



Attn: User Support, DMCA Complaints
 Google, Inc
 [REDACTED] Pkwy
 Mountain View
 CA 94043
 U S A

Fax: [REDACTED] (Priority)
 Textphone: [REDACTED] (Library)
 Textphone: [REDACTED] (Woodburn House)

7th April 2004

Dear Sir/Madam

Notification of Infringement of Health Scotland Copyright by www.healthbaby.net

I am writing to you, as advised by The Google Team on 4th February 2004, to request the removal of the website www.healthbaby.net from all Google search engine listings and directories world-wide due to it being a fraudulent website. The 'healthbaby' website is an infringement of copyright law as it wholly reproduces content that is owned by our organisation, NHS Health Scotland (formerly the Health Education Board for Scotland (HEBS)), and is taken from our website www.hebs.com/readysteadybaby.

By visiting our *ReadySteadyBaby* website, you will see that the site is branded with our corporate logo. This logo links to our corporate website which contains our terms and conditions (<http://www.healthscotland.com/terms/index.cfm>) that apply to our Health Scotland web services, including *readysteadybaby*.

That 'healthbaby' is a fraudulent site can be demonstrated by visiting the following page on 'healthbaby' <http://www.healthbaby.net/moreinfo/obtain.htm>. This page contains details on how to obtain a copy of the *ReadySteadyBaby* book, also published by our organisation and on which our ReadySteadyBaby website is based. The page contains contact address, telephone and fax details for our organisation, which you can compare with the contact details contained in this letter, although the organisation name has been changed to 'healthbaby'.

We performed searches on www.google.co.uk, with 'the web' radio button selected, in order to establish if the 'healthbaby' website appeared in Google search engine listings. Details of the searches performed and the search results containing the URL for the 'healthbaby' website are provided below:

Search phrase: healthbaby
Search result(s): Healthbaby.net/privacy
www.healthbaby.net/privacy.htm

ReadySteadyBaby! – Site Map
www.healthbaby.net/sitemap.htm

Edinburgh Office

[REDACTED], [REDACTED] Lane, Edinburgh [REDACTED]
 Tel: [REDACTED] Fax: [REDACTED]

Glasgow Office

[REDACTED], [REDACTED] Place, Glasgow [REDACTED]
 Tel: [REDACTED] Fax: [REDACTED]


We have on previous occasions attempted to contact the 'healthbaby' domain owners to advise them that their reproduction of our content is an infringement of copyright law and to insist they remove our content immediately. We have also pursued legal action through our NHSScotland lawyers. However, we have been unsuccessful in our attempts to have this fraudulent website withdrawn.

I have a good faith belief that use of the copyrighted materials described above on the allegedly infringing web pages is not authorised by the copyright owner, its agent, or the law.

I swear, under penalty of perjury consistent with United States Code Title 17, Section 512, that the information in the notification is accurate and that I am copyright owner or am authorised to act on behalf of the owner of an exclusive right that is allegedly infringed.

Yours faithfully



Dr 
Consultant in Public Health Medicine/
Director of Health Information

End

cc , Chief Executive