



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: 27th May 2011
OUR REF: 13287-L/BK/B/126-yunda
YOUR REF:
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau
Direct email: elsielau@bk.com.hk

香港金鐘夏慤道16號遠東
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(Registration)
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BY POST BY FAX (86-574-65171708) BY EMAIL (yunda.dianqi@126.com)

Ninghai Xidian Yunda Rubber & Electric Factory
No. 118, Zhangshu Middle Road,
Xidian Town, Ningbo,
Zhejiang, China 315613

Attn: Ms. Zifang Wang/ Mr. Jiantan Sun

Dear Sir:

Re: Infringement of Copyright
Respondent: Ninghai Xidian Yunda Rubber & 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.

It has come to our client's attention that you are promoting, offering and/or exposing for a LED light product named "YD-205D push light" with model no. YD-205D and "5 led push light" with model no. YD-205 ("the Infringing Products"), which are reproductions or contain substantial reproduction of our client's Product.

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27th May 2011
Ninghai Xidian Yunda Rubber & Electric Factory

In particular, you featured photograph of the Infringing Products at your websites, as per the hyperlinks listed below, as follows:-

1. http://yundaxiangsu.en.alibaba.com/product/282560930-209734236/YD_205D_push_light.html; and
2. http://yundaxiangsu.en.alibaba.com/product/283850652-209734236/5_led_push_light.html

Copies of the webpages featuring the Infringing Products marked **Annexure B** are enclosed.

By such unauthorized acts in dealing with the Infringing Products, you have infringed our client's copyright. You are demanded to immediately stop all dealings in and with the Infringing Products 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 Products.
2. You undertake to stop dealing in or with the Infringing Products in the future.
3. You do deliver up to our client all items of Infringing Products, 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 Products, including the name and address of the supplier(s) of the Infringing Products; and exhibiting thereto all purchase documents, receipts and invoices relating to your dealings in or with the Infringing Products.
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.

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27th May 2011
Ninghai Xidian Yunda Rubber & Electric Factory

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 6th 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.

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,



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

2nd year



Ninghai Xidian Yunda Rubber & Electric Factory

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cupboard light

YD-205D push light

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3 led touch light...



1 LED cupboard light(YD-201-



5 led push light...



YD-205D push light...



4 LED push light...



YD-203b push light...



4 LED push light...

Ninghai Xidian Yunda Rubber & Electric Factory
[Zhejiang, China (Mainland)]

A&V Checked

Add Company to Favorites

Product Showcase [10]

Products [500]

LED HEAD TORCH [20]

YD-6 Headlamp [23]

YD-8 headlamp [63]

YD-9 LED Headlamp [32]

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Company Profile

company location

CERTIFICATIONS

Contact Person



Mr. Jiantan Sun

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View Contact Details

YD-205D push light



YD-205D push light

Add to My Favorites

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

via

Buyer Protection

Product Details:

Place of Origin	Zhejiang, China (Mainland)
Brand Name	yunda
Model Number	YD-205D
Light Source	LED
Certificate Standard	CE
Usage	Decoration
Power Generation	Switch
Color	gray
Material	ABS
Power Source	Battery
certification	ROHS

Payment & Shipping Terms:

Price:	Get Latest Price
Minimum Order Quantity:	3000 Piece/Pieces
Port:	Ningbo
Packaging Details:	double blister
Payment Terms:	L/C,T/T,Western Union
Supply Ability:	5000 Piece/Pieces per Day

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Detailed Product Description

push light
model: YD-203D
brand new super bright LED touch light
easy to take and used in wardrobes, cupboards, sheds

push light
model: YD-205D
LED number: 5 LED
body size: 8.8*4.5 cm
LED brightness: 13000-15000 mod
battery: 3*AAA (battery not included)
packing: double blister
Fnctions: 50%--100%--off

1. with its round design, you get light in all directions
2. ideal for use in wardrobes, cupboards, sheds and cabinets
3. it comes with peel paper backing, so you can easily adhere it wherever light is needed
4. the life of LED is more than 100, 000 hours
5. continuous use for 30 hours.
6. lights are powered with a press of you finger on the surface.

Language Option



Ninghai Xidian Yunda Rubber & Electric Factory

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- Products
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home products cupboard light 5 led push light

search our products 送册



Ninghai Xidian Yunda Rubber & Electric Factory
[Zhejiang, China (Mainland)]

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- LED aluminum flashlights [19]
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- tent light [42]
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Company Profile

company location

CERTIFICATIONS

Contact Person

Mr. Jiantan Sun
Add to my Contacts

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View Contact Details

5 led push light



5 led push light

Add to My Favorites

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

Product Details:

Place of Origin: Zhejiang, China (Mainland)
Brand Name: yunda
Model Number: YD-205
color: silver, red, blue...

Payment & Shipping Terms:

Price: FOB USD 0.7~1.2 / Piece
[Get Latest Price](#)
Minimum Order Quantity: 3000 Piece/Pieces
Port: Ningbo
Packaging Details: clam shell
Delivery Time: 15 days
Payment Terms: L/C,T/T,Western Union,MoneyGram
Supply Ability: 5000 Piece/Pieces per Day

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« Prev Product 1 2 3 4 5 6 7 ... Next Product »

Detailed Product Description

5 led push light
super bright LED touch light
easy to carry about and used in wardrobes, cupboards, sheds

5 led push light

Item No.: YD-205, 5 LED light
BATTERY: 3*AAA(not included)
PACKING: double blister card
MATERIAL: ABS
SPECIFICATION: 8.8*4.5 cm
OPERATION: 50%-100%-OFF

1. battery operated, no wires or installation requires
2. with self-adhesive sticker on the backside, can be stucked to wood, plastic, metal, glass, etc.
3. perfect for closets, sheds, storeroom, cabinets, stairway, etc.