

Motion to Dismiss the 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 April 14, 2005, or as soon thereafter as counsel may be heard, for an order dismissing plaintiffs' complaint with prejudice, or, in the alternative, to transfer this action pursuant to 28 U.S.C. § 1404(a) and for such other and further relief as the Court deems just and proper.

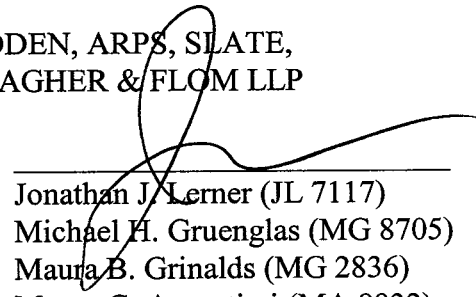
Dated: February 16, 2005

Respectfully submitted,

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