

# EXHIBIT E

|                                     |   |                    |
|-------------------------------------|---|--------------------|
| DOCKET NO.: X05 CV-00-0180933-S     | : | SUPERIOR COURT     |
|                                     | : |                    |
| STANLEY SHENKER & ASSOCIATES, INC., | : | COMPLEX LITIGATION |
| Plaintiff,                          | : | DOCKET             |
|                                     | : |                    |
| vs.                                 | : | AT STAMFORD        |
|                                     | : |                    |
| WORLD WRESTLING FEDERATION          | : |                    |
| ENTERTAINMENT, INC.,                | : |                    |
| Defendant.                          | : | FEBRUARY 16, 2005  |

## MOTION TO CITE IN COUNTERCLAIM DEFENDANT

Defendant/counterclaim plaintiff, World Wrestling Federation Entertainment, Inc. (“WWE”), moves pursuant to Practice Book Sections 9-18 and 9-22 and Connecticut General Statutes Sections 52-102 to cite in Stanley Shenker as a counterclaim defendant in this action. Specifically, WWE seeks to amend its counterclaim to assert a corporate veil piercing claim against Stanley Shenker and thereby hold him personally liable for the acts he committed under the guise of his corporation, Stanley Shenker & Associates, Inc. In support of its motion, WWE has this date also submitted a memorandum of law.

Wherefore, WWE respectfully requests the Court grant its motion to cite in and allow WWE to serve an amended counterclaim on Stanley Shenker.

|                                     |   |                    |
|-------------------------------------|---|--------------------|
| DOCKET NO.: X05 CV-00-0180933-S     | : | SUPERIOR COURT     |
|                                     | : |                    |
| STANLEY SHENKER & ASSOCIATES, INC., | : | COMPLEX LITIGATION |
| Plaintiff,                          | : | DOCKET             |
|                                     | : |                    |
| vs.                                 | : | AT STAMFORD        |
|                                     | : |                    |
| WORLD WRESTLING FEDERATION          | : |                    |
| ENTERTAINMENT, INC.,                | : |                    |
| Defendant.                          | : | FEBRUARY 16, 2005  |

**MEMORANDUM OF LAW IN SUPPORT OF  
WWE'S MOTION TO CITE IN COUNTERCLAIM DEFENDANT**

Defendant/counterclaim plaintiff, World Wrestling Federation Entertainment, Inc. (“WWE”), moves pursuant to Practice Book Sections 9-18 and 9-22 and Connecticut General Statute Section 52-102 to cite in Stanley Shenker (“Shenker”) as a counterclaim defendant in this action. Specifically, WWE seeks permission to amend its counterclaim to assert a corporate veil piercing claim against Shenker and thereby hold him personally liable for the acts he committed under the guise of his corporation, Stanley Shenker & Associates, Inc. (“SSAI”).

**I. Background Facts**

By its third amended counterclaim WWE alleges various claims arising under state law against SSAI arising out of the improper conduct of its president, Shenker, and his co-conspirator and former WWE executive, James K. Bell (“Bell”). Among these claims are breach of fiduciary duty, conversion, statutory theft, conspiracy and fraud. WWE recognizes that the Court is quite familiar with the underlying facts of the case, as well as the improper discovery conduct of SSAI,