## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

INC.. WNET.ORG, AMERICAN WPIX. BROADCASTING COMPANIES, INC., DISNEY ENTERPRISES, INC., CBS BROADCASTING INC., THE **CW** INC... **CBS STUDIOS** INC., **NBC TELEVISION STATIONS** UNIVERSAL, INC., NBC STUDIOS, 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 PARTNERSHIP, LIMITED **TELEFUTURA** NETWORK, **EDUCATIONAL** WGBH FOUNDATION. THIRTEEN, and **PUBLIC** BROADCASTING SERVICE,

Plaintiffs,

- against -

IVI, INC. and TODD WEAVER,

Defendants.

## MEMO ENDORSED

Docket No.: 10 Civ. 7415 (NRB)

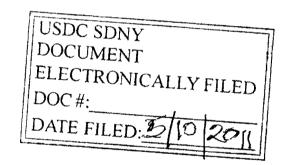
ENDORSEHENT

Heried on the recor

February 2, 2011.

NOTICE OF CROSS-MOTION TO TRANSFER PURSUANT TO 28 USC 1404 AND TO DIMISS FOR LACK OF PERSONAL 5/10/11

(Oral Argument Requested)



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

Case 1:10-cv-07415-NRB Document 18 Filed 10/20/10 Page 2 of 3

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-

2

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