the -- what the right structure was going to be and how we should view the organization, so that we could move forward.

Q. You said that to Ms. Browne-Sanders?

A. Yes.

Q. Okay. Anything else that you recall about conversations that you had with her about her views of the changes

1. MILLS

2 Q. Okay. But did you have
3 conversations with Ms. Browne-Sanders
4 about the issues that she had raised in
5 the E mail?

6 A. Not specifically about those
7 issues.

8 Q. Did you generally have any
9 discussion with her about Frank Murphy?

10 A. Subsequent to that -- to
11 the -- to the E mail being -- Frank
12 sending the E mail to me, I had a meeting
13 with -- with Anucha and Isiah Thomas where
14 we talked about the roles and
15 responsibilities in the organization and
16 at the conclusion or during that meeting
17 we came to a -- you know, an -- an
18 understanding of how Frank and Anucha were
19 going to interact with each other moving
20 forward and what Frank's role was going to
21 be in interaction with Anucha.

22 Q. Okay. Aside from that
23 conversation, which I want to talk to you
24 about, that was among you, Mr. Thomas and
25 Ms. Browne-Sanders, did you have any other

1 MILLS

2 surprised to learn of it for the first
3 time in this E mail?

4 A. Yes.

5 Q. But you did not have -- you
6 don't recall having any conversations with
7 Ms. Browne-Sanders in which you said in
8 substance why have you told Frank that you
9 told me about this?

10 A. No.

11 MR. GREEN: Objection to form.
12 You can answer.

13 A. No. The conversation -- the
14 conversation we had was again -- something
15 was elevated in terms of the -- the roles
16 and responsibilities which Anucha
17 did -- did raise with me between she and
18 Isiah, and we had a meeting, and we talked
19 about how Frank and Anucha were going to
20 be able to interact with each other and
21 that became the issue that same day that
22 we -- that we became focused on it and
23 that we dealt with it.

24 Q. Okay. When you read in the E
25 mail that Mrs. Browne-Sanders was saying

1 MILLS

2 that Mr. Murphy had threatened her, did
3 you do anything to inquire about what the
4 nature of that threat was supposed to have
5 been?

6 A. I talked to -- to Anucha and
7 Isiah in the meeting about how I wanted
8 the two of their departments to work
9 together -- work together, and we talked
10 about them -- that Frank being the -- the
11 liaison between the two of them and that,
12 you know, that their interactions with
13 each other were always going to have to be
14 professional and respectful.

15 Q. Right. I understand that, but
16 did you say to Ms. Browne-Sanders at any
17 point what do you mean he threatened you
18 or make any inquiry about what she was
19 referring to there?

20 A. No, I didn't. I focused in --
21 in the same meeting we had the next day we
22 focused on how the two of them were going
23 to work together and was she satisfied
24 with the -- with the structure and the
25 interaction -- the methods of interaction

1 MILLS

2 that we had had created for the two of
3 them, and this happened -- the two things
4 happened almost simultaneously. So we
5 never got to discuss this particular
6 instance.

7 Q. Do you think you received this E
8 mail before you had the meeting with Mr.
9 Thomas and Ms. Browne-Sanders?

10 A. I can't -- I can't remember if I
11 received -- received it -- if I received
12 it before or right after. I just
13 can't -- I can't remember.

14 Q. Somewhere around the time of the
15 meeting?

16 A. Yes.

17 Q. And what -- you've touched on
18 it, but I'd like to get your full
19 recollection of what was discussed in the
20 meeting among you, Ms. Browne-Sanders and
21 Mr. Thomas. I guess first though why
22 don't you tell me how it did it come to be
23 that you were meeting with the two of
24 them?

25 A. Anucha called me and said that,

MILLS

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2 you know, she had a discussion with Isiah,
3 and, you know, it is clear that there is
4 some misunderstanding about her roles and
5 her -- his role and her roles, and he
6 clearly thinks that he is involved with
7 more than basketball, and unless there is
8 something that I told him is part of his
9 job that I haven't shared with her she
10 didn't understand what was going on and
11 really would like to have a meeting either
12 way for me to clarify everyone's roles and
13 responsibilities and how we were going to
14 move forward.

15 Q. And did you say anything in that
16 conversation?

17 A. I said -- I said, you know, that
18 Isiah is responsible for basketball. He
19 has no business responsibilities in the
20 organization, and if for some reason you
21 should -- you know, you should -- I
22 assured her that I had -- had not -- you
23 know, there were no expansion of Isiah's
24 responsibilities, and that if there was
25 some -- some misunderstanding between the

1 MILLS

2 two of them I thought it would be very
3 good for us to get together and clear it
4 up.

