



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-tongzhou
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
金融中心 29樓2901室
Unit 2901, 29th 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
🌐 : www.bk.com.hk

BY POST BY FAX (86-574-27895161) BY EMAIL (sales@tradetz.net)

Ningbo Tongzhou International Trading Co., Ltd.
Room 515, Building 1,
Eastern Business Centre,
Jiangdong District, Ningbo,
Zhejiang, China 315000

Attn: Mr. Allan Wang

Dear Sir:

Re: Infringement of Copyright

Respondent: Ningbo Tongzhou International Trading Co., Ltd.

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-

27th May 2011
Ningbo Tongzhou International Trading Co., Ltd.

It has come to our client's attention that you are promoting, offering and/or exposing for a LED light product named "Touch Light, Push Light, Stick N Click Light" with model no. TZT-1008 and "Wall Light" with model nos. TZT-1008 and TZT-1009 ("the Infringing Products"), which are reproductions or contain substantial reproduction of our client's Product.

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

1. http://tongzhou.en.alibaba.com/product/215512930-205902033/Touch_Light_Push_Light_Stick_N_Click_Light.html;
2. http://www.tradetz.cn/product_view.asp?id=1995; and
3. http://www.tradetz.net/product_view.asp?id=1995

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.

.../3

-3-

27th May 2011
Ningbo Tongzhou International Trading Co., Ltd.

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 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,

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

3rd year



Ningbo Tongzhou International Trading Co., Ltd.

Home

Products

TrustPass Profile

About Us

Contacts

search our products

送

Ningbo Tongzhou International Trading Co., Ltd.
[Zhejiang, China (Mainland)]

A&V Checked

Add Company to Favorites

Product Showcase [35]

Products [670]

- 1W-3W LED flashlight [54]
- Aluminum LED Flashlight [93]
- Solar Flashlight [3]
- Rechargeable LED flashlight [47]
- Penlight [36]
- Keychain Light [55]
- Book light [33]
- Dynamo Flashlight [42]
- Bicycle Light [20]
- Headlamp [17]
- Camping Lantern [40]
- LED Candle Light [19]
- Plastic LED flashlight [9]
- Touch Lamp [15]
- Solar Lawn Light [12]
- Compact Fluorescent Lamps [4]
- USB Light [9]
- Compass [13]
- Bottle opener [20]
- optical telescope [9]

Ungrouped [20]

Company Profile

Certificate

Contact Person

Mr. allan wang
Add to my Contacts

Offline

View Contact Details

home products Touch Lamp Touch Light,Push Light,Stick N Click Light



Touch Light,Push Light,Stick N Click Light

Report Suspicious Activity



Touch Light,Push Light,Stick N Click Light

Add to My Favorites

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

Product Details:

Place of Origin	Zhejiang, China (Mainland)
Model Number	TZT-1008
Light Source	LED
Certificate Standard	CE
Usage	Room
Power Generation	Switch
Material	ABS
Power Source	Battery
touch light	touch light

Payment & Shipping Terms:

Price:	FOB USD 0.5-1.0 Get Latest Price
Minimum Order Quantity:	1000 Piece/Pieces
Port:	ningbo
Packaging Details:	box packing or blister
Delivery Time:	decide by order quantity
Payment Terms:	L/C,T/T
Supply Ability:	300000 Piece/Pieces per Month

Offline

View Contact Details

« Prev Product

1 2 3 4 5 6 7 ...

Next Product »

Detailed Product Description

Touch Light,Push Light,Stick N Click Light

Touch Light,Push Light,Stick N Click Light

5LED

Model:TZT-1008

Packing each pc per blister card

We can supply LED Torch Light,LED Light,Stick Light,Push Light,Shaking Light,Flashlight,Bicycle Lamp,Night Light,Solar Light,Solar Lamp,Garde Light,Spot Light,Halogen Working Light,Camping Light,Headlamp,Dynamo Torch,Touch Light,Desk Light,Camping Lantern,Magic Light,Plasma Light,Kerosene Light,EVA lamp,Deck Lantern,Socket Light,LED Umbrella Light,Remote Control Tent Lamp,LED Caution Light, Handy Bulb Light etc.

Language Option



About us



Products



Pdf Catalogue



Online Message



Contact us



Back Home

Products

- LED Flashlight
- Dynamo Flashlight
- Pen Light
- LED Keychain Light
- Solar Products
- Camping Light
- Head Light
- Bicycle Light
- Promotional Products
- Digital Timer



Products

Wall Light--TZT-1008



Products Name	Wall Light
Item No.	TZT-1009
Material	ABS,PS
Size	9*9*5 cm
Packing	white box
LED	5 LED

led flashlight keychain led flashlight pen led flashlight plastic led flashlight rubber flashlight aluminum led flashlight led light bulb book led light dynamo flashlight emergency led flashlight head led light and camping led lantern dynamo led flashlight emergency flashlight



Add Room 515, Building 1, Eastern Business Center, Jiangdong District, Ningbo, China
 Tel. 0086-574-27895155 27895165 27895168
 Fax. 0086-574-27895161
 Email sales@tradetz.net



About us



Products



Pdf Catalogue



Online Message



Contact us



Back Home

Products

- LED Flashlight
- Dynamo Flashlight
- Pen Light
- LED Keychain Light
- Solar Products
- Camping Light
- Head Light
- Bicycle Light
- Promotional Products
- Digital Timer

Online Message



Products

Wall Light--TZT-1008



Products Name	Wall Light
Item No.	TZT-1009
Material	ABS,PS
Size	9*9*5 cm
Packing	white box
LED	5 LED

led flashlight keychain led flashlight pen led flashlight plastic led flashlight rubber flashlight aluminium led flashlight led light bulb book led light dynamo flashlight emergency led flashlight head led light and camping led lantern dynamo led flashlight emergency flashlight



Add Room 515, Building 1, Eastern Business Center, Jiangdong District, Ningbo, China
Tel: 0086-574-27895155 27895165 27895168
Fax: 0086-574-27895161

Email: sales@tradetz.net

