

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
06 Civ. 0589 (CGE)

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ANUCHA BROWNE-SANDERS,

Plaintiff,

- against -

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

Defendants.

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November 10, 2006
10:10 a.m.

VIDEOTAPE DEPOSITION of JOHN D.
MORAN, 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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MORAN

A. This year I was involved in a -- the complainant didn't refer to it as sexual harassment but complained of unwanted -- unwanted touching and things of that nature.

Q. What part of MSG did the person work in who made the complaint?

A. Faye Brown, New York Knicks.

Q. Did you -- did you investigate that?

A. Yes, I did.

Q. Did you take any notes of that?

A. Yes, I did.

MR. MINTZER: We would call for the production of those notes consistent with what you have produced, and I think what -- there is no dispute about what the court said was to be provided on -- on that issue.

MR. GREEN: Well, I'm not sure I agree with that, Kevin. I thought that you are limited to documents reflecting any complaints implicating Mr. Mills or Mr. Dolan.

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be, and we proceed to interview them around the allegations.

Q. Have you been involved in any investigations in which you did not interview the person accused of misconduct?

A. Yes.

Q. What were those instances?

A. One that I can recall, the individual's name was Hassan Gonsalves.

Q. Mr. Gonsalves was alleged to have engaged in sexual harassment?

A. Yes.

Q. You were involved in that investigation?

A. Yes, I was.

Q. Did you do that investigation with anyone else?

A. Well, that -- that is a complicated question, but I will try to answer it.

The reason I say it got complicated was that I received a phone call from Anucha Browne-Sanders saying

MORAN

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2 that there was an issue in her area, and
3 that in fact she had -- by the time she
4 had called me she had already investigated
5 it, which -- which was a problem for me
6 because that is not the process. The
7 process is that if she receives a
8 complaint, she should bring her complaint
9 to me, and I'm to do the investigating,
10 and the reason I say that was a problem
11 was because the individuals she was
12 interviewing were people in her
13 department. They have to work together.
14 They have a personal relationship. It's,
15 you know, in a sense that -- and I don't
16 think it is best that the supervisor
17 interview their own subordinates in terms
18 of that subordinates might not be as
19 forthcoming, and they might not be -- if
20 you are not trained, you may be tipping
21 what you want them to say.

22 But at any rate she did do that.
23 She called me up. I immediately went to
24 her office, and she relayed to me what she
25 discovered. She had interviewed actually

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a couple of people, more than one, and I heard what she had to say, and then I conducted my own investigation.

Q. When you were conducting your own investigation, did you do that investigation with anyone else?

A. A couple of the -- one -- at least one of the interviews that -- there were other people present. Anucha was present, and I believe Karen Buchholz was present, but they weren't -- they weren't -- they weren't conducting the investigation at that point.

Q. Is there a woman by the name of Anne Jackson on your staff?

A. Yes.

Q. Was she involved in the investigation at all?

A. She was involved in a piece of it, yes.

Q. What piece was she involved in?

A. I believe she interviewed one or two of the individuals -- actually on a couple of the interviews she -- that I did

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she sat in with me, and then I believe she conducted one interview on her own of an employee.

Q. You referred in your earlier answer to Ms. Browne-Sanders having what you say conducted her own investigation about what -- Mr. Gonsalves' conduct?

A. Yes.

Q. And you said that she had you believe interviewed two people?

A. Yes.

Q. Who did she interview?

A. [REDACTED] and [REDACTED].

Q. Both of those individuals reported to Ms. Browne-Sanders indirectly?

A. Indirectly, yes.

Q. Are you aware whether Ms. Browne-Sanders discussed the issue of Mr. Gonsalves' conduct with Steve Mills before calling you about it?

A. It's my understanding that she did call him first, and I believe she sent us both an E mail around that same time,

1 MORAN

2 either that day or the next day outlining
3 some of her findings.

4 Q. Did you talk to Mr. Mills about
5 it -- the allegations against Mr.
6 Gonsalves at all?

7 A. I'm -- I'm not sure that I did.
8 I'm not sure that I did.

9 Q. At any point?

10 A. I don't believe so. I don't
11 recall.

12 Q. We started this line of
13 questioning because I had asked you
14 whether or not there were any instances in
15 in which you conducted an investigation
16 but didn't speak to the person who was
17 accused of wrongdoing.

