

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

06 CV 0589 (GEL)

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

Defendants.
-----X

VIDEOTAPED DEPOSITION OF ANUCHA BROWNE SANDERS

New York, New York

Monday, November 27, 2006

REPORTED BY:

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Job Number: 10954



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2 to Isiah.

3 Q What did he say they were?

4 A Exactly what I said. I was
5 P&L manager responsible for the business
6 operations, the business side of the team,
7 the revenue streams, marketing, new media,
8 Web, game presentation, community
9 relations, alumni relations. We went
10 through fan development and all the rest
11 of my responsibilities. And he confirmed
12 that that was my role.

13 Q How about budgets, was that
14 your responsibility?

15 A Yeah. It was a collaborative
16 responsibility, yes.

17 Q Collaborative with who?

18 MS. VLADECK: Objection to
19 form.

20 A Well, as P&L manager, there
21 were parts of the P&L that I was
22 responsible for that were directly
23 influenced by my peers. So there were
24 other people in the senior vice president
25 role that influenced and also had direct

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2 responsibility for parts of the P&L.

3 Q But the ultimate
4 responsibility for P&L and the budgeting
5 at the Garden, as related to the Knicks,
6 was yours, correct?

7 MS. VLADECK: Objection to
8 form.

9 A I would consider myself a P&L
10 manager, and in that role, I had people
11 providing me information.

12 The ultimate ownership of the
13 P&L --

14 Q Sorry. I was rude, but I did
15 not mean to be rude. Would you mind
16 saying it again.

17 A In my role, I was the P&L
18 manager. So I owned the revenue streams.
19 The budget process was a collaborative
20 process, and it involved myself, it
21 involved Mark Piazza who oversaw P&L for a
22 number of different entities, as well as
23 Brian LaFemina who oversaw suites and
24 tickets and some of the ticket sales
25 responsibilities.

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2 Q You can't say specifically
3 what they were.

4 But anything else?

5 A He's damaged my reputation.

6 Q In any other way other than by
7 the ways you just described?

8 A I think he's affected my
9 ability to get other employment.

10 Q Have you tried to get other
11 employment since you left the Garden?

12 A Yes, I have.

13 Q With whom have you tried?

14 A Quite a number of people.

15 Q If I leave a space, will you
16 tell me who those people were?

17 A Georgetown University,
18 Gatorade, Verizon Wireless, TENNIS
19 Magazine.

20 Q What magazine?

21 A TENNIS.

22 Q Tents?

23 MS. VLADECK: TENNIS.

24 MR. PARCHER: TENNIS Magazine.

25 A TENNIS Magazine.

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2 Q Are you a tennis player?

3 Sorry. I withdraw that
4 question. I've only got a few more
5 minutes.

6 A Northwestern University.
7 Rutgers University.

8 Q Only because of the pressure
9 of time, if you have more, you can fill it
10 in at the time you see your depo. You'll
11 have a chance to put in more after you
12 reflect on it.

13 But are you saying that these
14 are companies or institutions that you
15 applied a job for, they turned you down
16 because your reputation has been damaged;
17 is that your position?

18 MS. VLADECK: Objection to
19 form?

20 A Yes, I would agree. Yes.

21 Q Did anybody say that to you?
22 At any of the institutions or companies
23 that you applied to, up to this moment in
24 time, has anybody said to you something
25 about your reputation has been damaged and

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2 therefore they are not hiring you?

3 MS. VLADECK: Objection to
4 form.

5 A No. Not that I can recall,
6 no.

7 Q So what's the basis of your
8 saying that it's because your reputation
9 was damaged?

10 A I interpret a lot of the
11 rejection and certain places I've applied
12 for jobs is not wanting to be associated
13 with somebody involved in something of
14 this magnitude.

15 Q Has anybody told you that?

16 A Not in those direct words.

17 Q Did they tell it to you
18 indirectly?

19 A I've had executive recruiters
20 reference the case and the difficulty --
21 or the importance of being able to present
22 to their clients, who were firms that are
23 hiring, risk assessment, media assessment
24 of all their clients that they are
25 presenting.

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2 I think it's left questions
3 for people, given the Garden's statement
4 on the reasons I was fired.

5 Q Anything Isiah did that caused
6 your reputation to be hurt?

7 MS. VLADECK: Asked and
8 answered. Objection to form.

9 A Isiah was part of the decision
10 in firing me.

11 Q And if he wasn't part of the
12 decision to fire you, was there anything
13 that he did to cause your reputation to be
14 hurt?

15 MS. VLADECK: Objection to
16 form. Asked and answered.

17 A I think he contributed to all
18 of those things, yes.

19 Q By the ways you told us,
20 Marbury and so on and so forth, all of
21 those points; is that what you are saying?

22 A Yes.

23 Q Has anybody told you that you
24 have a lesser reputation today than you
25 did when you were working at the Garden?

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2 A Not in those words, but it's
3 clearly been implied in my discussions
4 with some executive recruiters.

5 Q What are their names?

6 A I've spoken to Buffy Fillippo.

7 Q Would you give me an address
8 if I left a space?

9 MR. MINTZER: I think you've
10 been provided with Interrogatory
11 answers, and you have it already.

12 MR. PARCHER: I have it
13 already. Thank you.

14 Q No offense -- and I hope it
15 doesn't happen -- but if you won your
16 lawsuit, that would clear up your
17 reputation in regard to what kind of
18 person you are?

19 MS. VLADECK: Objection to
20 form.

21 A I don't know.

22 Q Really? Walk out of that
23 courthouse smiling and laughing on your
24 way down to Chinatown or Little Italy to
25 celebrate, you don't think that cures any