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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WORLD WRESTLING ENTERTAINMENT, INC.,

Plaintiff,

v.

JAKKS PACIFIC, INC.; JAKKS PACIFIC (H.K.) LIMITED; ROAD CHAMPS LIMITED; THQ, INC.; THO/JAKKS PACIFIC LLC; STANLEY SHENKER AND ASSOCIATES, INC.; STANLEY SHENKER; BELL LICENSING, LLC; JAMES BELL; JACK FRIEDMAN; STEPHEN BERMAN; JOEL BENNETT; and BRIAN FARRELL,

Defendants.

Case No. 04 CV 8223 (KMK) (ECF CASE)

NOTICE OF MOTION TO DISMISS THE SHERMAN ACT CLAIM IN THE AMENDED COMPLAINT

September 19, 2005

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of its Motion to Dismiss the Amended Complaint submitted herewith, which joins in the Memorandum submitted by the Jakks Defendants, and upon all prior pleadings and proceedings had herein, defendants THQ, Inc. and Brian Farrell 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, on a date and at a time designated by the Court, for an order dismissing plaintiff's Sherman Act claim in the Amended Complaint with prejudice and for such other and further relief as the Court deems just and proper.

Dated: September 19, 2005

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

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By:

Philip M. Kelly

Attorneys for Defendants THQ, Inc. and

Brian Farrell