18 A. Yes.

19 Q. And I take it you didn't speak
20 to Mr. Gonsalves about the allegations
21 against him?

22 A. No, I didn't.

23 Q. Why not?

24 A. There -- there are very few
25 cases, and this was one of them,

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A. I was told -- well, I asked [REDACTED] directly. Actually when I was interviewing her, Rochelle Noel was with me, and I believe it was Rochelle who asked her directly did you get into the van voluntarily, and she said yes, and did you -- was he -- did he force you to do anything. She said no, and it was actually asked -- I think I asked her are you saying it was consensual, and she said yes.

Q. Did you have any discussions about that allegation with anyone else other than Ms. [REDACTED]?

A. Well, when we interviewed [REDACTED] [REDACTED], we asked them to take us through the evening, and the last they remember -- I don't -- I don't believe they are aware of -- of what happened with [REDACTED] and Stephon Marbury because she left with Hassan, and they went home, and they might know because maybe -- when I did the investigation I -- I felt fairly certain that they did

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

A. Correct. She -- my -- my notes reflect that she said Karen -- Karen felt that -- her opinion was that [REDACTED] was not real convincing.

Q. And Ms. [REDACTED] also told you that that Mrs. --

MR. MINTZER: Strike that.

Q. Ms. Buchholz also told you that Ms. [REDACTED] had said to her that she felt like she had to do it?

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

A. Yes, she said that -- she related to me that [REDACTED] said to her that she felt like she had to do it, which I'm not sure it is totally consistent with what [REDACTED] told me when I interviewed her.

Q. Just to take a step back, when you take notes of conversations such as this do you make an attempt to write down everything that you regard as relevant to

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You may answer.

A. Nothing -- nothing comes to mind at the moment.

Q. Did you learn that in the course of that investigation that Mr. Marbury had made inappropriate comments about Ms. Browne-Sanders?

A. I -- I did learn that Mr. Marbury called a gentleman named Dan Gladstone and made comments -- according to Mr. Gladstone he said that Stephon called him, and they -- made comments towards Anucha.

Q. How did you learn that?

A. From Mr. -- from Mr. Gladstone.

Q. Were you speaking with Mr. Gladstone in the context of your investigation of Mr. Gonsalves?

A. I believe so, yes.

Q. Mr. Gladstone relayed to you what the comments were that Mr. Marbury made about Ms. Browne-Sanders?

A. Yeah. Just the -- back up. I think the context came not so much

MORAN

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2 in -- in the investigation of Mr.
3 Gonsalves, but -- and I'm not clear on the
4 context, but Anucha had asked him to put
5 in writing a conversation that took place
6 maybe a year earlier, and I'm not sure
7 that it -- I'm not sure that it had any
8 relationship at all to the investigation.
9 It was something that -- for whatever
10 reasons I'm not sure, but Anucha said to
11 him she -- we -- we had a conversation.
12 You told me about a year ago, what --
13 whatever the time frame was, that Stephon
14 had called you and made remarks about me.
15 Can you now put that in writing for me,
16 and he did I guess. He -- I know he did,
17 and I don't -- I don't think it had
18 anything to do with the Gonsalves
19 investigation. I mean it might have come
20 up during that time frame, but it wasn't
21 directly related to my investigation.

22 Q. Does Mr. Gonsalves have any
23 relation to Mr. Marbury?

24 A. He is referred to as his cousin,
25 but I don't know that to be accurate.

1 MORAN

2 that clear and that definitive, you know,
3 where a resource were available. They
4 know we are available to help. You know,
5 as long as, you know -- as long as we are
6 involved in the termination, then -- then
7 I think that would satisfy the policy or
8 the practice. Not the policy.

9 Q. Did you make a recommendation to
10 anyone that Mr. Manuel should be
11 dismissed?

12 A. I don't know that I made a
13 recommendation. I -- well, at -- let me
14 think about that. Actually I believe I
15 did. I told -- told Rusty McCormack that
16 we were going to terminate -- we wanted to
17 terminate him.

