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November 27, 2012

Liberty Media Holdings, LLC
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Re: *FF Magnat Limited v. Liberty Media Holdings LLC*

Dear Sir or Madam,

Please recall that this law firm represents FF Magnat Limited (“Oron”).

As you know, Oron filed a demand for arbitration with JAMS pursuant to the settlement agreement (the “Agreement”) enforced by the Nevada court. I understand that Liberty Media contacted JAMS and stated that, despite the arbitration provisions in the Agreement, Liberty Media did not agree to arbitrate this dispute with JAMS. Given that JAMS is a nationally recognized reputable arbitration forum, I see Liberty’s refusal to arbitrate with JAMS as nothing more than a dilatory tactic designed to increase Oron’s expenses.

I urge Liberty to reconsider its position. In the event that Liberty continues to refuse to arbitrate with JAMS, please provide me with a list of three (3) nationally recognized reputable arbitration forums under which Liberty agrees to arbitrate the present dispute. Oron will then select one of these forums and proceed with arbitration.

Please be advised that in the event that Liberty fails to provide me with these options within five (5) business days from the date hereof (that is, no later than 5 pm Eastern time on December 4, 2012), Oron shall file an action to compel arbitration.

Thank you for your attention to the foregoing.

Very Truly Yours,


Valentin Gurvits, Esq.