



Attn: [REDACTED]
Google, Inc

[REDACTED]
Mountain View
CA 94043

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

19 July 2004

Dear Sir/Madam

Google DCMA Complaint #9351454: Notification Infringement of Health Scotland Copyright by www.healthbaby.net

I wrote to you on 04 April 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. This 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'.

Since receiving my letter the Google Team have advised by email that I write to you again including a full listing of all the pages on the 'healthbaby' website which we believe to be infringing on our copyright. Please find attached a complete list of all pages on the 'healthbaby' website, all of which we believe to infringe on our copyright.

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 However, we have been unsuccessful in our attempts to have this fraudulent website withdrawn.

Edinburgh Office
[REDACTED] Edinburgh EH10 4SG
Tel: [REDACTED] Fax: [REDACTED]
www.healthscotland.com

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,



Consultant in Public Health Medicine/
Director of Health Information

Encls:

cc:

Listing of all pages on www.healthbaby.net infringing Health Scotland Copyright**www.healthbaby.net**Privacy <http://www.healthbaby.net/privacy.htm>¹**Pregnancy <http://www.healthbaby.net/pregnancy/index.htm>**How do you know you are pregnant? <http://www.healthbaby.net/pregnancy/howdoyou.htm>How long is pregnancy? <http://www.healthbaby.net/pregnancy/howlong.htm>Making choices <http://www.healthbaby.net/pregnancy/makingchoices.htm>Medical terms <http://www.healthbaby.net/pregnancy/medicalterms.htm>Healthy eating in pregnancy <http://www.healthbaby.net/pregnancy/healthyeating.htm>Foods to avoid <http://www.healthbaby.net/pregnancy/foodstoavoid.htm>Physical activity and exercise <http://www.healthbaby.net/pregnancy/physical.htm>Smoking – giving up <http://www.healthbaby.net/pregnancy/givingup.htm>Alcohol – safe in pregnancy? <http://www.healthbaby.net/pregnancy/health.htm>Avoiding other risks <http://www.healthbaby.net/pregnancy/avoid.htm>Your emotional health <http://www.healthbaby.net/pregnancy/emotional.htm>Changes to your body <http://www.healthbaby.net/pregnancy/changes.htm>More serious problems <http://www.healthbaby.net/pregnancy/moreserious.htm>Working and your health <http://www.healthbaby.net/pregnancy/working.htm>Your rights and benefits <http://www.healthbaby.net/pregnancy/yourrights.htm>**Labour and birth <http://www.healthbaby.net/labourandbirth/index.htm>**Getting ready for labour <http://www.healthbaby.net/labourandbirth/gettingready.htm>Early signs of labour <http://www.healthbaby.net/labourandbirth/earlysigns.htm>The stages of labour <http://www.healthbaby.net/labourandbirth/stagesoflabour.htm>Monitoring your baby in labour <http://www.healthbaby.net/labourandbirth/monitoring.htm>Options for pain relieve in labour <http://www.healthbaby.net/labourandbirth/options.htm>Problems in labour <http://www.healthbaby.net/labourandbirth/problems.htm>Caesarean birth <http://www.healthbaby.net/labourandbirth/caesareanbirth.htm>The first moments after birth <http://www.healthbaby.net/labourandbirth/firstmoment.htm>Twins: pregnancy and birth <http://www.healthbaby.net/labourandbirth/twins.htm>Pre-term birth <http://www.healthbaby.net/labourandbirth/pretermbirth.htm>The loss of your baby before birth <http://www.healthbaby.net/labourandbirth/loss.htm>**You and your baby <http://www.healthbaby.net/youandyourbaby/index.htm>**The changes you can expect <http://www.healthbaby.net/youandyourbaby/changesyou.htm>The postnatal check <http://www.healthbaby.net/youandyourbaby/postnatal.htm>Health professionals to support you <http://www.healthbaby.net/youandyourbaby/healthpro.htm>New friends new support <http://www.healthbaby.net/youandyourbaby/newfriends.htm>Sex and contraception <http://www.healthbaby.net/youandyourbaby/sex.htm>Postnatal depression <http://www.healthbaby.net/youandyourbaby/postnatal2.htm>Returning to work <http://www.healthbaby.net/youandyourbaby/returning.htm>Your baby's first days <http://www.healthbaby.net/youandyourbaby/firstdays.htm>Jaundice and the newborn baby <http://www.healthbaby.net/youandyourbaby/newborn.htm>Breastfeeding your baby <http://www.healthbaby.net/youandyourbaby/breastfeeding.htm>Bottle feeding your baby <http://www.healthbaby.net/youandyourbaby/bottlefeeding.htm>¹ This is not Health Scotland content

