

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.

