

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WORLD WRESTLING ENTERTAINMENT, INC.,

Plaintiff,

-against-

JAKKS PACIFIC, INC.. et al.

Defendants.

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No. 04-CV-8223 (KMK)

Hon. Kenneth M. Karas

**DECLARATION**

***Electronically Filed***

MICHAEL A. FREEMAN, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am counsel to defendants Stanley Shenker and Stanley Shenker and Associates, Inc. (collectively the “Shenker Defendants”) in the above-captioned action. I submit this declaration to place before the Court the exhibits relied upon by the Shenker Defendants in support of their motion to dismiss or stay this action.

2. Attached as Exhibit A is a true and correct copy of the complaint in this action.

3. Attached as Exhibit B is a true and correct copy of a decision dated October 16, 2003 in the matter of Stanley Shenker and Associates, Inc. v. World Wrestling Federation Entertainment, Inc., No. X05-CV-0180933S (the “Connecticut Action”), 844 A.2d 964 (Conn. Super. 2003).

4. Attached as Exhibit C is a true and correct copy of the Second Amended Answer and Third Amended Counterclaim filed by World Wrestling Federation Entertainment, Inc. (“WWE”) in the Connecticut Action.

5. Attached as Exhibit D is a true and correct copy of a stipulated prejudgment remedy entered against the Shenker Defendants in the Connecticut Action.

6. Attached as Exhibit E is a true and correct copy of WWE's motion to "cite in" Stanley Shenker as a counterclaim-defendant in the Connecticut Action and a supporting memorandum of law.

Dated: New York, New York  
February 25, 2005

                                  /s/                                    
MICHAEL A. FREEMAN