

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WORLD WRESTLING ENTERTAINMENT, INC.,

Plaintiff,

No. 04-CV-8223 (KMK)
Hon. Kenneth M. Karas

-against-

JAKKS PACIFIC, INC., et al.

ECF Case

Defendants.

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**THE SHENKER DEFENDANTS' REPLY MEMORANDUM
OF LAW IN FURTHER SUPPORT OF THEIR MOTION
TO DISMISS PLAINTIFF'S CLAIMS UNDER THE RICO ACT**

LAW OFFICES OF MICHAEL A. FREEMAN

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Counsel for Defendants Stanley Shenker and
Stanley Shenker and Associates, Inc.

Defendants Stanley Shenker and Stanley Shenker and Associates, Inc. (collectively, the “Shenker Defendants”) submit this reply memorandum of law in further support of their motion, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss Counts I and II of plaintiff’s amended complaint, which assert claims under sections 1962(c) and (d) of the RICO Act, respectively.

The Shenker Defendants hereby adopt and incorporate by reference the legal arguments contained the reply memoranda of law submitted by the Jakks Defendants and the THQ Defendants to the extent those arguments are applicable to the Shenker Defendants.

Dated: New York, New York
August 11, 2006

Respectfully submitted,

LAW OFFICES OF MICHAEL A. FREEMAN

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