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UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

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WORLD WRESTLING ENTERTAINMENT, INC.,

04 CV 8223 (KMK) (ECF CASE)

Plaintiff.

- against -

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

Defendants.

NOTICE OF MOTION TO **DISMISS AMENDED COMPLAINT**

June 2, 2006

PLEASE TAKE NOTICE that, pursuant to the Orders of the Court dated April 26, 2006, and May 22, 2006, and upon the accompanying Memorandum Of Law Of Defendant THQ/JAKKS Pacific LLC (the "LLC") In Support Of Its Motion To Dismiss The Amended Complaint, submitted herewith, and upon all prior pleadings and proceedings had herein, the

LLC will, by and through their attorneys, move this Court before the Honorable Kenneth M. Karas at the United States Courthouse, Courtroom 21D, 500 Pearl Street, New York, New York, at 10:30 a.m. on September 6, 2006, or as soon thereafter as counsel may be heard, for an Order, pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(6) and 9(b), dismissing plaintiff's Amended Complaint as against the LLC with prejudice and for such other and further relief as the Court deems just and proper.

Dated: New York, New York June 2, 2006

Respectfully submitted,

DORNBUSH SCHAEFFER STRONGIN & VENAGLIA, LLP

By:

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