

COPY

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,

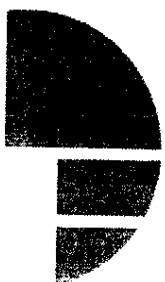
Defendants.
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VIDEOTAPED DEPOSITION OF LEON REIMER

New York, New York

Monday, January 22, 2007

REPORTED BY:
BARBARA R. ZELTMAN
Job No. 11465



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2 deposition, and I'll refer to the LR
3 numbers specifically. And we will
4 actually have copies for you.

5 MR. MINTZER: As you go
6 through them. That's fine.

7 MR. COZIER: As we refer to
8 them.

9 MR. MINTZER: Thank you.

10 MR. COZIER: Make it a little
11 simpler.

12 Q Mr. Reimer, when did you first
13 become acquainted with Ms. Sanders?

14 A On November 16, 2006.

15 Q And how did you become
16 acquainted with her at that time?

17 A I was requested by Ms. Vladeck
18 to meet Ms. Sanders and review her tax
19 returns.

20 Q When you say you were
21 "requested by Ms. Vladeck," when were you
22 contacted by Ms. Vladeck?

23 A In November 2006.

24 Q Approximately how long before
25 you actually met with Ms. Sanders?

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2 I worked for Mr. Anello that the Vladeck
3 firm was also involved in.

4 Q Describe for me the nature of
5 the Vladeck firm's involvement in that
6 other matter.

7 A I don't know.

8 Q What kind of services did you
9 render in that matter, regardless of the
10 person to whom you rendered the service?

11 A Handled a New York State
12 audit.

13 Q A New York State audit for an
14 individual?

15 A Yes.

16 Q And do you know what
17 connection, if any, the Vladeck firm had
18 with that individual?

19 A No.

20 Q In the notes that have been
21 marked as exhibits in this matter, it
22 indicates that there was a retainer
23 amount, requested initial retainer of
24 \$4,000.

25 Did your firm receive that

LEON REIMER

retainer?

A Yes.

Q And from whom was that
retainer received?

A The retainer was billed to
Ms. Sanders and paid by the Vladeck firm.

Q And when was that payment
made?

A I do not have the precise
date.

Q Are there any documents that
are part of the business of your firm that
are kept with regard to billings?

A Yes.

Q And are there documents that
are kept with regard to payments?

A Yes.

Q And are there documents that
you did not produce today that would
reflect the fact of the retainer, the
billing of the retainer and the name of
the party paying the retainer?

A Yes.

Q And what documents are those?