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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: 15<sup>th</sup> March 2011  
OUR REF: 13287-L/BK/B/126-haiwang  
YOUR REF:  
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau  
Direct email: [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

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☎ : +852 2519 3610  
(Litigation)  
+852 2519 9758  
(Registration)  
✉ : [enquiry@bk.com.hk](mailto:enquiry@bk.com.hk)  
🌐 : [www.bk.com.hk](http://www.bk.com.hk)

**BY POST BY FAX (86-755-82867870) BY EMAIL ([web@szhaiwang.com](mailto:web@szhaiwang.com))**

Shenzhen Haiwang Sensor Co., Ltd.  
Room 1004, Zhongyang Xigu Building,  
The intersection of Binhe Road and  
Sha Tsui Road, Futian District,  
Shenzhen, Guangdong,  
China 518048

Attn: Ms. Leesy Beata

Dear Sir:

**Re: Infringement of Copyright**  
**Respondent: Shenzhen Haiwang Sensor 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 magnifier product named "3X / 5X LED Magnifier" with model no. H-679 ("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 and the State Intellectual Property Office of the PRC with registration nos. 0901496.0M021 and ZL200930211133.3 ("the Hong Kong and PRC Registered Designs"). Our client has the right to take legal action to protect the Hong Kong and PRC Registered Designs which are also protected under the laws in Hong Kong and the PRC.

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 are valid and subsisting.

.../2

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15<sup>th</sup> March 2011  
Shenzhen Haiwang Sensor Co., Ltd.

It has come to our client's attention that you are promoting, offering and/or exposing for a magnifier products named "LED card magnifier" and "Good Quality + Cheap Price PVC material LED Magnifier" with model no. CM-98LED ("the Infringing Product"), which is a reproduction or contains 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://www.alibaba.com/product-gs/332908366/Good\\_Quality\\_Cheap\\_Price\\_PVC\\_material.html](http://www.alibaba.com/product-gs/332908366/Good_Quality_Cheap_Price_PVC_material.html);
2. [http://www.alibaba.com/product-gs/308341177/LED\\_card\\_magnifier.html](http://www.alibaba.com/product-gs/308341177/LED_card_magnifier.html);
3. [http://szhaiwang.en.alibaba.com/product/332908366-200808423/Good\\_Quality\\_Cheap\\_Price\\_PVC\\_material\\_LED\\_Magnifier.html](http://szhaiwang.en.alibaba.com/product/332908366-200808423/Good_Quality_Cheap_Price_PVC_material_LED_Magnifier.html); and
4. [http://szhaiwang.en.alibaba.com/product/308341177-200808423/LED\\_card\\_magnifier.html](http://szhaiwang.en.alibaba.com/product/308341177-200808423/LED_card_magnifier.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.
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.

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15<sup>th</sup> March 2011  
Shenzhen Haiwang Sensor 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 25<sup>th</sup> March 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,



Benny Kong & Yeung, Solicitors  
Encl  
JC/el  
c.c. client

# Annexure A

Our client's Product named "3X / 5X LED Magnifier" with

model no. H-679



# **Annexure B**

2<sup>nd</sup> year



Shenzhen Haiwang Sensor Co.,Ltd.

- Home
- Products
- TrustPass Profile
- About Us
- Contacts

home products Card Magnifier LED card magnifier

- promotion toy binoculars...
- promotion toy binoculars...
- mini paper binoculars...
- mini paper binoculars...
- mini paper binoculars...
- promotion paper folding
- promotion paper folding

search our products

Shenzhen Haiwang Sensor Co.,Ltd  
[ Guangdong, China (Mainland) ]

A&V Checked

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Products [1536]

Small Appliance [41]

Ultrasonic Repeller [73]

Solar Lamp & Bags [48]

Hot !!! 3G Video camera [91]

Mini DV & Camera [69]

Security Series [122]

MP3 hunting bird player [157]

Unique Item of PIR Led Lamp [12]

PIR Lens & Sensor & IC [201]

Card Magnifier [227]

Fresnel lens [159]

LED lens [219]

LDR,CDS & Light Sensor [97]

Thermistor / NTC & PTC [17]

Air Freshener [3]

Company Profile

Agents Wanted

R&D

Management

Quality Control

Contact Person



Ms. Leesy Beala

Add to my Contacts

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## LED card magnifier



LED card magnifier

Add to My Favorites

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

via Buyer Protection

### Product Details:

Place of Origin	Guangdong, China (Mainland)
Brand Name	HW
Material	ABS PVC
Magnification	3X,4X,5X
Item	LED card magnifier
Packing	OPP,PVC,PE

### Payment & Shipping Terms:

Price:	<a href="#">Get Latest Price</a>
Minimum Order Quantity:	3000 Piece/Pieces
Port:	SZ
Delivery Time:	15days
Payment Terms:	T/T,Western Union,credit card & paypal

I'm Away

View Contact Details

« Prev Product

1 2 3 4 5 6 7 ...

Next Product »

### Detailed Product Description

- 1 LED card magnifier
- 2 More than 10 years produced experience.
- 3 Reasonable price with best service.

