

February 10, 2025

Harold Ramey
Board of Directors
Heartland Highland Cattle Association
976 State Hwy. 64
Tunas, MO 65764
heartlandhighlandcattle@gmail.com

VIA EMAIL AND DIRECT MAIL**Re: *Infringement of AHCA Intellectual Property***

Dear Mr. Ramey and the HHCA Board of Directors:

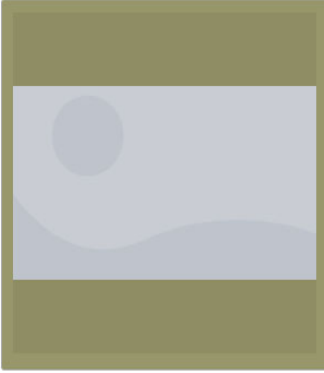
We represent the American Highland Cattle Association (AHCA) in various intellectual property matters. As you know, AHCA is America's oldest organization dedicated to preserving the integrity of the Highland cattle breed.

For at least seventy-five years, AHCA has maintained a registry of Highland cattle (the AHCA Registry). The AHCA Registry traces directly to imported purebred cattle from Scotland. The AHCA Registry is a closed system — Highland cattle can only be entered into the AHCA Registry upon satisfaction of certain criteria. AHCA's Registry contains over seventy-five years' worth of unbroken ancestral lineage records for Highland cattle. The AHCA Registry includes creative articulations of Highland cattle selected and arranged by, among other things, AHCA-specific name, AHCA registration number, sex, sire, dam, color, birth date, breeder, current owner, progeny, tattoo, registration status, and registration date.

This letter concerns the Heartland Highland Cattle Association's (HHCA's) infringement of AHCA's intellectual property rights in its AHCA Registry. It has come to AHCA's attention that HHCA appears to have scraped significant portions of the AHCA Registry for HHCA's own Highland cattle registry. HHCA's registry contains voluminous, AHCA-specific information such as AHCA cattle names, registration numbers, and progeny information. As one example, the animal CBS Yaz's Yukon Jack appears in HHCA's registry with *only* AHCA information — the animal's AHCA name, registration number, and progeny information.

CBS Yaz's Yukon Jack ♂

| Exposed Dates | Health |
|----------------------------|-----------------|
| Name: CBS Yaz's Yukon Jack | DNA Completed: |
| Reg #: | DNA Case #: |
| Date of Registration: | DOD: |
| Alt Reg #: AHCA 51519 | Cause of death: |
| Sex: Bull | |
| DOB: | |
| EID or RFID: | |
| Left Ear Tattoo: | |
| Color: | |
| Date of Ownership: | |
| Breeder: | |
| Owner: | |
| Country of origin: | |
| Price: | |



Numerous animals – such as the animal WL Genesis, shown below – appear in HHCA’s registry, identified solely by AHCA-specific name and registration number.

WL Genesis ♂

| Exposed Dates | Health |
|-----------------------|-----------------|
| Name: WL Genesis | DNA Completed: |
| Reg #: | DNA Case #: |
| Date of Registration: | DOD: |
| Alt Reg #: AHCA 59067 | Cause of death: |
| Sex: Bull | |
| DOB: | |
| EID or RFID: | |
| Left Ear Tattoo: | |
| Color: | |
| Date of Ownership: | |
| Breeder: | |
| Owner: | |
| Country of origin: | |
| Price: | |

HHCA is free to develop and maintain its own registry. It is not, however, free to scrape AHCA’s Registry wholesale and otherwise exploit AHCA’s intellectual property rights in its AHCA Registry. We request that HHCA immediately cease and desist from further violations of AHCA’s intellectual

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property and remove all AHCA-specific information scraped from the AHCA Registry. We further request that by **February 24, 2025** HHCA confirm in writing its agreement to: (1) cease and desist from scraping data from the AHCA Registry; (2) cease and desist use of AHCA-specific information such as AHCA's naming conventions and registration numbers; and (3) cease and desist use of AHCA's progeny information.

AHCA is not a litigious organization. It has no desire to engage in costly and protracted legal proceedings with HHCA. On the other hand, AHCA has spent decades developing and maintaining the AHCA Registry. It cannot permit HHCA simply to scrape the AHCA Registry wholesale. If HHCA is not willing to resolve this matter quickly as outlined in this letter, AHCA reserves its right to take all actions necessary to protect its intellectual property rights from HHCA's unauthorized acts.

If you have any questions regarding AHCA's position in this matter, please contact me. We await your prompt response.

Sincerely,

/s/ William E. Manske

William E. Manske
Partner

cc: AHCA Board of Directors