

SIDLEY AUSTIN BROWN & WOOD LLP
Steven M. Bierman (SB 6615)
Isaac S. Greaney (IG 0922)
787 Seventh Avenue
New York, New York 10019
Phone: (212) 839-5300
Fax: (212) 839-5599

IRELL & MANELLA LLP
Steven A. Marenberg (*Pro Hac Vice*)
Philip M. Kelly (*Pro Hac Vice*)
1800 Avenue of the Stars
Los Angeles, California 90067
Phone: (310) 277-1010
Fax: (310) 203-7199

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WORLD WRESTLING ENTERTAINMENT, INC.	:	Case No. 04 CV 8223 (KMK)
	:	(ECF CASE)
Plaintiff,	:	
	:	
v.	:	
	:	
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.	:	
-----		X

NOTICE OF MOTION TO DISMISS THE COMPLAINT

February 28, 2005

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of its Motion to Dismiss the Complaint submitted herewith, and upon all prior pleadings and proceedings had herein, THQ 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 plaintiff's 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 28, 2005

Respectfully submitted,

SIDLEY AUSTIN BROWN & WOOD LLP
Steven Bierman (SB 6615)
Isaac Greaney (IG 0922)
787 Seventh Avenue
New York, New York 10019

IRELL & MANELLA LLP
Steven A. Marenberg (Pro Hac Vice)
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1800 Avenue of the Stars
Los Angeles, California 90067

By: 
Steven A. Marenberg
Attorneys for Defendant THQ