



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: 29th June 2009
OUR REF: 13287-L/BK/B/126-zobon
YOUR REF:
REPLY TO: Ms. Jennifer Chong/ Ms. Katherine Law
Direct email: katherinelaw@bk.com.hk

香港灣仔告士打道
88號19樓

19/F, 88 Gloucester Road,
Wanchai, Hong Kong

☎ : +852 2519 3567
☎ : +852 2519 3610
✉ : enquiry@bk.com.hk
🌐 : www.bk.com.hk

BY POST BY FAX (86-574-2771-5870) BY EMAIL (ivan@zobon.net)

Ningbo Zobon International Trading Co., Ltd.
Unit 2312-2314
No. 1 XinTianDi Building East Area
1018 MingAn Road
Ningbo City, Zhejiang Province
China 315016

Attn.: Ms. Joyce Hong

Dear Sir:

Re: Infringement of Copyright
Respondent: Ningbo Zobon 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 products named "Wireless LED Wall Light" with model no. H-696 and "Wireless LED Under Cabinet Light" with model no. H-640 ("our client's Products"). 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.

Copies of the photographs featuring our client's Products marked **Annexure A** are enclosed.

Our client is also the registered proprietor of the designs of our client's Products registered in the Hong Kong Registered Designs Registry with registration nos. 0702443.7, 061379.9 and 0702438.7 ("the Hong Kong Registered Designs"). Our client also has the right to take legal action to protect the Hong Kong Registered Designs which is also protected under the laws in Hong Kong.

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

.../2

-2-

29th June 2009
Ningbo Zobon International Trading Co., Ltd.

It came to our client's attention that you are promoting, offering and/or exposing for LED light products named "LED lighting" and "LED Light" ("the Infringing Products"), which are reproduction or contain substantial reproductions of our client's Product.

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

1. http://zobon.en.alibaba.com/product/232147669-50087691/LED_lighting.html; and
2. http://zobon.en.alibaba.com/product/231401965-50087691/LED_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.

.../3

-3-

29th June 2009
Ningbo Zobon International 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.

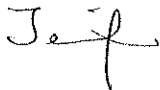
Our client will also require you to execute a Deed of Undertaking to the above effect.

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 8th August 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
JC/kl
c.c. client