5 Q. Okay. And did you then have the
6 meeting with the three of them?

7 A. Yes, I did.

8 Q. The three of you.

9 Did Ms. Browne-Sanders say
10 anything else in that telephone
11 conversation other than what
12 you've -- you've said?

13 A. Not that I can -- no.

14 Q. Now, if you can tell me
15 what -- what was discussed in the meeting
16 among you, Ms. Browne-Sanders and Mr.
17 Thomas?

18 A. Well, we discussed the -- the
19 roles and responsibilities and Anucha
20 mentioned that, you know, Isiah had -- had
21 informed her that he -- that his roles, he
22 thought that his role incorporated more
23 than just managing the basketball
24 operations of the team, and I said to him
25 in that meeting you're -- you're wrong.

MILLS

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2 Your responsibilities are the basketball
3 operations of the team. You don't have a
4 responsibility in -- in the business
5 operations of the team. You don't have a
6 say over, you know, what the game
7 presentation is. You're managing
8 the -- the infrastructure of the
9 basketball organization, the scheduling of
10 the basketball games, and Anucha is
11 responsible for the day-to-day business
12 operations. He said well, you know, I
13 thought that I had -- there was -- I had
14 more input in different places, but if
15 that's the way it is, that's the way it
16 is, and I'm -- I'm willing to move forward
17 and accept that that's the way it is.

18 Q. Did Ms. Browne-Sanders say
19 anything in the meeting?

20 A. She wanted to know how we are
21 going -- what was going to be the
22 structure in terms of moving forward, how
23 the two organizations were going to
24 function and operate, you know, together
25 and -- and Isiah designated -- he said

1 MILLS

2 well I don't -- I don't want to be the
3 person that has to funnel every player
4 request through and every time, you know,
5 for a business initiative a player needs
6 to go to a school or if a player needs to
7 go on an ad sales call or if a player
8 needs to appear in a television commercial
9 I don't -- I am not going to be the person
10 that each one of those individual requests
11 come across my desk and that -- and that I
12 am going to designate someone, the group,
13 and it is going to be Frank Murphy as the
14 person that is going to be my liaison with
15 the business operations group.

16 Q. Was anything else said in the
17 meeting that you recall?

18 A. I mean we -- we -- we probably
19 discussed, you know, other issues in -- in
20 the meeting, but those were
21 clearly -- that was -- that was the focal
22 point of the meeting of deciding -- that
23 was the initial intent of the meeting was
24 to, you know, establish everyone's
25 responsibilities as -- in terms of how

1 MILLS

2 they would interact and in -- you know, to
3 really make sure that Isiah understood
4 what Anucha's role was because clearly
5 based on her request to me he didn't, and
6 so I wanted to make sure we clarified
7 that.

8 Q. And did it appear to you in the
9 meeting based on Mr. Thomas'
10 conduct -- comments that he did have some
11 misunderstanding about what
12 Ms. Browne-Sanders' role was?

13 A. I thought that -- I did sense
14 that he thought he had more of a say in
15 certain things as related to, you know,
16 that presentation and things like that,
17 but, you know, I was very clear about
18 that, and -- and at the end of the day he
19 understood what his role was, and Anucha
20 understood there was no change. She
21 understood what her role -- she -- the
22 role she thought she had was
23 reestablished.

24 Q. Did you have to step out of the
25 meeting at any point to take a phone call?

1 MILLS

2 A. Yes, I did.

3 Q. And who -- who was the phone
4 call from?

5 A. I -- I don't remember.

6 Q. Did you have any discussions
7 with Ms. Browne-Sanders after the meeting?

8 A. Yes. In fact I asked her to
9 stay -- after the meeting was over I asked
10 her to stay behind to -- to talk to me.

11 Q. And what would -- what did you
12 two discuss at that point?

13 A. I said to her that, you know, we
14 started out this meeting with you having
15 concerns about Isiah sort of overreaching
16 into your areas, and in my opinion we
17 clarified everything to your
18 understanding, and I thought in
19 the -- over the course of the meeting you
20 were overly aggressive in dealing with
21 him, that -- you know, I have to say that
22 you -- that it seemed like everything you
23 wanted coming out of this -- that you
24 wanted going into the meeting you got, but
25 I thought you were pretty -- pretty

1 MILLS

2 the on court experience, that tone in --
3 as we sort of discussed the issues that
4 were gray in Isiah's mind before he walked
5 in the door.

