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

-----x
ANUCHA BROWNE-SANDERS,
Plaintiff,

- against -

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

-----x
December 8, 2006
12:24 p.m.

VIDEOTAPE DEPOSITION of ISIAH
LORD THOMAS, III, taken by the Plaintiff,
pursuant to Notice, held at the offices of
Vladeck Waldman Elias & Engelhard, P.C,
1501 Broadway, New York, New York, before
Debbie Zaromatidis, a Shorthand Reporter
and Notary Public of the State of New
York.

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ubartman

THOMAS

1
2 any conversations with Barry Watkins
3 regarding this litigation?

4 A. You skipped a name.

5 Q. Have you talked to yourself?

6 A. Every night.

7 (Laughter.)

8 Q. What do you say every night?

9 A. Yes, I do.

10 MR. GREEN: This question also
11 requires you to answer except to the
12 extent that the information would reveal
13 conversations held with or in the presence
14 of counsel.

15 Q. Barry Watkins.

16 A. No.

17 Q. And then Jerome Williams --

18 MR. GREEN: Same admonition.

19 A. No.

20 Q. Mr. Thomas, you said that
21 Ms. Burnett is your -- you're her uncle?

22 A. Yes.

23 Q. Did you get a waiver to hire Ms.
24 Burnett?

25 MR. GREEN: Objection to form.

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THOMAS

A. That I -- that I don't know. I know -- I know she had to wait a while before I could hire her, and I am not -- I am not sure what -- background checks or anything that Steve did, if anything, but I -- I myself did not receive any written -- I don't believe I did to -- to hire her.

Q. Did you have a conversation with anyone at MSG regarding you hiring your niece?

A. Steve.

Q. And what discussions did you have with Steve regarding you hiring your niece?

A. When I was hired, I -- Raquel was my executive assistant in Indiana, and when I got here Katherine O'Gorman was Scott Laden's executive assistant, and I made the request that I wanted to bring my own in because there were some things that needed to be handled for me on a personal level and on the endorsement side and just people that I knew that it would -- it

THOMAS

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would be hard for Katherine to really get up to speed on a lot of my daily activities and other things that I have on my calendar. He said that he needed to -- I don't -- I'm not sure why Raquel couldn't come, but he -- I don't think she -- she got here until maybe -- maybe July or August.

Q. Did you tell Mr. Mills during that conversation that Ms. Burnett was your niece?

A. Yes, I did.

MR. SMITH: How much time do I have?

THE VIDEOGRAPHER: You have 20 minutes.

MR. SMITH: Can I go off the record for two seconds.

THE VIDEOGRAPHER: We are now going off the record at approximately 9:22 p.m.

(Discussion held off the record.)

THE VIDEOGRAPHER: We are now

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