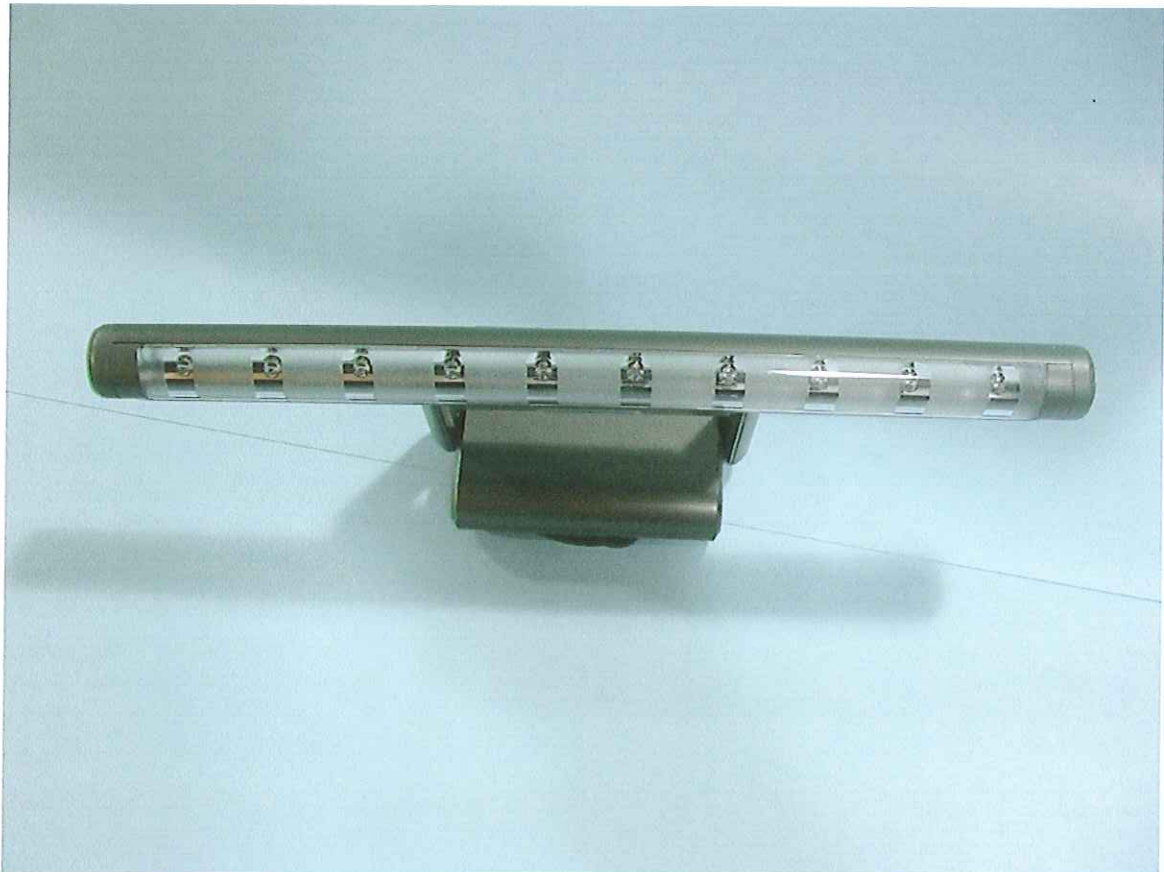
Annexure A

Our client's Product named "Wireless LED Under Cabinet

Light" with model no. H-640



Our client's Product named "Wireless LED Wall Light" with
model no. H-696



Annexure B

5th year

Ningbo Zobon International Trading Co., Ltd.

search our products

送

Home **Products** Selling Leads TrustPass Profile About Us Contacts

Product Showcase [30]

Products

- Garden [3]
- toaster [7]
- TV item [31]
- Pet item [8]
- Handbag [11]
- Solar light [12]
- Person care [5]
- Kitchenware [36]
- Housewares [59]
- Steamer item [15]
- Promotion gift [16]
- Electrical Appliance [43]
- Flashlights & Torchs [110]
- Others [4]

Company Profile

Company Info

Ningbo Zobon International Trading Co., Ltd.
[\[China\]](#)
 [Verified Member]

Online Postings: [Products \[360\]](#),
[Selling Leads \[411\]](#)

Business Type: Manufacturer

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

Offline

[View Contact Details](#)

home products Flashlights & Torchs **LED Light**



LED Light...



solar sensor light...



Colourful LED Lamp...



Hand-cranked mobile



DYNAMO FLASHLIGHT...



LED Light...



LED Light...

LED Light



zobon.en.alibaba.com

LED Light

Product Details:

Place of Origin: Zhejiang China

Payment & Shipping Terms:

Minimum Order Quantity: 3000 Piece/Pieces

Offline

[View Contact Details](#)

« Prev Product

... 8 9 10 11 12 13 14 ...

Next Product »

Detailed Product Description

LED Light

- 1)10 leds,11,000-13,000MCD
- 2)battery:3*1.5V AA(not included)
- 3)you can adjust any angle in a direction
- 4)Material:ABS
- 5)you can hang or stick it on wall
- 6)two step brightness

Language Option ▾



zobon.en.alibaba.com

LED Light

Send your message to this supplier

Enter your message here and then click Send

[Message input box]

Ms. fengjing725 feng



Offline

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

Send

« Prev Product

... 8 9 10 11 12 13 14 ...

Next Product »

Other Products from this Supplier

5th year

Ningbo Zobon International Trading Co., Ltd.

search our products

送中

Home **Products** Selling Leads TrustPass Profile About Us Contacts

Product Showcase [30]

Products

- Garden [3]
- toaster [7]
- TV item [31]
- Pet item [8]
- Handbag [11]
- Solar light [12]
- Person care [5]
- Kitchenware [36]
- Housewares [59]
- Steamer item [15]
- Promotion gift [16]
- Electrical Appliance [43]
- Flashlights & Torchs [110]
- Others [4]

home products Flashlights & Torchs **LED lighting**



LED lighting



LED lighting

Product Details:

Place of Origin Zhejiang China

Payment & Shipping Terms:

Minimum Order Quantity: 3000 Piece/Pieces

Offline

[View Contact Details](#)

Company Profile

Company Info

Ningbo Zobon International Trading Co., Ltd.
[China]
[Verified Member]

Online Postings: [Products](#) [360],
[Selling Leads](#) [411]

Business Type: Manufacturer

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

[Offline](#)

[View Contact Details](#)

[« Prev Product](#)

1 2 3 4 5 6 7 ...

[Next Product »](#)

Detailed Product Description

LED lighting

- 1)6 LEDs;
- 2)Powered by:3*1.5V AAA(not included)
- 3) working mode:two step brightness
- 4)Adjustable light head;
- 5)Can hang or stick on the wall;
- 6)Material:ABS.

[Language Option](#)



LED lighting