6 Q. Did it seem that
7 Ms. Browne-Sanders was agitated?

8 A. Yeah. I said she -- she -- it
9 seemed like she was clearly upset in
10 calling for the meeting because I -- there
11 was a misunderstanding, and she was
12 concerned that maybe her job
13 responsibilities had changed. So that was
14 clearly important for her to come into
15 this meeting and have it reaffirmed, the
16 scope of her job and to affirm the scope
17 of Isiah's job.

18 Q. At any point did Mr. Thomas
19 complain to you about Ms. Browne-Sanders?

20 MR. GREEN: Objection to form.
21 Any time frame?

22 MR. MINTZER: Any time. Was
23 that -- was that the only basis of the
24 objection.

25 MR. GREEN: Yes.

MILLS

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2 Q. So we clarified that. At any
3 point.

4 A. He -- he complained that, you
5 know -- that there -- there were times
6 when it appeared that he was being, you
7 know -- that there were certain things
8 that he didn't want to be involved in that
9 Anucha was -- was outlining or requesting
10 that he be involved in. He made it clear
11 to me that he did not want to be a person
12 who was out selling season tickets. He
13 didn't want to be a guy who in -- sending
14 letters to season ticket holders asking
15 them to please renew their tickets
16 sincerely Isiah Thomas. He -- and it
17 seemed that Anucha wanted to include him
18 in things like that -- that -- that
19 troubled him. He said -- he was always
20 clear I want to do whatever I can do to
21 support the organization, but I don't -- I
22 don't want to be in the business of -- of
23 selling tickets, and he told me that, you
24 know, that's something Willis Reid has
25 shared with him in -- when he came in and

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was working with Anucha and -- and Scott Laden. He said that if you're not careful in the organization they will turn you into a pitch man to sell tickets, and you have to find a way to stay focused on basketball and -- and so that was -- that was a complaint of his. He said he would be more than happy to make sure that whenever we needed him to tell -- to communicate to people about what was going on with the team, how we're building the team, what our expectations about the team were, he would be more than happy to participate in that and use that to support our -- our business, but he didn't want to be in the business of sort of being a salesperson.

Q. Mr. Thomas' comment about Willis Reid, would -- and correct me if I am wrong, I want to make sure I understand this right. Was he saying that Ms. Browne-Sanders had made according to Mr. Reid Mr. Reid into a -- you know, a salesperson or a pitch man?

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Q. Did Ms. Browne-Sanders ever express any complaint to you in, you know, words or substance that she didn't like being excluded from the basketball operations role that she had had under Mr. Laden?

A. She didn't like the idea that she wasn't more involved in -- in the scheduling, and she was -- you know, the preseason scheduling, the scheduling of -- of games. She -- she didn't like that she was -- that she wasn't involved -- more involved in it, but, you know, I explained that that is a thing that -- you know, it is really a basketball operations function.

When I worked for the Knicks, Scott wasn't particularly interested in doing -- doing that, so I -- I performed that function when I took on a different role. Anucha performed some of those same responsibilities for Scott, but it really, you know, is more logically and more naturally a function of the basketball

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operations group, and it is something that she was involved in and I think enjoyed doing. So she wasn't excited about not being involved in it, but that was the way it was.

Q. Had you had scheduling responsibilities when you were on -- in your previous position with -- for -- for just the Knicks organization?

A. I worked in conjunction with Scott on the scheduling, but I was a lead person on it.

Q. I am sorry. The last --

A. I was a lead person.

Q. A lead. Was Ms. Browne-Sanders to your knowledge ever a lead person on it?

A. She was -- she was actively involved in the -- in the scheduling.

Q. The scheduling related in some part to when, you know, player appearances and community events could take place, correct?

A. No, I'm talking about game

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MILLS

Ms. Browne-Sanders about Mr. Thomas' hesitancy at being involved in business front office operation matters?

MR. GREEN: Objection to form. You may answer, Mr. Mills.

A. I -- I had conversations with -- with Anucha regarding again giving -- given that we were moving into a more difficult period of time with -- with the Knicks that I -- that there were things that I needed a comprehensive strategy as to how she was going -- how she was going to incorporate Isiah and the basketball operations staff of the team into -- into business initiatives.

Q. Did you ever have occasion to tell Ms. Browne-Sanders that you didn't want to continue to be the intermediary between her and Ms. -- Mr. Thomas?

A. Yes.

Q. And tell me the circumstances of that.

A. That she was -- she would complain that there were certain things

1 MILLS

2 that she wanted to get done or there would
3 be a session that was scheduled and then
4 ultimately cancelled, and I -- I explained
5 to her that -- that, you know, at -- at
6 some point I was not going to continue to
7 be the person making the decisions or
8 ultimately having to -- to make sure all
9 of these things were executed upon, and
10 she needed to develop a strategy for
11 either herself or the people underneath
12 her to find a way to -- to get the
13 initiatives with the basketball team done,
14 and that that wasn't an efficient use of
15 my time to be the person ultimately making
16 all those decisions.

