

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; STANLEY SHENKER	:	
AND ASSOCIATES, INC.; STANLEY SHENKER;	:	
BELL LICENSING, LLC; JAMES BELL; JACK	:	
FRIEDMAN; STEPHEN BERMAN; JOEL	:	
BENNETT; and BRIAN FARRELL,	:	
	:	
Defendants.	:	
	:	

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**NOTICE OF MOTION TO DISMISS THE RICO CLAIMS
IN THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of its Motion to Dismiss the RICO Claims in 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 (the "THQ 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, on a date and at a time designated by the Court, for an order dismissing plaintiff's RICO claims against the THQ Defendants in the Amended Complaint with prejudice, dismissing the remainder of the claims

alleged against the THQ Defendants for lack of federal jurisdiction, and for such other and further relief as the Court deems just and proper.

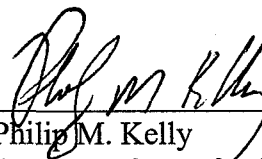
Dated: June 2, 2006

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Respectfully submitted,

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