



15. Mr. Dufurrena, individually and by and through Dos Cats Partners, and HERC together engaged in a joint venture operation for the breeding of champion cutting horses, including Auspicious Cat. In this joint venture, Mr. Dufurrena, Dos Cat Partners, Dr. David Hartman, and HERC sold Auspicious Cat's semen for breeding to mares, for approximately \$1,500.00, including a foaling fee, a breaking fee (for extracting the semen), and a chute fee for shipping Auspicious Cat's semen or breeding on-site at HERC's stallion station in Whitesboro, Texas. Mr. Dufurrena, individually and by and through Dos Cats Partners, Dr. Hartman, and HERC shared in the profits from this operation.

16. Specifically, as Plaintiffs learned during the April 6, 2016, deposition of Dr. David Hartman, Mr. Dufurrena instructed HERC and its employees of the time, place, and location for the extraction of semen from Auspicious Cat for use in artificial insemination. Dr. Hartman and HERC's employees and agents provided instructions and information to Mr.