FEDER, KASZOVITZ, ISAACSON, WEBER, SKALA, BASS & RHINE LLP

Murray L. Skala (MS 9354) Jonathan D. Honig (JH 7577) 750 Lexington Avenue

New York, New York 10022

Phone: (212) 888-8200 Fax: (212) 888-5968

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP Jonathan J. Lerner (JL 7117) Michael H. Gruenglas (MG 8705) James Keyte (JK 0680) Maura B. Grinalds (MG 2836) Four Times Square New York, New York 10036

Phone: (212) 735-3000 Fax: (212) 735-2000

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WORLD WRESTLING ENTERTAINMENT, INC.

Plaintiff,

04 CV 8223 (KMK) (ECF CASE)

٧.

JAKKS PACIFIC, INC.; JAKKS PACIFIC (H.K.) LIMITED; ROAD CHAMPS LIMITED; THQ, INC.; THQ/JAKKS PACIFIC LLC; STANLEY SHENKER AND ASSOCIATES, INC.; STANLEY: SHENKER; BELL LICENSING, LLC; JAMES BELL; JACK FRIEDMAN; STEPHEN BERMAN; : JOEL BENNETT and BRIAN FARRELL,

_____X

Defendants.

NOTICE OF MOTION TO DISMISS THE SHERMAN ACT CLAIM IN THE AMENDED COMPLAINT

September 19, 2005

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Jonathan J.

Lerner, Esq., and the JAKKS Defendants' Memorandum of Law in Support of their

Motion to Dismiss the Sherman Act Claim in the Amended Complaint submitted herewith, and upon all prior pleadings and proceedings had herein, the JAKKS Defendants will, by and through their attorneys, move this Court before the Honorable Kenneth M. Karas at the United States Courthouse, 500 Pearl Street, New York, New York, at 12:00 p.m. on October 18, 2005, or as soon thereafter as counsel may be heard, for an order dismissing Plaintiffs' Sherman Act claim with prejudice and for such other and further relief as the Court deems just and proper.

Dated: September 19, 2005

(212) 888-8200

Respectfully submitted,

FEDER, KASZOVITZ, ISAACSON, WEBER, SKALA, BASS & RHINE LLP Murray L. Skala (MS 9354) Jonathan D. Honig (JH 7577) 750 Lexington Avenue New York, New York 10022 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

Jonathan J. Lerner (JL 7117)

Michael H. Gruenglas (MG 8705)

James Keyte (JK 0680)

Maura B. Grinalds (MG 2836)

Four Times Square

New York, New York 10036

(212) 735-3000

Attorneys for the JAKKS Defendants

By

CERTIFICATE OF SERVICE

The undersigned, an attorney duly admitted to practice law before this Court, hereby certifies under penalty of perjury, that on September 19, 2005, I caused true copies of the foregoing

- Notice of Motion to Dismiss the Sherman Act Claim in the Amended Complaint
- Declaration of Jonathan J. Lerner in Support of the Motion to Dismiss the Sherman Act Claim in the Amended Complaint
- JAKKS Defendants' Memorandum of Law in Support of Their Motion to Dismiss the Sherman Act Claim in the Amended Complaint

to be served upon the following parties by first-class mail:

Michael A. Cornman Schweitzer Cornman Gross & Bondell, LLP 292 Madison Avenue New York, NY 10017

Richard Schaeffer Dornbush Schaeffer Stongin & Weinstein, LLP 747 Third Avenue New York, NY 10017

Dated: New York, New York September 19, 2005

> s/ Michael H. Gruenglas Micahel H. Gruenglas (MG 8705)