18 Q. What did Mr. McCormack say?

19 A. He said -- he said fine. I gave
20 him the facts, and he -- he concurred that
21 that was appropriate.

22 Q. Do you know whether Mr.
23 McCormack spoke with anyone before
24 agreeing with your recommendation to
25 dismiss Mr. Manuel?

1 MORAN

2 A. Not that I am aware of.

3 Q. What about with respect to Mr.
4 Hassan, did you make a recommendation that
5 Mr. Hassan be dismissed?

6 A. Yes.

7 Q. To whom did you make that
8 recommendation?

9 A. Well, again, you know -- well
10 Anucha already wanted him dismissed, so
11 that wasn't -- that wasn't an issue. I --
12 again I would have told Mr. McCormack and
13 someone at -- I don't know whether it was
14 me. Someone informed Steve Mills. I
15 don't recall who, and he -- he also
16 concurred.

17 Q. You didn't speak to Mr. Mills
18 directly about Mr. Hassan -- Mr.
19 Gonsalves' situation?

20 A. I'm not really sure.

21 Q. Did you speak to Mr. Mills
22 directly about Mr. Manuel's situation?

23 A. Again, I'm not -- I'm not sure.

24 MR. MINTZER: This might be a
25 convenient point to take lunch.

MORAN

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2 off -- Mark Piazza occasionally would say
3 something like, you know, I would say how
4 are things going, and he would make some
5 kind of offhand remark, well, not so good.
6 These are usually when we were leaving the
7 staff meeting, and he would say things
8 like she doesn't know what she is doing
9 and things like that, and I didn't choose
10 to pursue it.

11 Q. Anyone else that you recall
12 other than Mr. Piazza making an offhand
13 comment like that?

14 A. Frank Murphy. I know Tim
15 Hassett, the president of facilities, was
16 frustrated with with her. There was an
17 incident where they were having an open
18 practice, and he -- Anucha didn't -- so I
19 am told -- Anucha didn't inform anyone
20 over in facilities that they were having
21 an open practice, and it was publicized
22 and marketed, and I guess a hoard of
23 people showed up, and he -- he said it was
24 lucky no one got killed, and he was very
25 angry about it, that she hadn't informed

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him.

Q. Who --

A. So he -- he expressed his frustration to me about that, and then there was another situation where he was frustrated. They created some new positions that were like fan service reps, and they -- and Anucha had -- had them wear orange T-shirts just to distinguish them, and she put Faye Brown, her assistant -- we referred to them as coordinators at The Garden -- in charge of the project, and they were lot of people who raised their eyebrows. Well, they liked Faye. They thought that she really wasn't qualified to, you know, manage that significant task, but what really had them frustrated was that again they weren't told about it, and it became a serious problem because the ushers, who are unionized, were like when these people showed up said, well, who are these people. They are doing what we do, and it became a -- it became a -- it became a

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Q. Are you aware of Ms. Browne-Sanders getting additional responsibilities at any other time after her promotion?

A. No, I'm not aware of any more.

Q. You said with respect to the fan reps that there was, I think you referred to the situation as chaotic?

A. Um hum.

Q. Did you witness anything yourself about it being chaotic; were you present at the -- in the arena?

A. I was actually. I don't know that -- I don't know if it was the -- what night it was, but I know when I walked in I -- I had heard that -- that we were getting fan reps, and there were a lot of people milling around, and some of them were greeting people, but when -- people were asking them where to go, the -- they didn't -- the ones that I observed weren't familiar with The Garden, and somebody would say, well, I need to go to seat whatever, you know, section 67 B or, I

1 MORAN

2 don't know, and unfortunately the people I
3 observed had no clue where to tell them to
4 go, and it was sort of like -- I remember
5 saying to myself, well, you know, this
6 seems sort of -- this just seems
7 counterproductive, and so they -- they had
8 to go to an usher, you know, who did know
9 where to go, and it just seemed like an
10 unnecessary step that could annoy the
11 fans.

