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1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 06 Civ. 0589 (CGE)

5 -----x  
6 ANUCHA BROWNE-SANDERS,

7 Plaintiff,

8 - against -

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

11 Defendants.

12 -----x  
13 December 11, 2006

14 10:00 a.m.

15 VIDEOTAPE DEPOSITION of JAMES  
16 DOLAN, taken by the 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  
20 Debbie Zaromatidis, a Shorthand Reporter  
21 and Notary Public of the State of New  
22 York.

1 DOLAN

2 the witness to testify fully to the extent  
3 of his knowledge but not otherwise to  
4 speculate or guess. You may answer the  
5 question to the extent you can answer it.

6 A. No, I am not -- I don't have any  
7 information about other than what Mr.  
8 Mills would have told me, and I don't  
9 recall specifically his telling me about  
10 the qualifications of either of those  
11 gentlemen.

12 Q. Did Mr. Mills at any point ask  
13 you for approval for Mr. Thomas to hire  
14 his niece as a direct report?

15 A. I believe Mr. Thomas,  
16 the -- prior to coming to work for us  
17 informed us that his niece was his  
18 assistant, and that he would wish to  
19 continue on with that arrangement, and I  
20 believe we agreed.

21 Q. Did you have any conversations  
22 with Mr. Thomas concerning his role in the  
23 Dale Thomas popcorn business?

24 A. Mr. Thomas told me about his  
25 investment in that business.

DOLAN

Q. When did he tell you about it?

A. I believe it was prior to his coming on with the company.

Q. And what did he say and what did you say?

A. I believe he told me he had an interest in the popcorn company, and that he needed us to know that before he came on because it was relatively in the same kind of area that -- that we are involved in in some form I guess you could say that. It used his name.

Q. Did you give him written approval to continue with the Dale Thomas business and to work at The Garden?

A. I believe I gave him verbal approval.

Q. And you believe that was before he joined --

A. I do.

Q. And is Dale Thomas a vendor at The Garden?

A. I believe they are.

Q. And are there roles with respect