



BENNY KONG & YEUNG  
SOLICITORS

江炳滔律師事務所

Agents for Patents, Trade Marks and Designs  
專利、商標及外觀設計註冊代理人

知識產權  
管理計劃  
IPMM

DATE: 27<sup>th</sup> May 2011  
OUR REF: 13287-L/BK/B/126-dongsong  
YOUR REF:  
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau  
Direct email: [elsielau@bk.com.hk](mailto:elsielau@bk.com.hk)

香港金鐘夏慤道16號遠東  
金融中心 29樓2901室  
Unit 2901, 29<sup>th</sup> Floor, Far  
East Finance Centre, 16  
Harcourt Road, Admiralty,  
Hong Kong

☎ : +852 2519 3567  
☎ : +852 2519 3610  
(Litigation)  
+852 2519 9758  
(Registration)  
✉ : [enquiry@bk.com.hk](mailto:enquiry@bk.com.hk)  
🌐 : [www.bk.com.hk](http://www.bk.com.hk)

**BY POST BY FAX (86-574-88173896/ 65177778)**

Ninghai Dongsong Electric Factory  
No. 10, Alley 9,  
Zhangshu Yangxia Lane,  
Xidian Town, Ninghai County,  
Ningbo, Zhejiang, China 315613

Attn: 孙迪华 先生/ Mr. Javier Wang

Dear Sir:

**Re: Infringement of Copyright**  
**Respondent: Ninghai Dongsong Electric Factory**

We act for Honwell Products (HK) Limited of Hong Kong.

Our client is the owner of the copyright subsisting in original artistic works in relation to the designs of its popular LED light product named "Wireless Led Task Light" with model no. H-620 ("our client's Product"). Our Client has the right to take legal action to protect the said copyright which is protected under the laws in various countries of the World, including PRC and Hong Kong.

Copy of the photograph featuring our client's Product marked **Annexure A** is enclosed.

Our client is also the registered proprietor of the design of our client's Product registered in the State Intellectual Property Office of the PRC with registration no. ZL 200630010675.0 ("the PRC Registered Design"). Our client has the right to take legal action to protect the PRC Registered Design which is also protected under the laws in PRC.

The PRC Registered Design is applied to our client's Product. The rights and privileges conferred in respect of the PRC Registered Design are valid and subsisting.

.../2

\\Bk-server\data\I-Department\C&D\Letters\13287-L\13287-L(4).doc

-2-

27<sup>th</sup> May 2011  
Ninghai Dongsong Electric Factory

It has come to our client's attention that you are promoting, offering and/or exposing for a LED light product named "Touch light" with model no. LJ01-016 ("the Infringing Product"), which is reproduction or contains substantial reproduction of our client's Product.

In particular, you featured photograph of the Infringing Product at your website at [http://nbchenghui.en.alibaba.com/product/300169004-209982748/Touch\\_light.html](http://nbchenghui.en.alibaba.com/product/300169004-209982748/Touch_light.html)

Copy of the webpage featuring the Infringing Product marked **Annexure B** is enclosed.

By such unauthorized acts in dealing with the Infringing Product, you have infringed our client's copyright. You are demanded to immediately stop all dealings in and with the Infringing Product and to confirm that you will comply with the following:-

1. **Forthwith cease** all offer and/or exposure for sale and/or possession or howsoever any dealings in or with the Infringing Product.
2. You undertake to stop dealing in or with the Infringing Product in the future.
3. You do deliver up to our client all items of Infringing Product, together with any pamphlets, magazines or other advertising media relating thereto.
4. You do disclose, by means of a Statutory Declaration, all of your dealings in or with the Infringing Product, including the name and address of the supplier(s) of the Infringing Product; and exhibiting thereto all purchase documents, receipts and invoices relating to your dealings in or with the Infringing Product.
5. You will pay to our client damages at such amount to be assessed by the court, if not agreed.
6. You will pay to our client costs at such amount to be assessed by the Court, if not agreed.

Our client will also require you to execute a Deed of Undertaking to the above effect.

We trust you will agree to the above terms to avoid unnecessary litigation. If we do not receive your confirmation that you will comply with the above terms **on or before 6<sup>th</sup> June 2011**, our client will appoint PRC attorneys to institute Court proceedings against you without further notice for injunctions, orders for delivery up, disclosure, legal costs and damages to compensate our client's losses.

.../3

-3-

27<sup>th</sup> May 2011  
Ninghai Dongsong Electric Factory

If you have any questions, please contact our Ms. Elsie Lau at (+852) 2519 3567.

如對以上有任何問題，請與本行劉小姐聯絡 (電話 +852-2519-3567)。

Yours faithfully,

BK & Y

Benny Kong & Yeung, Solicitors  
Encl  
JC/el  
c.c. client

# **Annexure A**

**Our client's Product named "Wireless Led Task Light"**

**with model no. H-620**



# **Annexure B**

2<sup>nd</sup> year

# Ninghai Dongsong Electric Factory

- Home
- Products
- TrustPass Profile
- About Us
- Contacts

home products **Camping Light** Touch light

search our products

送中



Touch light...



Touch light...



Touch light...

Ninghai Dongsong Electric Factory

[ Zhejiang, China (Mainland) ]

A&V Checked

## Touch light

Report Suspicious Activit

Add Company to Favorites

Product Showcase [20]

Products [666]

- Stationery [62]
- Car Accessories [38]
- New productions [108]
- Handle magnifier [58]
- LED Bench&Soft clip magnifier [20]
- Helping hand magnifier [6]
- head magnifier [15]
- Hanging magnifier [13]
- Illuminated magnifier [99]
- Krypton flashlight [9]
- Aluminium flashlight [77]
- High power flashlight [50]
- Head Lamp [19]
- Bicycle Light [10]
- Solar Torch [10]
- Touch Light [8]
- Tent Light [30]
- Dynamo flashlight [11]
- Camping Light [3]
- Ungrouped [20]



Touch light

Add to My Favorites

Sample or mini order: [Order now](#) via Buyer Protection

### Product Details:

Place of Origin	Zhejiang, China (Mainland)
Brand Name	Top
Model Number	LJ01-016
Battery Type	3 X AAA
Material	ABS
Certification	CE
Production name	touch light

### Payment & Shipping Terms:

Price:	FOB USD 0.6 / Piece <a href="#">Get Latest Price</a>
Minimum Order Quantity:	1000 Piece/Pieces
Port:	NingBo for Shanghai
Packaging Details:	each In a color box
Delivery Time:	20 days after sample approval
Payment Terms:	L/C,D/A,D/P,T/T,Western Union,MoneyGram
Supply Ability:	5000 Piece/Pieces per Day

Offline



[View Contact Details](#)

« Prev Product

1 2 3

Next Product »

## Detailed Product Description

- 1,CE,ROHS certification
- 2,Color.any color as your choice
- 3,Material.plastic
- 4,Package.white box

- 1,Ultra bright white 5 LED light
- 2,Extra long active time,up to 100hours of light on a single set of batteries
- 3,Easy adhesive for stick on anywhere
- 4,High impact housing

### Company Profile

### Management

### Contact Person



Mr. Javier Wang

[Add to my Contacts](#)

Offline

[View Contact Details](#)

[Language Option](#) ▼