12 Q. Any other basis for your
13 statement that it was a chaotic situation?

14 A. Yeah. Well -- well, what
15 happened since they had these orange
16 shirts on everybody sort of -- everyone
17 gravitated to them. So -- Usually when
18 there is a come in people come in and they
19 get diffused out through the -- I don't
20 know if you have ever been over there --
21 in the ticket area, ticket window, and
22 they just sort -- actually it goes pretty
23 smoothly, but actually they were wearing
24 these orange shirts. People were -- they
25 were congregating around these

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individuals, and it was clogging -- they were right by the entrance, and they were clogging things up.

Q. People wearing orange shirts are not an unusual sight at a Knick game?

A. Well, as people walked in, they greeted them. They were trying to be upbeat and enthusiastic, and so the people were -- you know, as a result of that people were going to them, and it was -- and it was confusing.

Q. Any of the situations that you've described concerning what other people relayed to you about difficulties with Ms. Browne-Sanders, did you communicate any of those issues with Ms. Browne-Sanders management?

A. No, I didn't.

MS. HORWITZ: Kevin, are you going to move into another -- I just need a bathroom break.

MR. MINTZER: Sure.

MS. HORWITZ: I didn't want to interrupt.

1 MORAN

2 MR. GREEN: Objection.

3 Objection to form. Misstates prior
4 testimony.

5 A. Yeah. I -- I -- yes, I think I
6 did, but I'm -- I'm not really -- I'm not
7 sure of the timing. I mean I know she got
8 new responsibilities. I am not -- I'm not
9 sure about the timing. I know that she
10 got an increase over and above these four
11 to five range. I don't know the timing of
12 it, but I know she did get it.

13 Q. What additional responsibilities
14 is it your understanding that she
15 undertook to -- in connection with this
16 increased salary?

17 A. I'm not sure.

18 Q. And when did you learn of this?

19 A. Of her increased
20 responsibilities?

21 Q. Yeah.

22 A. I'm sorry. I'm not sure.

23 Q. You became aware at some point
24 that Ms. Browne-Sanders had made a
25 complaint of sexual harassment?

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A. Yes.

Q. How did you become aware of that?

A. Mark Schoenfeld asked me to -- he called and asked me with some others to -- he was out of the office, and I think they had just met with plaintiff's counsel, perhaps you, and he wanted to inform us as to what Anucha's allegations were.

Q. Who was present for that conversation? You said Mr. Schoenfeld was calling from out of the office?

A. Yes.

Q. And were you with other people in the office?

A. Yes.

Q. Who -- who was there?

A. I was there, Steve Mills I believe was there. I think Barry Watkins. I don't know whether Rusty was there or not.

Q. Did you have any conversations with Mr. Mills or Mr. Watkins after the

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call with Mr. Schoenfeld?

A. Not that I recall. I think I just got up and left and went back to my office.

Q. Did Mr. Schoenfeld give you any direction to investigate the matter?

A. Yes, he did.

Q. What did he say about that?

A. Well, he said that -- that when he got back -- I'm not sure if it was that day or whenever he came back -- that we should meet because he wanted me to -- to conduct an investigation, and I -- I think -- I think -- I'm not sure, but I think Rochelle Noel might have been on the conference call in a different location, and so he just said we need to talk. We need to do -- you know, it looks like we should do an immediate investigation.

Q. Mr. Schoenfeld described what the allegations were as he understood it to everyone who was participating in the call?

A. Yes.

MORAN

1 while I am here in Orlando, and I said
2 well, you know, you should -- I am just
3 going under what I was told that you
4 shouldn't come back until the
5 investigation is complete. So she said,
6 well, what am I going to tell my people,
7 and I said, well, I don't know. So she
8 started, well, maybe I will tell them that
9 I am going to extend my vacation for
10 another week, and I said, well, it wasn't
11 for me to -- I said okay, if that is what
12 you want to do, and I think that is what
13 she did. I think she sent an E mail to
14 them saying I am extending my vacation
15 another week.

17 Q. Did you ever communicate to
18 Ms. Browne-Sanders that she couldn't come
19 to the office because of security
20 concerns?

