

LAW OFFICES OF MICHAEL A. FREEMAN
Michael A. Freeman (MAF-9600)
24 West 40th Street, 17th Floor
New York, New York 10018
(646) 366-0881

Counsel for Defendants Stanley Shenker
and Stanley Shenker and Associates, Inc.

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.

-----x

No. 04-CV-8223 (KMK)
Hon. Kenneth M. Karas

NOTICE OF MOTION

Electronically Filed

PLEASE TAKE NOTICE that upon the declaration of Michael A. Freeman, Esq., dated February 25, 2005, the exhibits attached thereto, and the memorandum of law submitted herewith, defendants Stanley Shenker and Stanley Shenker and Associates, Inc. (the collectively "Shenker Defendants") will move this Court before the Honorable Kenneth M. Karas, at the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time designated by the Court, for an Order:

1. pursuant to Fed. R. Civ. P. 12, dismissing or staying this action against the Shenker Defendants;

2. in the alternative, pursuant to 28 U.S.C. § 1404(a), transferring this action to a more convenient forum; and

3. for such other and further relief as the Court deems just and proper.

Dated: New York, New York
February 25, 2005

LAW OFFICES OF MICHAEL A. FREEMAN

By: _____ /s/
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