

# EXHIBIT 10

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May 25, 2012

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VIA E-MAIL

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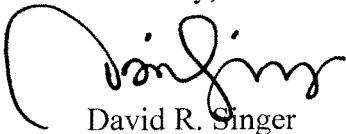
Re: DISH Network LLC v. American Companies, Inc. et al., 12 Civ. 4155 (LTS)(KNF)(SDNY)

Dear Mr. Bricks:

This responds to your letter to Richard Stone from earlier today. We are surprised that DISH is attempting to rely on the first-filed doctrine as a basis for requesting a stay, transfer, or dismissal of Fox's lawsuit against DISH that was filed in the Central District of California a mere 29 minutes after DISH's declaratory relief action was filed in the Southern District of New York. Where, as here, the actions were essentially filed simultaneously, the first-filed doctrine does not apply. Furthermore, please be advised that Fox intends to bring a motion to dismiss DISH's lawsuit on the grounds that it is an improper anticipatory filing, a sham declaratory relief action, and an obvious attempt to forum shop. Consistent with Judge Swain's procedures, we will provide you with a more detailed outline of Fox's legal and factual position shortly.

Given that the parties may be filing cross motions on related issues, we suggest having a telephone conference after the holiday weekend to discuss all matters, as well as a proposed briefing schedule. We are available for such a call on Tuesday afternoon or Wednesday.

Sincerely,



David R. Singer  
Partner