21 A. There is a letter that was
22 written to her that made reference to that
23 I recall, that she -- she had expressed
24 security concerns to us and to me. In
25 fact, we offered -- we offered if -- we

MORAN

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2 said if you feel that way, we offered to
3 give her a security, and in fact when she
4 was going to the games -- this was during
5 the period -- this was around the period
6 when Hassan was being terminated, and she
7 made some -- she made some comments to me
8 about concern for her safety. I -- we
9 were in her office, and she was very upset
10 and was making statements about Stephon
11 and Isiah and said she was concerned about
12 her security. And I sell, well, if you
13 are really concerned about security we --
14 maybe we could do something about that.
15 So we had Joe Dean, who was
16 internal -- one the internal security
17 people, we called him and arranged for --
18 she said I have to walk to my car by
19 myself. So we arranged for her to be
20 escorted to her car. We had security
21 around where she -- where she was
22 sitting because she seemed -- she seemed
23 nervous about Hassan. So they
24 gave -- they gave Hassan's picture to the
25 security people, and they said don't let

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1 MORAN

2 this guy in the area, and so she was going
3 on about that.

4 The reason I remember it so
5 vividly is -- it's always bothered me --
6 is that she was quite upset and agitated,
7 and she was saying, you know, Stephon
8 doesn't like me, and, you know, I
9 didn't -- I didn't credential him way back
10 when, and -- and she was saying things
11 about Isiah doesn't like me, and I always
12 find that curious that, you know, here I
13 am ER. I work with her on all these
14 things, sexual harassment things, and she
15 never once said to me and by the way Isiah
16 Thomas is sexually harassing me. I mean
17 she had all these other -- she had -- was
18 throwing out all these other things. I
19 just -- I never -- I've never been able to
20 understand it. I find it disturbing
21 because why wouldn't she make -- make
22 those allegations to me at the time.

23 MR. MINTZER: Could you read
24 back my question.

25 (Record read.)

MORAN

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2 refresh your recollection that you
3 instructed Ms. Browne-Sanders that she
4 should not come to the office before you
5 had your interview with her?

6 A. Yes, it does.

7 Q. Okay.

8 A. Yes.

9 Q. And -- first of all, is this a
10 letter that you signed?

11 A. Yes.

12 Q. And did you write this letter?

13 A. No.

14 Q. Did Mr. Schoenfeld write this
15 letter?

16 A. I'm not sure who wrote the
17 letter.

18 Q. How did it come to your -- your
19 attention?

20 A. It would have been through one
21 of our counsel.

22 Q. So one of your counsel presented
23 you this letter and asked you to sign it?

24 MR. GREEN: Objection to form.

25 A. Well, they -- they asked me to

1 MORAN

2 read it, and -- and then it -- was it
3 consistent with my understanding, and I
4 wanted to make sure I understood it, and,
5 yeah, I mean I signed it.

6 Q. Okay. Did you make any changes
7 to it before you signed it?

8 A. I don't believe so.

9 Q. The -- in the third paragraph
10 where the letter refers to what
11 we "-- what you have expressed as your
12 concerns about your personal physical
13 safety" --

14 A. Um hum.

15 Q. -- what were you referring to
16 there?

17 A. I am sorry. Where is it?

18 Q. In the third paragraph. You
19 refer to "including particularly what you
20 have expressed as your concerns about your
21 personal physical safety," do you see
22 that? It is in the third and fourth line
23 in the third paragraph.

24 A. Um hum.

25 (Pause.)

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A. Well, again she was -- I don't know. She was making -- she was making statements, and I don't know how often, but she had been -- I know at least on that one occasion about her security and that she was afraid of -- well, concerned about her security.

Q. The statement to you that she made that was approximately a month before you sent this letter, right?

A. Yes.

Q. And she came to work for several weeks after she first made that statement to you, correct?

A. That's correct.

Q. And so your instruction to her not to come to work because of concerns about her personal safety only was made after you were aware that her counsel had complained about discrimination and harassment?

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

A. I'm sorry. Do that again for

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me?

Q. Your instruction to Ms. Browne-Sanders not to come to the office out of concerns for her personal safety --

A. Um hum.

Q. -- you only made --

MR. MINTZER: Strike that.

