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9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA
 11 WESTERN DIVISION

11 MGA ENTERTAINMENT, INC., a
 12 California corporation,
 13 Plaintiff,

14 vs.

15 MATTEL, INC., a Delaware
 16 corporation, and ROBERT A.
 ECKERT
 17 Defendants.

CASE NO. CV 11-1063 JHN (AJWx)

Related Cases:

Case No. CV 04-9049 DOC (RNBx)
 Consolidated With:
 Case No. CV 04-09059
 Case No. CV 05-02727

Hon. Jacqueline H. Nguyen

**MATTEL, INC.'S NOTICE OF
 RELATED CASES**

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1 Pursuant to Local Rule 83-1.3, Defendants Mattel, Inc. and Robert A. Eckert
2 (collectively “Mattel”) hereby provide notice of related consolidated cases currently
3 pending in the Central District of California. Such cases arise from the same or a
4 closely related transaction, happening, or event as the 11-1063 case presently before
5 this Court, call for determination of the same or substantially related or similar
6 questions of law and fact, and would entail substantial duplication of labor if heard
7 by different judges:

8 Bryant v. Mattel, Inc., Case No. CV 04-9049 DOC (RNBx);

9 Consolidated With:

10 Mattel, Inc. v. Bryant, Case No. CV 04-9059;

11 MGA Entertainment, Inc. v. Mattel, Inc., Case No. CV 05-2727.

12 MGA Entertainment, Inc. (“MGA”) filed the 11-1063 case against Mattel on
13 February 3, 2011, asserting claims for alleged violation of Section 2 of the Sherman
14 Act (15 U.S.C. § 2), abuse of process, and violation of Section 17043 of the
15 California Business and Professions Code (Cal. Bus. & Prof. Code § 17043). MGA
16 served its summons and complaint on Mattel on February 4, 2011.

17 The facts allegedly giving rise to MGA’s antitrust and abuse of process
18 claims in the 11-1063 case include the same facts underlying MGA’s pending trade
19 secret and unfair competition claims and its RICO and wrongful injunction claims
20 that were previously dismissed by the Court. In addition to alleging the same facts
21 supporting its claims in the related cases, MGA acknowledges in the 11-1063
22 complaint that the related cases are relevant to Mattel’s statute of limitations and res
23 judicata defenses.

24 On February 3, 2011, MGA filed its Notice of Related Cases and
25 acknowledged that the cases “call for determination of substantially related or
26 similar questions of law” and “assignment of the present action to a different judge .
27 . . would likely entail substantial duplication of labor because the legal issues
28 involved significant overlap.” Dkt. No. 3 at 1.

1 Based on the foregoing, Mattel respectfully submits that the present action
2 qualifies for related case transfer.

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DATED: February 7, 2011

QUINN EMANUEL URQUHART &
SULLIVAN. LLP

By /s/ Michael T. Zeller
Michael T. Zeller
Attorneys for Mattel, Inc. and Robert A.
Eckert