UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WPIX. INC., WNET.ORG, **AMERICAN** BROADCASTING COMPANIES, INC., DISNEY ENTERPRISES, INC., CBS BROADCASTING INC., STUDIOS INC., THE CBS CW **STATIONS TELEVISION** INC., NBC STUDIOS, UNIVERSAL. INC., NBC INC., UNIVERSAL NETWORK TELEVISION, LLC, TELEMUNDO NETOWRK GROUP LLC, NBC TELEMUNDO LICENSE COMPANY, OFFICE OF THE COMMISSIONER OF BASEBALL, MLB ADVANCED MEDIA, L.P., COX MEDIA GROUP, INC., FISHER **BROADCASTING-**SEATTLE TV, L.L.C., TWENTIETH CENTURY FOX FILM CORPORATION, FOX TELEVISION STATIONS, INC., TRIBUNE **TELEVISION** HOLDINGS. INC., TRIBUNE **TELEVISION** NORTHWEST, INC., UNIVISION TELEVISION GROUP, INC., THE UNIVISION NETWORK LIMITED PARTNERSHIP, **TELEFUTURA** NETWORK, WGBH **EDUCATIONAL** FOUNDATION. THIRTEEN. and **PUBLIC BROADCASTING SERVICE**,

Docket No.: 10 Civ. 7415 (NRB)

NOTICE OF CROSS-MOTION TO TRANSFER PURSUANT TO 28 USC 1404 AND TO DIMISS FOR LACK OF PERSONAL JURISDICTION

(Oral Argument Requested)

Plaintiffs,

- against -

IVI, INC. and TODD WEAVER,

Defendants.

PLEASE TAKE NOTICE that upon the declaration of Todd Weaver and the Exhibits annexed thereto and the Memorandum of Law submitted in support of Defendants' motion the Defendants ivi, INC. and Todd Weaver, by and through their attorneys, Nissenbaum Law Group, LLC and Black Lowe & Graham, PLLC, will move this Court before the Honorable Naomi Reice Buchwald, United States District Court Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, where counsel may be heard for an Order:

1. Pursuant to 28 U.S.C. § 1404, transferring the within matter to the United States District Court, Western District of Washington;

2. Dismissing the complaint against Defendant Todd Weaver on the grounds that the court lacks personal jurisdiction over this Defendant; and,

3. Granting such other, further and different relief as to this Court seems just, equitable and proper under the circumstances.

PLEASE TAKE FURTHER NOTICE that in accordance with Local Rule 6.1(b), answering papers, if any, are to be served within fourteen (14) business days after service of these moving papers.

PLEASE TAKE FURTHER NOTICE that Defendants request oral argument.

Dated: October 19, 2010 Union, New Jersey

> NISSENBAUM LAW GROUP, LLC Attorneys for Defendants ivi, INC. and Todd Weaver

/S/ GAVIN I. HANDWERKER By: Gavin Handwerker (GIH 6191) 2400 Morris Avenue, 3rd Floor Union, New Jersey 07083 Telephone: (908) 686-8000 Facsimile: (908) 686-8550 E-mail: gih@gdnlaw.com

-and-

Lawrence D. Graham Ellen M. Bierman Black Lowe & Graham, PLLC 701 Fifth Avenue, Suite 4800 Seattle, Washington 98104 (206) 381-3300 (206) 381-3301 graham@blacklaw.com bierman@blacklaw.com

To: Peter Zimroth, Esq. ARNOLD & PORTER, LLP Attorneys for Plaintiffs 399 Park Avenue New York, New York (212) 715-1000

-and-

Robert Alan Garrett Hadrian R. Katz C. Scott Morrow ARNOLD & PORTER, LLP 555 Twelfth Street, NW Washington, D.C. 20004 (202) 942-5000