17 Q. Well, Ms. Browne-Sanders had
18 been asking you to be an intermediary and
19 to talk to Mr. Thomas about doing the
20 things that related to the business
21 activities of the team that
22 Ms. Browne-Sanders thought needed to be
23 down. Isn't that true?

24 MR. GREEN: Objection to form.
25 You may answer, Mr. Mills.

1 MILLS

2 A. You know I -- what -- what I
3 asked Anucha to do was to develop a
4 comprehensive strategy that incorporated
5 what things needed to be done in order to
6 move business forward, and so I wanted her
7 to develop those -- those kinds of things
8 to determine how we were going to use
9 Isiah and the -- the coaching staff and
10 the Knicks team. For instance, you know,
11 there were some things that Anucha came
12 forward with that, you know, I think -- I
13 don't know whether she presented them to
14 Isiah or not -- but in my view were
15 inefficient uses of his team time. I
16 wanted her to come up with things that
17 were appropriate for the business
18 objectives of the team and also of
19 valuable use of his team time and the
20 players and the basketball organization's
21 time.

22 Q. Ms. Browne-Sanders made you
23 aware that she was having difficulty
24 getting Mr. Thomas to confirm his
25 availability for -- for events; isn't that

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of regular updates and feedback opportunities. So that he could have as -- have his hand more in the sense of what was going on or just have in the sense -- on the sense of what was happening with his business.

Q. Did anything come up in this meeting about Mr. Thomas' use of locker room language?

A. No.

Q. Did you ever have a discussion with anyone about Mr. Thomas using locker room language?

MR. GREEN: Objection to form.

A. No.

Q. Did Ms. -- did [REDACTED] ever tell you that she didn't want to report to Frank Murphy?

A. No.

Q. Did [REDACTED] ever express any concerns to you about Frank Murphy?

A. No.

Q. Did you become aware from any source other than counsel that Ms. -- that

1. MILLS

2 with Hank about that, and I had already
3 known that Hank was not a fan of Anucha's,
4 and I had the conversation with him. He
5 said you should get to Rusty, so that we
6 can figure out a way -- how to accomodate
7 this and accomodate her, and so I had a
8 conversation with Rusty.

9 Q. And what was your conversation
10 with Mr. McCormack; what did you say and
11 what did he say?

12 A. I said that Anucha came to me
13 and said she couldn't do this,
14 couldn't -- couldn't do this any more.
15 She -- I recounted that she had lost the
16 confidence of the people that -- that
17 worked for her and that she wanted -- she
18 couldn't do it, and I agreed, and that she
19 needed to -- to have a job while she went
20 out and -- and looked for another job, and
21 I spoke to Hank, and I -- and -- you know,
22 we should start working on a -- a plan.

23 Q. Right. I think I understood
24 that, but I was asking you about your
25 conversation with -- were you just

MILLS

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2 testifying now as to your conversation
3 with Mr. McCormack?

4 A. Yes.

5 Q. Okay. In your -- in your
6 conversation with Mr. McCormack, you told
7 him about the conversation you had with
8 Ms. Browne-Sanders. You recounted for him
9 that you had the conversation with Mr.
10 Ratner, correct?

11 A. Yes.

12 Q. Okay. And then did Mr.
13 McCormack say anything in this
14 conversation?

15 A. He said okay I'll -- I'll work
16 on it.

17 Q. Did he tell you what he was
18 going to work on?

19 A. We didn't talk about what the
20 specifics of what he was going to work on.

21 Q. Did you have an understanding of
22 what -- what he was going to work on?

23 A. I told him that I wanted some
24 kind of transition plan and some kind
25 of -- that we had to develop some kind of

1 MILLS

2 package for her that would put her in a
3 position to -- to move on.

4 Q. When did you have this
5 discussion with Mr. McCormack?

6 A. It was -- it was sometime
7 in -- sometime in -- in late November.

8 Q. Did Mr. McCormack ever follow-up
9 with you about what kind of transition
10 plan he was putting together?

11 A. No, I think it was -- you know,
12 there was -- it was soon after that that
13 we -- we were contacted by -- by Anucha's
14 attorneys.

15 Q. When you say soon after, do you
16 know how long after?

17 A. I really -- I really don't.

18 Q. Was it several weeks?

19 A. I really can't remember.

20 Q. Okay. But whatever that time
21 period was, you never got any follow-up
22 from Mr. McCormack about what he was doing
23 to implement the transition plan?