Q. You only gave Ms. Brown-Sanders the instruction not to come to work after her counsel complained about discrimination on her behalf?

MR. GREEN: Objection.

Q. Is that true?

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

A. Well, it might have been after, but I don't -- I didn't see any connection at the time.

Q. Whose decision was it for Ms. Browne-Sanders not to come back into the office?

A. I -- I don't know.

Q. Who informed you of that?

1 MORAN

2 or the next day after a game, and so
3 the -- there was a problem.

4 Q. Okay. But was there also a
5 problem about Mr. Thomas' availability
6 that Mr. Mills was discussing?

7 A. Yeah. Anucha did complain that
8 he wasn't available enough.

9 Q. And Mr. Mills said that he told
10 Mr. Thomas he needed to be more available?

11 A. Yes.

12 Q. Okay. Could you go to the next
13 page please, 4182.

14 A. Okay.

15 Q. Under the -- there is a note
16 12/4 -- 12/14 I think it says.

17 A. Yeah.

18 Q. Could you read that -- that
19 section, please?

20 A. "Hug Anucha E mail. See E mail.
21 Steve spoke to Isiah about E mail. What
22 are you talking about? Did give me a hug.
23 She looked at me with daggers like she
24 wanted to kill me. Steve said don't do it
25 again, hug her, touch her. Isiah said it

MORAN

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2 was purely friendly. Steve didn't respond
3 to Anucha's E mail. He saw Anucha in the
4 suite at -- at jingle ball, that she was
5 with kids, so -- but with kids." I am not
6 sure who was with kids. "So I didn't say
7 anything. Had meeting scheduled for next
8 Tuesday, but she cancelled.
9 12" -- whatever next Tuesday was.

10 Q. Um hum.

11 A. Either Monday or Tuesday.

12 Q. Did Mr. Mills say why he didn't
13 respond to Ms. Browne-Sanders' E mail?

14 A. No, he didn't. And I think this
15 was the -- this -- this was the incident
16 that I believe at gate one and -- where
17 Isiah -- he told Steve he was sort of like
18 shocked. He said he had on other
19 occasions approached Anucha and in a
20 greeting gave her a hug, and there was
21 never a problem, and at this time for some
22 reason he was -- she pulled back, and he
23 was surprised. He didn't understand. It
24 was a different reaction than he had
25 received in the past.

MORAN

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Q. My question was did -- did Mr. Mills say why he --

MR. MINTZER: Strike that.

Q. Did Mr. Mills say whether or not he responded to the E mail that Ms. Browne-Sanders sent?

A. No, he didn't.

Q. And did you ask him why he didn't respond?

A. No, I didn't.

Q. Can I ask you to look at the next page, 4183.

A. Okay.

Q. Towards the bottom of the paragraph it seems to start with "Didn't complain to Steve about how Frank spoke to her." Do you see that?

A. Yeah. Let me just read the full paragraph.

Q. Um hum.

(Pause.)

A. Do you want me to read that?

Q. Yes, just starting with "didn't."

JOHN D. MORAN
Vice President, Employee
and Labor Relations



Confidential / Addressee's Eyes Only

BY EXPRESS DELIVERY

December 30, 2005

Ms. Anucha Browne-Sanders
201 White Oak Ridge Road
Short Hills, New Jersey 07078

Dear Anucha:

Last week, we were advised through your lawyers of alleged conduct towards you. As you know, we are investigating what your lawyers told us. Through our counsel to yours, we requested last week as part of our investigation the opportunity to speak with you directly, with your counsel present if you preferred.

We understand that yesterday, through your counsel, you suggested that we speak to a number of other individuals in our investigation. You nevertheless declined our request to speak to you directly. We remind you that, as an employee and officer of The Garden, you have an obligation to cooperate with The Garden in its investigation of the alleged conduct. We urge you to reconsider what we understand to be your decision not to speak to us.