Feeding difficulties <http://www.healthbaby.net/youandyourbaby/feedingdifficulties.htm>
Bathing and washing your baby <http://www.healthbaby.net/youandyourbaby/bathing.htm>
Crying <http://www.healthbaby.net/youandyourbaby/crying.htm>
Nappies and changing <http://www.healthbaby.net/youandyourbaby/nappies.htm>
Playing <http://www.healthbaby.net/youandyourbaby/playing.htm>
Sleeping <http://www.healthbaby.net/youandyourbaby/sleeping.htm>
Shopping for your baby <http://www.healthbaby.net/youandyourbaby/shopping.htm>
The baby clinic <http://www.healthbaby.net/youandyourbaby/babyclinic.htm>
Your baby's immunisations <http://www.healthbaby.net/youandyourbaby/immunisations.htm>
Growing and developing <http://www.healthbaby.net/youandyourbaby/growing.htm>
Family foods for your baby <http://www.healthbaby.net/youandyourbaby/family.htm>

Your questions <http://www.healthbaby.net/yourquestions/index.htm>

More information <http://www.healthbaby.net/moreinfo/index.htm>

Ready Steady Baby – the book <http://www.healthbaby.net/moreinfo/thebook.htm>

How to obtain the book <http://www.healthbaby.net/moreinfo/obtain.htm>

Further help and useful addresses <http://www.healthbaby.net/moreinfo/help.cfm>

Abuse <http://www.healthbaby.net/moreinfo/help.cfm@rsb=abuse>

Accident prevention and safety <http://www.healthbaby.net/moreinfo/help.cfm@rsb=accident>

Adoption <http://www.healthbaby.net/moreinfo/help.cfm@rsb=adoption>

Alcohol <http://www.healthbaby.net/moreinfo/help.cfm@rsb=alcohol>

Drugs and smoking <http://www.healthbaby.net/moreinfo/help.cfm@rsb=alcohol>

Behavioural difficulties <http://www.healthbaby.net/moreinfo/help.cfm@rsb=behavioural>

Breastfeeding <http://www.healthbaby.net/moreinfo/help.cfm@rsb=breastfeeding>

Childcare <http://www.healthbaby.net/moreinfo/help.cfm@rsb=childcare>

Disability and illness (general support)

[http://www.healthbaby.net/moreinfo/help.cfm@rsb=disability%20and%20illness%20\(general%20support\)](http://www.healthbaby.net/moreinfo/help.cfm@rsb=disability%20and%20illness%20(general%20support))

Disability and illness (specialised support)

<http://www.healthbaby.net/moreinfo/help.cfm@rsb=specialised>

Family planning <http://www.healthbaby.net/moreinfo/help.cfm@rsb=family>

General support groups

<http://www.healthbaby.net/moreinfo/help.cfm@rsb=general%20support%20groups>

HIV and AIDS <http://www.healthbaby.net/moreinfo/help.cfm@rsb=HIV>

Loss and bereavement <http://www.healthbaby.net/moreinfo/help.cfm@rsb=loss>

Mental health <http://www.healthbaby.net/moreinfo/help.cfm@rsb=mental>

Parent support <http://www.healthbaby.net/moreinfo/help.cfm@rsb=parent>

Pregnancy and maternity services

<http://www.healthbaby.net/moreinfo/help.cfm@rsb=maternity>

Pregnancy problems <http://www.healthbaby.net/moreinfo/help.cfm@rsb=problems>

Rights and benefits <http://www.healthbaby.net/moreinfo/help.cfm@rsb=rights>

Vegetarianism <http://www.healthbaby.net/moreinfo/help.cfm@rsb=vegetarianism>

HEBS Publications http://www.healthbaby.net/moreinfo/hebs_pub.cfm²

² You can only access this page by clicking on the links in the Further Help and Useful addresses section. Once in HEBS Publications, following the links on the page displays a page with content in Chinese and not Health Scotland content.

Healthbaby publications http://www.healthbaby.net/moreinfo/healthbaby_pub.cfm³

³ This page displays content in Chinese and not Health Scotland content.