24 A. No.

25 Q. Did you ever see any document

1. MILLS

2 MR. GREEN: Well, I'm not going
3 to object to your placing him in that
4 room. I just don't want him to slip into
5 a conversation that reveals a privileged
6 communication. So I'm not going to object
7 to your asking him where he was or how he
8 came to learn, who was present at the
9 time. That was perfectly fine.

10 Could you tell me what the
11 question was that we started on this.

12 (Record read.)

13 THE VIDEOGRAPHER: We are back
14 on the record. The time is 4:18.

15 Q. Do you recall being in a room
16 with John Moran in which the subject of
17 Ms. Browne-Sanders having retained an
18 attorney was discussed?

19 A. I -- I don't remember being in a
20 room with him discussing that or that
21 being discussed.

22 Q. Do you recall Mr. Moran telling
23 you that he was going to proceed with an
24 investigation?

25 A. I -- I remember, you know, that

MILLS

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2 we were -- that we are going -- that we
3 were going to investigate
4 what -- what -- what the circumstances
5 behind the -- the -- the Hassan Gonsalves
6 incident, and John Moran was
7 going -- there was an investigation taking
8 place as part of that.

9 Q. Yeah. Do you remember Mr. Moran
10 ever telling you that he was going to
11 investigate the -- the allegations made by
12 Ms. Browne-Sanders about the -- the
13 treatment that she had claimed to
14 experience?

15 A. I can't remember whether
16 we -- we sat in a room, and he informed me
17 that.

18 Q. Okay. So -- and to be clear, is
19 it your testimony that you don't recall
20 how you learned that Ms. Browne-Sanders
21 retained a lawyer?

22 A. Yes.

23 Q. Yes, you don't recall?

24 A. I do -- at this point in time
25 I -- I don't remember when I was -- when

1 MILLS

2 or who told me that.

3 Q. The conversation in which
4 Ms. Browne-Sanders supposedly said to you
5 that she couldn't do her job any more,
6 where did that take place?

7 A. It took place in my office.

8 Q. And was anyone else present?

9 A. No.

10 Q. Was the door closed?

11 A. I believe the door was closed.

12 Q. Do you recall what day of the
13 week it was?

14 A. No.

15 Q. Can you tell me everything that
16 you recall being said in that
17 conversation?

18 A. I -- I recall her walking into
19 my office saying that we have, you know,
20 an explosive situation,
21 that -- regarding -- regarding the Knicks.
22 I can't -- you know, I've lost the
23 confidence of our staff. I can't do this.
24 I can't do this any more. I can't do this
25 job any more. I've tried every way I can.

MILLS

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2 I have tried to be passive. I have tried
3 to be aggressive, but I can't do this, and
4 I need your help. I need to be able
5 to -- to have this job while I go find
6 another one, and I need your help, and I
7 said I understand, and then -- that
8 I -- that I would do what I could to help
9 her.

10 Q. Was anything else said in the
11 conversation?

12 A. That's -- that's the -- that's
13 what I can remember.

14 Q. Did Ms. Browne-Sanders express
15 any concerns about her security or her
16 safety during that conversation?

17 A. No, not that I can remember. No
18 -- you know, no, she didn't talk to me
19 about security or safety at that point.

20 Q. This conversation, was this at
21 or around the time that Ms. Browne-Sanders
22 had made you aware that Hassan Gonsalves
23 had been sexually harassing members of her
24 staff?

25 A. It was sometime -- sometime I

MILLS

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2 the day she had lost the confidence or was
3 going to have a very difficult time
4 working with Dan, and Dan was going to
5 have a very difficult time working with
6 her, and I -- you know, there were many,
7 many shortcomings, and there were many,
8 many issues that had come up around
9 Anucha's ability to manage
10 through -- through the Knicks's
11 organization and through other
12 organizations, and when there are
13 instances like the open practice issue
14 comes up, and I call a meeting, and I am
15 -- I have people from her organization
16 come, people from the facilities
17 organization come, and it is clear that I
18 have some real questions and real concerns
19 about how an incident -- an incident like
20 that comes to fruition and really
21 challenging her and challenging what
22 really happened in situations like that,
23 the people in her -- that she invited to
24 the meeting they saw what -- what my view
25 of what was going on in the Knicks

1 MILLS

2 organization at that point,

3 MR. MINTZER: Could you read
4 back my question if you --

5 Q. You were done?

6 A. Yes.

7 (Record read.)

8 Q. And then I said did you ask, and
9 the answer to that is you didn't ask?

10 A. No. I assume she -- she was
11 referring -- I assume she was referring to
12 multiple -- multiple people.

13 Q. And in your -- in your answer
14 you referred to an E mail from Gladstone.
15 What E mail are you -- are you talking
16 about?

