

JOHN R. WILLIAMS AND ASSOCIATES, LLC
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Attorney for Defendants Bell Licensing, LLC, and James Bell

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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WORLD WRESTLING ENTERTAINMENT, INC., :

Plaintiff, :

- against - :

JAKKS PACIFIC, INC.; JAKKS PACIFIC (H.K.)
LIMITED; ROAD CHAMPS LIMITED; THQ, INC.;
THQ/JAKKS PACIFIC LLC, THE JOINT VENTURE
OF THQ, INC. and JAKKS PACIFIC, INC.;
STANLEY SHENKER AND ASSOCIATES, INC.;
STANLEY SHENKER; BELL LICENSING, LLC;
JAMES BELL; JACK FRIEDMAN; STEPHEN
BERMAN and JOEL BENNETT, :

Defendants. :

-----X

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

NOTICE OF MOTION

Electronically Filed

PLEASE TAKE NOTICE that upon the declaration of John R. Williams, Esq., dated February 28, 2005, and the memorandum of law submitted herewith, defendants Bell Licensing, LLC, and James Bell 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 defendants Bell Licensing, LLC, and James Bell;

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

Dated: New Haven, Connecticut
February 28, 2005

JOHN R. WILLIAMS AND ASSOCIATES, LLC

By: _____ /s/

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