



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: 19<sup>th</sup> June 2009  
OUR REF: 13287-L/BK/B/126-yiwu  
YOUR REF:  
REPLY TO: Mr. Edmond Yeung/ Ms. Katherine Law  
Direct email: [katherinelaw@bk.com.hk](mailto:katherinelaw@bk.com.hk)

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**BY POST BY FAX (086-579-85187931)**

Yiwu Jianuo Electronics Firm  
No.17931, G Area  
Yiwu Internatinal Trade City  
Yiwu, Zhejiang  
China 322000

Attn.: Mr. Naiyou Miao

Dear Sir:

**Re: Infringement of Copyright**  
**Respondent: Yiwu Jianuo Electronics Firm**

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 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.

A 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 Hong Kong Registered Designs Registry with registration no. 0802486.9M015 ("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 Hong Kong Registered Design is valid and subsisting.

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19<sup>th</sup> June 2009  
Yiwu Jianuo Electronics Firm

It came to our client's attention that you are promoting, offering and/or exposing for LED light product named "LED touch light" with model no. JYHJ-007 ("the Infringing Product"), which is a reproduction or contains substantial reproductions of our client's Product.

In particular, you featured photographs of the Infringing Product at your website at [http://jianuo.en.alibaba.com/product/226633233-200689220/LED\\_touch\\_light.html](http://jianuo.en.alibaba.com/product/226633233-200689220/LED_touch_light.html)

A 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 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:-

7. **Forthwith cease** all offer and/or exposure for sale and/or possession or howsoever any dealings in or with the Infringing Product.
8. You undertake to stop dealing in or with the Infringing Product in the future.
9. You do deliver up to our client all items of Infringing Product, together with any pamphlets, magazines or other advertising media relating thereto.
10. 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.

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19<sup>th</sup> June 2009  
Yiwu Jianuo Electronics Firm

11. You will pay to our client damages at such amount to be assessed by the court, if not agreed.
12. You will pay to our client costs at such amount to be assessed by the Court, if not agreed.

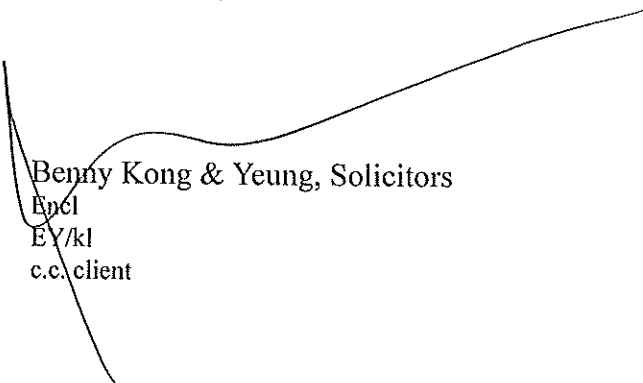
Our client will also require you to execute a Deed of Undertaking to the above effect.

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 29<sup>th</sup> June 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) 25193567.

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

c.c. client

# **Annexure A**

**Our client's Product named "Wireless LED Task Light"**  
**with model no. H-620**



# **Annexure B**

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Search Product

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1<sup>st</sup> year

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### Yiwu Jianuo Electronics Firm

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home products Household Products LED touch light

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Massage & Sauna Products [76]

Pet series [9]

Company Profile

Company Info

Yiwu Jianuo Electronics Firm

[China]

[Verified Member]

Online Postings: Products [268], Selling Leads [325]

Business Type: Manufacturer, Trading Company

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

Offline

View Contact Details



Car Clothes rack & safety



Buzz-Zapper...



Bath Massage Brush...



vegetable slicer...



Health Master 100...



LED touch light...



electric knife...

### LED touch light



LED touch light

Product Details:

Keywords: LED touch light  
Model Number: JYHJ-007

Payment & Shipping Terms:

Minimum Order Quantity: 1000 Piece/Pieces  
Packaging Details: Color Box  
Delivery Time: 25 days  
Payment Terms: T/T, Western Union  
Supply Ability: 100,000 Piece/Pieces per Month

Offline

View Contact Details

« Prev Product ... 36 37 38 39 40 41 42 ... Next Product »

### Detailed Product Description

LED touch light

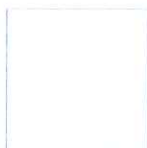
This product use 3 pcs with 1.5v battery, 5pcs of LED. When you press the button in the middle, the 5pcs LEDs will be lighting. Optimal colors for exterior case: white and black. It's easy to stick it everywhere with its EVA glue.

Language Option



LED touch light

### Send your message to this supplier



Mr. Roy Zhang

Offline

Enter your message here and then click Send

Enter between 20 to 3,000 characters, English only.

Send