17 A. The -- I received a -- a copy of
18 an E mail from -- from Anucha regarding
19 comments that -- that Stephon Marbury made
20 to Dan Gladstone at some point in
21 the -- in the summer.

22 Q. And so you received that E mail
23 before the conversation with
24 Ms. Browne-Sanders in which she told you
25 supposedly that she couldn't do her job

1 MILLS

2 any more?

3 A. I believe I did.

4 Q. All right. And you could tell
5 by the E mail that Mr. Gladstone had sent
6 to Ms. Browne-Sanders that she forwarded
7 to you that Mr. -- Mr. Gladstone wouldn't
8 be able to continue to work for
9 Ms. Browne-Sanders any more?

10 MR. GREEN: Objection to form.
11 You may answer, Mr. Mills.

12 A. I absolutely looked at
13 when -- there was an -- there was an
14 instance of sexual -- you know, a sexual
15 harassment claim against Hassan by a
16 number of female employees that I agreed
17 immediately when Anucha brought to my
18 attention that we needed to act on it, and
19 we needed to fire Hassan, but at the same
20 time to start bringing in E mails about
21 conversations that have -- that have
22 absolutely nothing to do with that
23 particular claim regarding comments that a
24 player made to an employee, it clearly
25 impacts, you know, I think the ability

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of -- of that -- that employee to feel like he can -- he can move -- move forward working with a supervisor that asked him to put stuff -- put things like that in writing that had nothing to do with a claim that -- that we had -- that was raised and we dealt with.

Q. What was the relationship between Mr. Marbury and Mr. Hassan Gonsalves, if you know?

A. They were -- they were either -- I don't know if they were -- grew up together, if they were cousins or friends. It -- but they -- there was -- there was definitely a relationship and -- and Hassan was someone that Stephon had -- had brought -- had requested that we hire.

Q. Mr. Gladstone had told Ms. Browne-Sanders and she relayed to you that Mr. Marbury was upset that Mr. Gonsalves had been disciplined when he forged his manager's signature; is that -- is that correct?

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Q. And what, if anything, did you do to address the fact that Mr. Marbury had made those comments or allegedly made those comments?

A. Well, I -- I knew it -- you know, at some point as we got through the investigation we would find out if he actually said them and -- and decide what -- what conversation we should have with him and what we couldn't go back to him about.

Q. Including the investigation you are referring -- the investigation you are referring to is the Hassan Gonsalves investigation?

A. Yes.

Q. And did anyone get back to you with the results of that investigation as to whether Marbury had in fact made those comments?

A. No one got back to me on comments regarding Stephon.

Q. Did you ever ask anyone, hey, whatever happened -- are you we doing

1 MILLS

2 anything about Marbury's comments and what
3 he said about Anucha?

4 A. I think things were in -- were
5 happening so quickly, so I did not get
6 back to anyone, and I -- you know, that
7 was one that was in the hands of our human
8 resources department, and they would
9 initiate the investigations that were
10 appropriate in looking into those
11 comments.

12 Q. What do you mean that things
13 were happening so quickly? What was
14 happening so quickly?

15 A. We -- we -- we -- we
16 terminated -- we terminated Hassan very
17 quickly I think, right before that
18 we -- we -- we terminated Vernon Manuel,
19 and we -- we were in a situation where
20 Anucha had come to me and said that
21 she -- that she couldn't perform in this
22 job, and I was focused on that, and then
23 subsequently after that we were -- we were
24 informed that -- we were contacted
25 by -- by our lawyers.

MILLS

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2 Q. Did you do anything to help
3 Ms. Browne-Sanders find a job outside of
4 Madison Square Garden?

5 A. No. By the time this -- all of
6 this happened so quickly, the conversation
7 that she had with me telling me she
8 couldn't -- she couldn't do this any more
9 to the time that this was -- we were
10 contacted by the law firm, and this was
11 in -- you know, being handled by our
12 lawyers, it was a matter of, you know, a
13 week or two weeks. I don't -- it was a
14 short period of time, so there was no
15 opportunity. What I did do was that
16 Anucha was scheduled to go to -- to NBA
17 league meetings. I believe they were in
18 Florida, and it -- I thought it was
19 important that she be able to attend those
20 meetings even though she had told me that
21 she could no longer do this job and
22 was -- and wanted to be able -- we had to
23 find a way for her to leave. I thought in
24 order to preserve her position within the
25 NBA that it -- that it was important to

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2 allow her to go attend those meetings and
3 represent the Knicks, so that as we went
4 through a process of finding something
5 else or her finding something else that
6 there -- that we tried everything we could
7 to make it as seamless as possible to the
8 external world.

