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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.	:	
	:	
-----X		

**NOTICE OF MOTION TO DISMISS
COMPLAINT, OR ALTERNATIVELY, TO TRANSFER**

February 28, 2005

PLEASE TAKE NOTICE that, upon the accompanying Memorandum Of Law Of Defendant THQ/JAKKS Pacific LLC (the "LLC") In Support Of Its Motion To Dismiss The Complaint, Or Alternatively, To Transfer, 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, 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, transferring 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: New York, New York
February 28, 2005

Respectfully submitted,

DORNBUSH SCHAEFFER STRONGIN
& WEINSTEIN, LLP

By: /s/
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Attorneys for THQ/JAKKS Pacific LLC