

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

## ANUCHA BROWNE-SANDERS,

**Plaintiff,**

- against -

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

Defendants.

December 11, 2006

10:00 a.m.

VIDEOTAPE DEPOSITION of JAMES  
DOLAN, 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

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.

1 DOLAN

2 Q. When did he tell you about it?

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

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

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

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

17 A. I believe I gave him verbal  
18 approval.

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

21 A. I do.

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

24 A. I believe they are.

25 Q. And are there roles with respect