9 Q. When Ms. Browne-Sanders had her
10 counsel contact MSG, did she return to
11 Madison Square Garden's offices at any
12 point after that?

13 A. Yeah. I -- I can't remember if
14 she did or not.

15 Q. Did you ever have discussions
16 with anyone about whether
17 Ms. Browne-Sanders would be in the office
18 while her complaint was being
19 investigated?

20 MR. GREEN: Let me object and
21 advise the witness he may not respond to
22 the extent such discussions, if they were
23 held, were held with counsel or with
24 counsel present; otherwise, he may
25 respond.

1 MILLS

2 sold her out in the meeting, and it was my
3 responsibility to step up and answer the
4 questions as it related to Last Man
5 Standing.

6 So Anucha and I had -- had a
7 meeting to discuss that issue, and
8 I -- you know, I informed her that we had
9 a very big disconnect, and that if there
10 was any way that she thought that she was
11 not responsible for that event and for
12 the -- the financial management of that
13 event that I didn't know where she got
14 that opinion from, but I wanted to -- to
15 straighten it out. There was no -- that
16 event was her responsibility, and she is
17 responsible for managing the expenses of
18 it, and, you know, these were the kinds of
19 discussions that were -- Anucha and I were
20 having throughout 2005 to the extent that,
21 you know, there was at least on one
22 occasion where she left my office and
23 she -- she looked at me and said am I ever
24 going to leave your office and feel good
25 about myself.

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So there were a series of -- of incidents that took place throughout 2005 that were really problematic for my relationship with Anucha and her -- her -- you know, her performance in -- in the job in 2005.

MR. MINTZER: Could you read back my question.

(Record read.)

Q. I know that you had some things that you wanted to say. Now could you answer my question?

MR. GREEN: Objection. There is no reason to be sarcastic, Kevin.

MR. MINTZER: It is not because we are going to be here longer --

MR. GREEN: You are going to be hear as long as you want to keep him up to the maximum amount of time.

MR. MINTZER: That is fine, but if the question wasn't --

MS. LYNCH: I believe it has been asked and answered. I think he answered at the beginning.

1 MILLS

2 not -- were not managed well?

3 A. I would have to --

4 MR. GREEN: Objection to form.

5 You may answer, Mr. Mills.

6 A. I would have to look at the -- I
7 would have to look at the overall P & L of
8 the team and to go through the specifics
9 of it.

10 Q. The largest expense as I think
11 you referred to earlier in your testimony
12 is the Knicks players salary and luxury
13 tax paid on players' salary; is that
14 right?

15 A. That is the large -- that is the
16 largest expense in the team portfolio.

17 Q. You said that you had some
18 conversations with Mr. Dolan, Mr. Ratner
19 about providing training to
20 Ms. Browne-Sanders?

21 A. Yes.

22 Q. And could you tell me what was
23 said in those conversations?

24 A. We -- we had a strategies and
25 tactics and goal planning meeting, and

MILLS

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2 there were some -- and there -- it was a
3 meeting where Anucha wasn't able to -- to
4 satisfactorily answer some of the
5 questions that Jim and -- and Hank had.
6 Jim made a decision that we should move --
7 we shouldn't move forward with the meeting
8 any longer and left the room and went into
9 his office, went -- he went in with Hank,
10 and then, you know, some minutes later
11 they asked me to come into the office
12 and -- and Hank said that -- in that -- in
13 there that, you know, Anucha isn't
14 grasping what we are trying to get done.
15 She is not receptive. She is not
16 listening. She is -- she is not grasping
17 what we are trying to do, and I -- you
18 know, I don't think she -- she can make it
19 here. Jim said, well, she is -- she
20 is -- this is a -- a big job, and we
21 shouldn't just make a judgment like that.
22 She has been successful here up until this
23 point through prior -- prior years and
24 rather than -- than terminate someone we
25 should find some courses and see if we can

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1 MILLS

2 give her some training and, he asked me
3 what my thoughts were, and I said well I
4 would like to -- I'm not sure whether she
5 is going -- whether she is going to grasp
6 everything, but I would like to try and
7 see if we can -- we can get training
8 to -- to help her in this area. Jim asked
9 me to speak with -- to get together with
10 Pete Olsen and have Pete design -- find
11 some courses that she could take and send
12 it around the -- the budget process and
13 marketing as -- as it interacts and
14 intersects with the budget process, and
15 that is what we did.

