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VIA E-Mail
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Anne M. Lockner
Robins Kaplan LLP
800 LaSalle Avenue, Suite 2800
Minneapolis, MN 55402

RE: HHCA Denies All Allegations by AHCA and Considers this Matter Closed

M&G No. 20020.0001USAA

Dear Anne,

The American Highland Cattle Association (“AHCA”) has harassed the Heartland Highland Cattle Association (“HHCA”) with unfounded allegations of copyright infringement since February 10, 2025. While HHCA has spent the last nine months engaging in good faith efforts to resolve this issue, it has become clear that AHCA has no intentions of following through on those efforts.

Instead, it appears AHCA’s true goal is to improperly leverage and expand the scope of its narrow “compilation of database information” copyright, Registration No. TX 9-425-754, to cover underlying factual information it is not entitled to. AHCA’s copyright allegedly covers a compilation of database information. It does not cover an animal’s name, breeding records, genetic information, pedigree, or similar factual information. Nonetheless, AHCA has shown over the last nine months that it does not actually care what the law says its copyright covers so long as it can prevent HHCA from creating and maintaining its own registry.

In light of the above and as set forth in prior correspondence, HHCA denies all allegations asserted by AHCA and considers this matter to be closed. HHCA reserves all rights and defenses to AHCA’s unfounded allegations, including the right to bring Antitrust Counterclaims pursuant to the Sham-litigation exception to the Noerr-Pennington Doctrine and the right to recover Attorneys’ fees incurred defending baseless litigation.

Best regards,

A handwritten signature in black ink that reads "Peter Selness".

Peter Selness

cc: Heartland Highland Cattle Association Board of Directors