

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

Tuesday, November 28, 2006

REPORTED BY:

BARBARA R. ZELTMAN

JOB NO.: 10957



David Feldman
Worldwide

From the Trial

805 Third Avenue, 8th Floor
New York, NY 10022
(800) 642-1099

600 Anton Boulevard, 11th Floor
Costa Mesa, CA 92626
(866) DFW-1380

1 ANUCHA BROWNE SANDERS

2 A People left the Garden.

3 People came in, yes.

4 Q Did people leave voluntarily
5 or involuntarily or was it a combination
6 of the two?

7 MS. VLADECK: Objection to
8 form.

9 A Most people left voluntarily.
10 Outside of the layoffs some people left --

11 Q Did any --

12 MS. VLADECK: Sorry. Were you
13 finished?

14 A Most people left voluntarily.
15 Some people were laid off and then I think
16 there were a few that were fired.

17 Q Did Eddie Oliva leave?

18 A Yes.

19 Q And can you tell us what his
20 position was and when he left?

21 A I think he was a director
22 level basketball operations/community
23 relations.

24 Q Forgive me, but how does
25 director level fit in the organizational

1 ANUCHA BROWNE SANDERS

2 structure with respect to vice presidents
3 and senior vice presidents?

4 A Starting from senior vice
5 president being the highest ranking, the
6 vice president is below that, director is
7 below that, manager and then assistant.

8 Q Thank you.

9 So who did Mr. Eddie Oliva
10 report to when he was a director and left?

11 A He reported directly to me.

12 Q And you would have been vice
13 president?

14 A Was I vice president? I don't
15 know if I was vice president or senior
16 vice president at that point. I'm not
17 sure of the exact --

18 Q Wouldn't a director -- I'm
19 sorry.

20 Wouldn't a director report to
21 a vice president and vice president report
22 to a senior vice president?

23 A No, not necessarily. I had
24 directors reporting directly to me.

25 Q When did Mr. Oliva leave, do

1 ANUCHA BROWNE SANDERS

2 directly into basketball operations and
3 not community relations or marketing.

4 Q And why was that a problem?

5 MS. VLADECK: Objection to
6 form.

7 A Because that wasn't his
8 assigned position. His assigned position,
9 as stated by Steve Mills, was that he
10 would be working in my department within
11 community relations.

12 Q Do you know if a reason for
13 his wanting to report in to basketball
14 operations was because he didn't want to
15 report to you?

16 A No. His reasons for wanting
17 to report in to basketball operations was
18 because he felt that the majority of his
19 function is -- his job function was
20 basketball-operations focused.

21 Q And did Peter Fagan also
22 leave?

23 A Yes, he did.

24 Q Can you tell us what his title
25 was and what his job was and when he left?

1 ANUCHA BROWNE SANDERS

2 and took me aside and said, "I want to
3 talk to you about [REDACTED]"

4 He proceeded to tell me that
5 he mentioned to [REDACTED] that they had money
6 set aside to hire somebody in a consulting
7 role to help them with the [REDACTED]

8 [REDACTED] He said
9 that [REDACTED] then said that she wanted to do
10 that. And he asked her, "Well, you are
11 doing that -- you're working for the
12 company, how can you work for the company
13 and also do this program for me on a
14 consulting basis?"

15 And she said, "I've done it on
16 other programs." That was relayed to me.
17 I came back and I relayed that to Steve
18 and he asked me to -- I don't remember who
19 at the time I spoke to in HR, who he
20 directed me to. And she was fired.

21 Q Did Mr. Mills offer any
22 resistance to her being terminated?

23 MS. VLADECK: Objection to
24 form.

25 A [REDACTED] had numerous performance