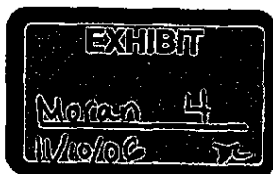
In the meantime, we will continue our investigation despite the handicap of not being able to speak with you, directly and in detail, about your allegations. In addition, given what we understand your allegations to be, including particularly what you have expressed as your concerns about your personal physical safety, we do not wish to put you in a position where you believe your safety and security may be at risk until we have had an opportunity to complete our investigation and undertake whatever remedial steps may be appropriate. Accordingly, until our investigation is concluded, you will remain on the paid vacation status you commenced on December 23. Please contact me on Tuesday morning via telephone to discuss coverage of your duties and functions while you are out of the office.

Very truly yours,

John Moran
VP Employee & Labor Relations

Cc: Judith Vladdock / Kevin Mintzer (by hand)

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New York, NY 10121-0091
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MSG 04230

Prep Sheet
Steve Mills
(Follow-up)

- 11/28 - ELLI ASK PETER TO TALK TO ANUCHA CONCERNING
ESIAH AND HIS TREATMENT OF WOMEN
- 11/28 - NOV 28/29 / ANUCHA CAME TO YOU TO DISCUSS
DETAILS OF STERBONS TIRADE & SAID
A- "I CAN'T DO THIS ANYMORE" <sup>WHAT DO YOU
WANT ME TO DO
ABOUT THIS?</sup> / STERBON SAID "ESIAH IS GOING TO SAY YOU
ARE HANDLING AN AFFAIR W/ ITT JOFF-LIX"
/ DO I WANT TO GET AN ATTORNEY?
- DID SHE EVER COMPLAIN TO YOU AT ANYONE ABOUT
HIS CONDUCT?
- 3/23 - FRANK MURPHY - TOLD ANUCHA NOT TO SEND
NOTES LIKE THAT ← EMAIL TO FRANK
- [3/10 INCIDENT / PULLED INTO ROOM
3/11 / TOLD STEVE A 3PM WEEKLY MEETING
3/23 MEETING / AT BOTTOM OF MEETING BROUGHT UP
CURSEW/ AT THE "AND" AFTER ESIAH LEFT
PATRA POPP - YOU CALLED ESIAH?
12/20/04 / HUBBARD FINALLY / ^{W/ WORK} "LOVE YOU" / BUNSON DR. THASOM
/ TOLD STEVE & SAID HE NEEDED SECURE H. THASOM.
- DR. KING
12/14 / WAST INCIDENT
WHEN WAS YOUR LAST CONTACT W/ BUNSON WITH ANUCHA?
- CHASME BELIEVES



State mills Fall 0, 3:30

2ND INTERVIEW

1st Point / OLSON TALK /
out my perspective

OLSON / SPOKE ABOUT ISIAH

/ He was managed a staff like he has
now.

/ DALLAS PLANNED TO MANAGE HIS PEOPLE
/ WORK TO MANAGE BETTER

/ WAS GOING TO HAVE FRANK RUN MOST
OF THE OPS & I DIDN'T THINK THAT WAS
A GOOD IDEA

/ FRANK OLD SIBBE & ISIAH NEEDED TO
BE MORE INVOLVED

- ASK PETER ^{TO} SPEAK TO ARTICLES ABOUT THE MATTER,
DON'T REMEMBER OTHER THAT

- ISIAH WANT FRANK TO BE POINT PERSON
WITH ARTICLES - STRE OF WITH THIS
TOO MUCH DETAIL

- ANITA COM PLAINED ON NUMEROUS OCCASIONS
ABOUT ISIAH'S CONDUCT

- ABSOLUTELY HOT

- KNEW THERE WERE ARGUMENTS, BUT

- NO ONE EVER TOLD ME HE WAS CALLED
PEOPLE BITCHES & WHORES

2

Nov. 28 / said "I can't do this anymore"
"I can't win bring up Nix" — No
space / got copy of email from Dan & from
ANITA ABOUT SEPTON

Friday
before?

came to my office WEDNESDAY OF
SERVING H. CHARLES BY HASSAD.
? / ANITA BROUGHT UP VERONICA & SAID
COME BACK MONDAY IF YOU CAN'T
TALK IT ANYMORE —

