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May 30, 2006

BY FACSIMILE

Honorable Kenneth M. Karas  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 920  
New York, New York 10007

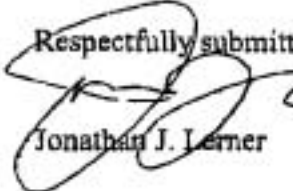
Re: World Wrestling Entertainment, Inc. v. JAKKS  
Pacific, Inc., et al., 1:04-CV-08223-KMK

Dear Judge Karas:

On behalf of the JAKKS Defendants, we write to seek clarification on the JAKKS Defendants' forthcoming motion to dismiss the RICO claims in WWE's Amended Complaint (the "Motion"), which is to be filed on June 2, 2006, pursuant to the Court's April 26, 2006 Order.

As the Court is aware, the Motion will be the JAKKS Defendants' first opportunity to address the RICO claims as changed by the Amended Complaint. In an effort to avoid the continuity arguments addressed to the Original Complaint, WWE has attempted to tack on new alleged predicate acts stretching back to late 1995. While we intend in our Motion to show that these new allegations still fail to satisfy the RICO continuity requirement, we also believe they underscore that WWE's RICO claims as set forth in the Amended Complaint are time-barred under the four-year statute of limitations applicable to RICO.

At the April 26, 2006 conference, I specifically referred to the statute of limitations as one of the Defendants' other RICO issues (Tr. at 12) and Your Honor's April 26, 2006 Order contains no limitation on the RICO dismissal arguments that may be raised. Nevertheless, as a matter of prudence, we are seeking to confirm before filing our brief that the Court did not intend to foreclose this additional ground for dismissal of WWE's amended RICO claims. Of course, we intend to fully comply with the page limits and deadlines set by the Court.

Respectfully submitted,  
  
Jonathan J. Lerner

*Jakks Defendants may include a statute of limitations argument in their motion to dismiss.*

cc: All counsel

SO ORDERED  
  
KENNETH M. KARAS U.S.D.J.