16 Q. What were the subjects that Mr.
17 Dolan said that she needed training on?

18 A. This was -- this was around
19 the -- the process, budget process and
20 marketing as it -- as it related to
21 supporting a budget -- supporting the
22 budget process and building -- building a
23 strategy and a brand for the budget.

24 Q. When you say building a brand
25 for the budget, what does that refer to?

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else?

A. There might be things that I'm -- that I'm not thinking of right now.

Q. Right. But nothing else for the moment comes to mind?

A. You know, there -- there may be other things that I'm -- that I'm not thinking about, but this is it right at this moment in time.

Q. Did Mrs. Browne-Sanders ever communicate to you that Isiah Thomas had acted inappropriate to her?

A. No. Other than there -- there was an E mail I did receive -- received from her, you know, at -- and I am trying to think of the exact date. I remember it was in -- sometime late in November there was an E mail she sent to me saying that Isiah had -- I can't remember the specifics of the E mail, but that Isiah had given her a hug and, you know, in -- in gate one, and, you know, I -- I don't want him to -- doing these kinds of things. Maybe he did it in front -- in

1 MILLS

2 front of Jerome Williams. I do -- I do
3 remember that, and -- and when I received
4 it I -- I had a conversation with Isiah
5 and asked him did he give -- did he give
6 Anucha a hug, and he told me he had, and
7 that I said listen she -- she -- she sent
8 me an E mail. She didn't think it
9 was -- she doesn't -- she doesn't want you
10 doing that to her. She didn't feel like
11 it was appropriate. So don't do that any
12 more.

13 Q. Did you ever respond back to
14 Ms. Browne-Sanders about that?

15 A. No, I did not.

16 Q. Why not?

17 A. I -- I -- when I received the E
18 mail I thought it was -- it was most
19 important that -- that I talk to Isiah and
20 get him to stop. The next time I saw
21 Anucha was actually at the -- you know, I
22 was -- I was in Phoenix with -- a board of
23 governors meeting in Scottsdale with the
24 NHL, and I flew back, and the next time I
25 saw Anucha was at an event at The Garden.

1 MILLS

2 You may answer.

3 A. Yeah, the -- Anucha had -- had
4 mentioned to me at some point earlier, I
5 don't remember the exact timing that Isiah
6 had asked Petra Pope to go into the -- the
7 referees' dressing -- locker room area
8 where they -- where they have their food
9 and -- and things like that and stick her
10 head in and check in to see if everything
11 was okay with the referees, if they needed
12 anything else. Anucha said to me that,
13 you know, that is really not part of
14 Petra's job. I said you know what, I
15 agree with you. You know, the -- I don't
16 know if Isiah asked her do that. I don't
17 know why and I don't think he should, so
18 I'm going to take care of it. I will talk
19 to Isiah which I did. I asked him did you
20 ask Petra to do this, and he said yes. He
21 said you know she is someone that has been
22 around the league a long time. All the
23 referees know her. We have spent a lot of
24 money renting furniture, ordering
25 additional food, trying to make the

1 MILLS

2 you about Mr. Thomas' conduct at any other
3 time during her employment at MSG?

4 A. Not that I can -- not at that I
5 can recall.

6 Q. Did Ms. Browne-Sanders ever tell
7 that Mr. Thomas needed sexual harassment
8 training?

9 A. No.

10 Q. Did she ever tell you that he
11 had said that he loved her?

12 A. No.

13 Q. Did she ever tell you that
14 they -- that Mr. Thomas had suggested that
15 the two of them meet off site for any
16 reason?

17 A. No.

18 (Mills Exhibit 16 marked for
19 identification.)

20 (Document handed to witness.)

21 Q. I have given you a document that
22 -- that has been marked for identification
23 as Mills Exhibit 16, Bates stamp PL 00286.

24 Have you had a chance to look at
25 it, Mr. Mills?

1 MILLS

2 (Pause.)

3 A. Yes.

4 Q. Does this refresh your
5 recollection about the timing of when
6 Ms. Browne-Sanders sent you this E mail?

7 A. Yes.

8 Q. And you recall getting it on or
9 about December 15?

10 A. Yes.

11 Q. This is the E mail that you were
12 referring to before when you said you
13 received an E mail about -- of concerns
14 from Ms. Browne-Sanders about Mr. Thomas
15 hugging her?

16 A. Yes.

17 Q. And so the record is clear you
18 never responded to Ms. Browne-Sanders, to
19 this E mail?

20 A. The -- what I did with
21 this -- in -- what I did when I received
22 this E mail was speak to Mr. -- Mr. -- Mr.
23 Thomas and tell him that he shouldn't do
24 this.

25 Q. Right. Okay. That is quite