

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>WORLD WRESTLING ENTERTAINMENT, INC.,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JAKKS PACIFIC (H.K.) LIMITED, ROAD CHANMPS LIMITED, THQ, INC., THQ/JAKKS PACIFIC L.L.C., THE JOINT VENTURE OF THQ, INC., STANLEY SHENKER ASSOCIATES, INC., STANLEY SHENKER, BELL LICENSING, L.L.C., JAMES BELL, JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-08223-KMK Electronically Filed</p>
<p>LYDIA GARCIA, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-08807-KMK Electronically Filed</p>
<p>QUANTUM EQUITIES L.L.C., individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEVEN G. BERMAN and JOEL M. BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-08877-KMK Electronically Filed</p>

(captions continued on following page)

**MOTION OF QUANTUM EQUITIES LLC AND FRANK WHITING
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

<p>JAMES T. KAHN, on behalf of himself and all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, JOEL BENNETT and STEPHEN BERMAN,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-08910-KMK Electronically Filed</p>
<p>JONCO INVESTORS, LLC, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-09021-KMK Electronically Filed</p>
<p>JAMES IRVINE, individually and on behalf of all others similarly situated,</p> <p style="text-align: right;">Plaintiff,</p> <p>vs.</p> <p>JAKKS PACIFIC, INC., JACK FRIEDMAN, STEPHEN BERMAN and JOEL BENNETT,</p> <p style="text-align: right;">Defendants.</p>	<p>Civil Action No. 1:04-cv-09078-KMK Electronically Filed</p>

**MOTION OF QUANTUM EQUITIES LLC AND FRANK WHITING
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF LEAD COUNSEL**

Plaintiffs Quantum Equities LLC and Frank Whiting, upon the January 4, 2005 Declaration of Gustavo Bruckner, Esq., and the exhibits annexed thereto, the accompanying Memorandum of Law, all of the prior pleadings and proceedings had herein, and such other evidence as the Court

may consider at the hearing on this motion, moves this Court for an order in the form filed herewith:

- (i) consolidating the above-referenced actions; (ii) appointing Quantum Equities LLC and Frank Whiting as Lead Plaintiff in the above-referenced actions pursuant to Section 21D of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995; and (iii) approving Lead Plaintiff's selection of Lead Counsel.

DATED: January 4, 2005
New York, NY

Respectfully submitted,

**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP**

By: /s/
Fred Taylor Isquith, Esq.
Gustavo Bruckner, Esq.
Christopher Hinton, Esq.
270 Madison Avenue
New York, New York 10016
Telephone: (212) 545-4600
Facsimile: (212) 545-4653

Proposed Lead Counsel

Louis F. Burke, Esq.
Louis F. Burke P.C.
460 Park Avenue, 21st Floor
New York, NY 10022
Telephone: 212/682-1700
Facsimile: 212/808-4280

Additional Plaintiffs' Counsel