```
1
   1.
44
       UNITED STATES DISTRICT COURT
   2
   3
       SOUTHERN DISTRICT OF NEW YORK
   4
       06 Civ. 0589 (CGE)
   5
      ANUCHA BROWNE-SANDERS,
   6
                 Plaintiff,
  7
  8
               against -
  9
 10
      MADISON SQUARE GARDEN, L.P., ISIAH LORD
      THOMAS, III, and JAMES DOLAN,
 11
 12
                 Defendants.
 13
                      January 19, 2007
                      10:01 a.m.
 14
 15
 16
           Videotaped Deposition of KARIN
      BUCHHOLZ, taken by Plaintiff, pursuant to
 17
      Notice, held at the offices of Vladeck
 18
      Waldman Elias & Engelhard, P.C., 1501
 19
      Broadway, New York, New York, before Todd
 20
 21
      DeSimone, a Registered Professional
      Reporter and Notary Public of the State of
 22
 23
      New York.
 24
 25
```

19 1 BUCHHOLZ 2 Q. And after the U.S. Olympic 3 Committee, where did you work next? 4 Α. At the NBA office for the WNBA. 5 I was the director of fan development for 6 the WNBA here in New York. 7 Q. And for how long did you work 8 for the WNBA? 9 Α. About a year and a half. 10 Q. Then what was your next 11 position? 12 Α. The position I currently have. 13 And that is vice president --0. 14 Α. Of Community Relations and Fan 15 Development for the New York Knicks. 16 Q. And you got that job when? 17 Α. I think it was September 9th, 18 Yes, after September 11th, yes. 2002. 19 Q. And describe the circumstances of your being hired as the vice president 20 of Community Relations and Fan Development 21 22 for the New York Knicks? 23 When I was working for the WNBA I attended a New York Liberty game and for 24 some reason I had a book that had all of 25

34 1. BUCHHOLZ person in this position, how they would 2 interface and interact with the Garden of 3 4 Dreams -- it wasn't the Garden of Dreams -- with the Cheering For Children 5 6 Foundation. 7 Now, once you got and accepted the job, were you given a job description, 8 whether formal or informal? 9 10 Α. Yes. 11 Q. Was it written or something 12 else? 13 Α. It was written. 14 What were your job functions at Q. 15 the time you were hired? 16 I haven't looked at that job 17 description for a long time. Being the liaison to community leaders, being the 18 liaison to the NBA, overseeing the Read to 19 Achieve Program, creating programs. 20 21 I don't know if I'm telling you what my 22 job is or if it was in the job 23 description. 24 Q. When is the last time you've looked at your job description? 25

```
40
 1.
                      BUCHHOLZ
 2
          Q.
                  Have you been notified what
 3
     your increase will be in this February or
 4
     March?
 5
          Α.
                  No.
 6
          Q.
                  And who do you believe is
     deciding what your raise will be?
 7
 8
                  I'm sure Mark Piazza will be
     doing my performance appraisal.
 9
10
         Q.
                  Just so it is clear, Mr. Piazza
11
     also reports to Mr. Mills?
12
         Α.
                  Yes.
13
                  Have you received any kind of
14
     bonus in calendar year '06?
15
         Α.
                  Yes.
16
         Q.
                  What was the bonus?
17
         Α.
                  Percentage or what the check
18
     was?
19
                 Percentage is fine.
         Q.
20
         Α.
                 Let me think.
21
         Q.
                 Or if it is easier just to say
22
     the number.
23
         Α.
                 I think it was around 30,000.
24
                 Now, when you were hired, was
         Q.
    it your understanding that you would be
25
```

41 1 BUCHHOLZ 2 reporting directly to Ms. Browne-Sanders? 3 Α. Yes. 4 Q. What, if anything, were you 5 told about who would be reporting to you? 6 Α. At the time that I was hired? 7 0. Correct. 8 At the time that I was hired, a Α. 9 person by the name of -- what was his 10 name -- Curtis Washington, who was -- I 11 think he was the manager of Community Relations at the time. Dan Gladstone was 12 13 the manager of Field Marketing. And at the time I was told that we were going to 14 15 hire an assistant for me. 16 Then under Dan Gladstone he had 17 a lot of part-time staffers that were his 18 field marketing staff. So they didn't 19 report directly to me, they reported to Dan as part of, you know, that came on 20 21 board for any of the events that we did. 22 Q. What was your understanding at 23 the time you were hired about what role 24 you would have in hiring and firing your 25 staff?