



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: 21st May 2009
OUR REF: 13287-L/BK/B/126-times
YOUR REF:
REPLY TO: Mr. Edmond Yeung/ Ms. Katherine Law
Direct email: katherinelaw@bk.com.hk

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BYPOST BY FAX (86-574-8725-1768)

Ningbo Times Int'l Trading Co., Ltd.
Room 1011-1016, 10th Floor
QilinNorth Building
No. 1501 Tiantong North Road
Yinzhou, Ningbo, Zhejiang Province
China 315040

Attn.: Ms. Ning Li

Dear Sir,

Re: Infringement of Copyright
Respondent: Ningbo Times Int'l 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 design of its popular led light product named "Wireless LED Under Cabinet Light" with model nos. H-600 ("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 the PRC and Hong Kong.

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

Our client is also the registered proprietor of the designs of our client's Product registered in the Hong Kong Registered Designs Registry with registration no. 060075.4 ("the Hong Kong Registered Design"). Our client also has the right to take legal action to protect the Hong Kong Registered Design which is also protected under the laws in Hong Kong.

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

.../2

-2-

21st May 2009
Ningbo Times Int'l Trading Co., Ltd.

It has come to our client's attention that you have been promoting, offering and/or exposing for sale led light product named "Wireless LED Picture Light(E-0044)" with model no. E-0044 ("Infringing Product"), which is reproduction or contains substantial reproductions of our client's Product.

In particular, you featured photograph of the Infringing Product at your website at http://timeschina.en.alibaba.com/product/223055713-200125406/Wireless_LED_Picture_Light_E_0044_.html.

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

By such unauthorised acts in dealing with the Infringing Product, you have infringed our client's copyright and registered design rights. 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 possession or howsoever 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 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 dealing in or with the Infringing Product.

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-3-

21st May 2009
Ningbo Times Int'l Trading Co., Ltd.

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.

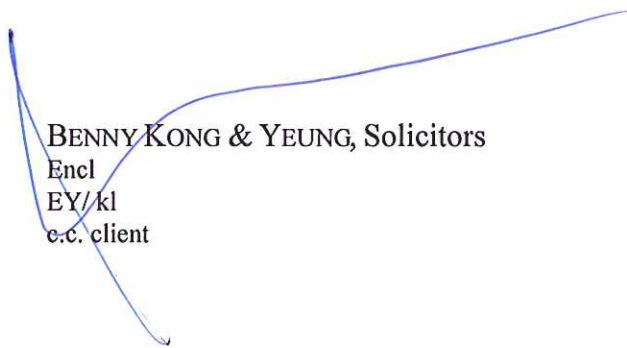
Our client will also require you to execute a Deed of Undertaking to the above effect.

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 31st May 2009**, 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. Katherine Law at (+852) 2519 3567.

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

Yours faithfully,



BENNY KONG & YEUNG, Solicitors
Encl
EY/kl
e.c. client

Annexure A

Our client's Product named "Wireless LED Under Cabinet

Light" with model no. H-600



Annexure B

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注册/发布

2nd year

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NINGBO TIMES Ningbo Times Int'l Trading Co., Ltd.

search our products

home products LED light Wireless LED Picture Light(E-0044)

Product Showcase [29]



Products

- Lounge Chair [21]
- Foot care [25]
- as seen on TV [234]
- Camping Lantern [70]
- LED light [253]
- Flashlight [66]
- memory foam [45]
- person care [33]
- Light [55]
- HARDWARE [7]
- JUMP START [19]

Company Profile

Video Intro

Company Info

Ningbo Times Int'l Trading Co., Ltd.
 [China] [Verified Member]
 Online Postings: Products [848], Selling Leads [1024]

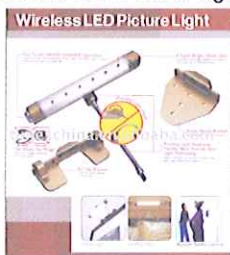
Business Type: Manufacturer, Trading Company

City: Ningbo
 Province/State: Zhejiang
 Country/Region: China

Offline

View Contact Details

Wireless LED Picture Light(E-0044)



E-0044 Wireless LED Picture Light(E-0044)

Product Details:

Place of Origin: Zhejiang China

Model Number: E-0044

Payment & Shipping Terms:

Minimum Order Quantity: 3000 Piece/Pieces

Payment Terms: L/C, T/T

Offline

View Contact Details

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

Detailed Product Description

Wireless LED Picture Light(E-0044)
 Picture light
 Reading light
 Museum Quality Lighting

Language Option

Wireless LED Picture Light

One Touch ON/OFF/DIMMER Operation
 Press once for full brightness. Press again for softer light. Press a third time to turn the light off.

6 Super Bright White LEDs
 Provide bright light where you need it. LED's last up to 100,000 hours.

Pivoting Light Head

EZ Clip Bracket
 Clips to most frames in seconds.

Screw Mount Bracket
 Screws to most frames.

No Wires, No Plugs!
 Runs on 3 AAA batteries (not included).

Pivoting Light Head and Flexible Neck Provide Ideal Light Positioning
 Neck is flexible so you can position the light right where you want it.

Picture Light Reading Light Museum Quality Lighting

E-0044

Wireless LED Picture Light(E-0044)