



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: 30<sup>th</sup> April 2010  
OUR REF: 13287-L/BK/B/126-chifun  
YOUR REF:  
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau  
Direct e-mail: [elsielau@bk.com.hk](mailto: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, 29<sup>th</sup> Floor, Far  
East Finance Centre, 16  
Harcourt Road, Admiralty,  
Hong Kong

**BY HAND**

Ningbo Chi-Fun Industry Co., Ltd.  
Booth No.: 3GJ42  
Hong Kong Gifts & Premium Fair 2010,  
Hong Kong Convention and Exhibition Centre,  
Wanchai, Hong Kong.

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(Litigation)  
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(Registration)  
✉ : [enquiry@bk.com.hk](mailto:enquiry@bk.com.hk)  
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Dear Sirs,

**Re: Infringement of Copyright**  
**Respondent: Ningbo Chi-Fun Industry Co., Ltd.**

We act for Honwell Products (HK) Limited.

Our client is the owner of the copyright subsisting in original artistic works in relation to the design of its popular led light products named "Wireless LED Spotlight" with model nos. H740, "Wireless LED Track Lighting" with model no. H703, "Wireless LED Under Cabinet Light" with model no. H700 and "Wireless Led Book/Clip Light" with model no. H-795XL ("our client's LED 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 Hong Kong and PRC.

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

It has come to our client's attention that you have been promoting, offering for sale, distributing and/or exposing for sale led light products named "LED Book Light" with model no. CFR 005 and "LED Plastic Light series" with model nos. CFP-001, CFP-003 and CFP-004 ("the Infringing Products"), which are reproductions or contain substantial reproductions of our client's Products.

A copy of the catalogue featuring the Infringing Products marked **Annexure B** is enclosed

In particular, you featured, offered and/or exposed for sale and sale of the Infringing Products at booth no. 3GJ42 at the Hong Kong Gifts & Premium Fair 2010 at Hong Kong Convention and Exhibition Centre.

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30<sup>th</sup> April 2010  
Ningbo Chi-Fun Industry Co., Ltd.

By such unauthorised 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.

You are requested to cease all offer and/or exposure for sale and/or possession or purchase or howsoever dealings in or with the Infringing Products **forthwith** or our client will 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/llk

c.c. (1) client

(2) Ningbo Chi-Fun Industry Co., Ltd. [BY FAX (86-574-87905884)]

BY EMAIL ([sunlightocp@gmail.com](mailto:sunlightocp@gmail.com))

## **Annexure A**

### **Our client's Products**



**“Wireless LED Track Lighting”  
with model no. H-703**



**“Wireless LED Spotlight”  
with model no. H-740**



**“WIRELESS LED UNDER  
CABINET LIGHT” with  
model no. H-700**



**“WIRELESS LED BOOK/  
CLIP LIGHT” with model  
no. H-795XL**

# **Annexure B**

**The Infringing Products named**  
**“LED Book Light” with model no.**  
**CFR005, “LED Plastic Light**  
**series”with model nos. CFP-001,**  
**CFP-003 and CFP-004**

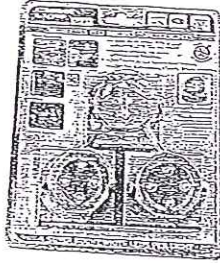
# **Annexure B**

**The Infringing Products named**  
**“LED Book Light” with model no.**  
**CFR005, “LED Plastic Light**  
**series”with model nos. CFP-001,**  
**CFP-003 and CFP-004**

# PLASTIC LIGHT

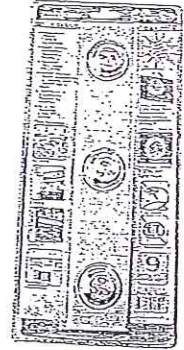
## CFP-001

3 Set Of Closet Light  
 Light Source: 4 LED each  
 Power: AAA battery x3 each  
 Multi-Directional Light Head



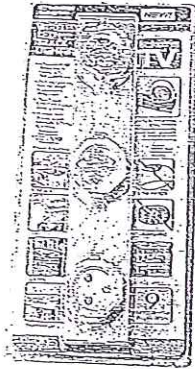
## CFP-002

Wireless Led under Cabinet Light  
 Light source: 9 LED  
 Power: AAA battery x6  
 Light Heads Pivot independently



## CFP-003

Wireless Led Track Lighting  
 Light source: 9 LED  
 Power: AAA battery x6  
 Multi-Directional Light Heads



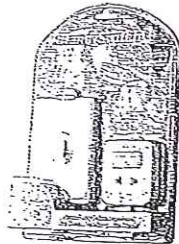
## CFP-004

Wireless Led under Cabinet Light  
 Light source: 12 LED  
 Power: AAA battery x6



## CFP-005

Handy Switch  
 Works up to 60 feet  
 Just peel & press, then put the lamp  
 into the remote receiver



## CFP-006

LED Colour Display Flashlight  
 Power: AAA battery x3



## CFP-007

LED Plastic Flashlight  
 Power: AAA battery x3  
 Light source: 4 LED(head) + 1 LED(tail)



## CFP-008

LED Plastic Flashlight with stand  
 Power: AAA battery x3  
 Light source: 3 LED