MONDAY AM / 1ST HEARD ABOUT
SERVING H CHARLES
CALLED SUN NIGHT TO MEET MONDAY

IN TEARS, EXPLOSIVE SITUATION IN KICKS
KATHERINE HAD MORE INFO

- I KNOW HOW SEPTON FEELS ABOUT ME
- I CAN'T DO THIS ANY MORE
- I " WORK HERE ANYMORE ..
- JUST FIND ME A JOB WHILE I AM HERE

ANITA TO THE VERONICA SAID ANITA WAS OUT TO
LET HIM STAY THEY WOULDN'T LET HIM GO
TO A BRINE — TALK AT KICKS

- ALL TRANS / JUST SAID OK, IT'S A
 HARD JOB / WE WILL FIGURE OUT A
 WAY TO DO THIS
 - WHY WOULD I SAY DSIH HAS THIS
 OVER TV

NIX - DISCUSSED 2 TIMES OVER LAST
 2 YEARS }
 - PETER FICHLER HAD SAID SOMETHING
 ABOUT A AND NIX
 - I DIDN'T PUT ANY CREDENCE IN IT.
 2ND MAY HAVE BEEN OR HAD CONVERSATION
 MORE THAN ONCE

- DO I NEED A LAWYER? - REMEMBER IN
 CONVERSATION, AFTER ALL OF THE EMPLOYERS &
 STEPHEN SHE ASKED ME WHAT WOULD BE
 NEXT STEPS - JOHN MORRIS WOULD DO
 AN INVESTIGATION OF EVERYTHING
 - AM I VIKING INVESTIGATION? DO I NEED
 AN EMPLOYER TRUST COUNCIL? I SAID NO!
 - SEEKING CONSULTATION FROM THE ONE OR
 MONOPY OUTLINED ABOVE

3/23 / Email concerning FRANK - DON'T
SEND THESE NOTES - DON'T REPLY BY EMAIL

3/23 - Remember the meeting & points of
RESPONSIBILITIES

- Remember SHE & FRANK HAD TO
ALL ARGUMENT

DON'T RECALL MEETING ABOUT
RESPONSIBILITIES TO BE TRIGGERED
BY FRANK ARGUMENT
REMEMBER DISCUSSED OVER RETIREMENT
AREA & SHE WANTED TO MAKE SURE
IS NOT UNDERSTOOD HER MEANS & WE
HAD MEETING TO DISCUSS THAT

- AT CONCLUSION HE WAS TOLD HE/IS/HE
JUST HAD PROBLEMS

- AFTER MEETING, TOLD ANTONIA SHE WAS
POSSIBLE TO HAVE

- DON'T RECALL ANY BITCH/HO/ ETC
(IS IT IN HEARING OF THIS) AT MEETING

3/10 Pulled into room / CURSED AT HER / DON'T
OF THIS

3/11 BRADY TO BRADY TOLD HER

I KNOW HE TO ST & EARLY BOYS INTO LOCK ROOM

BUT HE WENT IN & TOLD BY ANTONIA THAT

HE SAID NO MORE APPEARANCES

TOLD IS THAT HE SHOULD NOT OF SAID THAT

SINCE THEY DO HAVE TO DO APPEARANCES

6

Peter Pope / has spoke to Esina

seen Esina greet her & kiss on cheek
Anita complains about too long hug, etc
see 10

12/20/01 ~~Esina~~ tell of incident?
No, you kidding me. Didn't tell
~~me~~ me of any of them

[redacted] / relationship with Esina? No
/ concerned about a sexual ~~harassment~~? -
don't know of any I know
/ never said anything negative
about people on Esina

Charles Vernon P. Ratt / yes, Es.
this was really that much of a
problem / not sure if I was ^{there} from
Sun, but if I don't feel strongly
about this I consider
/ Jim says to take Vernon on as a
project

even suggest Esina take should take
sexual h training? No

2

How He INTERACTS in an OFFICE

GET MAIL

DEVELOP TRAFFIC & PROX FOR HIM

WITH PETE

- NO ONE EVER CAME TO ME SAYING HE

IS SEXUALLY HARASSING PEOPLE

- NOT SHOCK ME IF HE WALKED SOMEWHERE

OUT