

EXHIBIT 15

Echtman, Elyse D.

From: Gallegos, Amy M. [AGallegos@jenner.com]
Sent: Monday, May 28, 2012 10:01 PM
To: Echtman, Elyse D.
Cc: Stone, Richard L.; Thomas, Andrew J.; Bicks, Peter A.; Kohlmann, Susan J.; Singer, David R.
Subject: RE: Dish v. ABC, et al. (SDNY)

Dear Elyse:

This letter responds to your email to David Singer at 4:30 EST this Memorial Day afternoon, announcing for the first time that tomorrow morning Dish intends to ask the District Court in New York to take the extraordinary step of issuing a temporary restraining order enjoining Fox's properly-filed copyright infringement action against Dish from proceeding in the Central District of California.

As a preliminary matter, we note that your correspondence of Friday May 25, Saturday May 26, and Sunday May 27 did not disclose that you were filing an application for a TRO. Instead - without ever mentioning your anticipated TRO - you demanded that we agree to dismiss or stay Fox's lawsuit so that you could seek some unspecified relief from Judge Swain without having to respond to Fox's expedited discovery motion by the May 30 deadline. We informed you that we were reviewing the authority cited in your letter and consulting with our client, and we would be happy to meet and confer with you on Tuesday, May 29 - the first business day after the holiday weekend. We also informed you that we were willing to discuss the timing and scope of the discovery. Since Dish's response to Fox's expedited discovery motion is not due until May 30, and since there was nothing preventing Dish from raising these issues in its response to Fox's motion, there was no need to rush to evaluate Dish's arguments, prepare a response, and meet and confer over the holiday weekend. Of course, if you had notified us that you were preparing a TRO to file Tuesday morning our response might have been different - but presumably you decided not to inform us of that fact because you did not want us to have the opportunity over the weekend to prepare an opposition or arrange for counsel in New York to appear and represent Fox's interests.

It is not clear from any of your correspondence what irreparable harm Dish believes it is facing that justifies a TRO on less than a day's notice the morning after a holiday weekend. It is Fox, not Dish, that is being irreparably harmed. As set forth in Fox's complaint, Dish is openly and continuously infringing Fox's copyrights by, among other things, copying Fox's primetime programming every night, without authorization, in order to offer its subscribers a bootleg video-on-demand service. As you are aware, there is a motion pending in the Central District of California for expedited discovery in aid of Fox's anticipated preliminary injunction motion. If Dish needs another few days to respond to the expedited discovery motion, we can probably accommodate you -- but Fox cannot agree to hold the California action in abeyance since Fox is being irreparably harmed every day that the California action is delayed, while Dish continues to profit from its ongoing infringement. If Dish will agree to immediately cease and desist its infringing Primetime Anytime and Auto Hop services, then Fox will agree to stay the California action while the District Court in New York considers Fox's motion to dismiss Dish's concededly anticipatory declaratory judgment action, and whatever motion Dish intends to bring relating to venue. Please let us know if you are amenable to this and, if so, we will meet and confer tomorrow about a briefing schedule for both motions.

If your client elects to proceed with its TRO, we request that you include a copy of this email with your filing, as well as all other emails and letters exchanged since Friday. Additionally, as we have not received Dish's OSC and TRO papers yet, please serve a copy of all papers filed in connection with Dish's Order to Show Cause and TRO application by email as soon as possible on me, David Singer, Rick Stone (rstone@jenner.com), A.J. Thomas (ajthomas@jenner.com), and Susan Kohlmann (skohlmann@jenner.com). Ms. Kohlmann is in our New York office, located at 919 Third Ave, 37th Floor, New York, NY, 10022-3908.