## LED card magnifier

Image :

2<sup>nd</sup> year



Shenzhen Haiwang Sensor Co.,Ltd.

- Home
- Products
- TrustPass Profile
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- Contacts

home products Card Magnifier **Good Quality+Cheap Price PVC material LED Magnifier**

- promotion toy binoculars...
- promotion toy binoculars...
- mini paper binoculars...
- mini paper binoculars...
- mini paper binoculars...
- promotion paper folding
- promotion paper folding

search our products

Shenzhen Haiwang Sensor Co.,Ltd  
[ Guangdong, China (Mainland) ]

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Add Company to Favorites

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Company Profile

Agents Wanted

R&D

Management

Quality Control

Contact Person

Ms. CiCi Obama  
Add to my Contacts

I'm Away

View Contact Details

Good Quality+Cheap Price PVC material LED Magnifier



Good Quality+Cheap Price PVC material LED Magnifier

Add to My Favorites

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

via Buyer Protection

Product Details:

Material	pvc
Technique	Printed
Style	Antique Imitation
Use	Magnifying
Theme	Angel
Regional Feature	China
Place of Origin	Guangdong, China (Mainland)
Brand Name	HW
Model Number	CM-98LED
Character	with LED

Payment & Shipping Terms:

Price:	FOB USD 0-0.22 / Piece <a href="#">Get Latest Price</a>
Minimum Order Quantity:	3000 Piece/Pieces
Port:	Shenzhen
Packaging Details:	Size:98*60*6MM
Delivery Time:	about one week
Payment Terms:	T/T,Western Union,Paypal
Supply Ability:	500000 Piece/Pieces per Quarter

I'm Away

[View Contact Details](#)

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

Detailed Product Description

- 1.easy to carry
- 2.a kind of promotional item
- 3.the cheapest price
- 4.excellent quality

Good Quality+Cheap Price PVC material LED Magnifier

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LED magnifier

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[Language Options](#)



See larger image: LED card magnifier

[Add to My Favorites](#)

### LED card magnifier

FOB Price: [Get Latest Price](#)

Port: SZ

Minimum Order Quantity: 3000 Piece/Pieces

Payment Terms: T/T,Western Union,credit card & paypal

Sample or Mini-Order: [Order now](#) via

Ms. Leesy Beata

[I'm Online](#)  
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[Contact Supplier](#)

Send a Message to this Supplier

#### Supplier Details

**Shenzhen Haiwang Sensor Co.,Ltd.**

[Guangdong, China (Mainland)]

Business Type:

Manufacturer

[Contact Details](#)

[Gold Supplier \[2<sup>nd</sup> Year\]](#)

[A&V Checked](#)

Online Showroom: [1,538 Products](#)

[30 Similar Products from this Supplier](#)

[View this Supplier's Website](#)

#### Product Details

#### Company Profile

[Report item](#)

#### Quick Details

Place of Origin: Guangdong China (Mainland)

Brand Name: HW

Material: ABS PVC

Magnification: 3X,4X,5X

Item: LED card magnifier

Packing: OPP,PVC,PE

#### Specifications

- 1.LED card magnifier
- 2 More than 10 years produced experience.
- 3 Reasonable price with best service.

### LED card magnifier

Image :



LED magnifier

Search Products

About 33642 results: Plastic Crafts (205), Other Gifts & Crafts (386), Gift Sets (130), Glass Crafts (156)

Advanced Search

Home > Products > Gifts & Crafts > Other Gifts & Crafts (316748)

Language Options



See larger image: Good Quality+Cheap Price PVC material LED Magnifier

Add to My Favorites

### Good Quality+Cheap Price PVC material LED Magnifier

FOB Price: US \$0 - 0.22 / Piece  
[Get Latest Price](#)

Port: Shenzhen

Minimum Order Quantity: 3000 Piece/Pieces

Supply Ability: 500000 Piece/Pieces per Quarter

Payment Terms: T/T, Western Union, Paypal

Sample or Mini-Order: [Order now](#) via

Ms. CiCi Obama  
[I'm Online](#)  
[Chat Now!](#)

Contact Supplier

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#### Supplier Details

**Shenzhen Haiwang Sensor Co.,Ltd.**

[Guangdong, China (Mainland)]

Business Type:

Manufacturer

[Contact Details](#)

[Gold Supplier \[2<sup>nd</sup> Year\]](#)

[A&V Checked](#)

Online Showroom: [1,536 Products](#)

[30 Similar Products from this Supplier](#)

[View this Supplier's Website](#)

#### Product Details

#### Company Profile

[Report item](#)

#### Quick Details

Material: pvc

Use: Magnifying

Place of Origin: Guangdong China (Mainland)

Character: with LED

Technique: Printed

Theme: Angel

Brand Name: HW

Style: Antique Imitation

Regional Feature: China

Model Number: CM-98LED

#### Packaging & Delivery

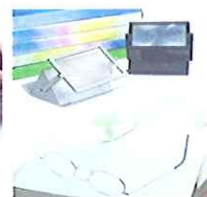
Packaging Detail: Size:98\*60\*6MM

Delivery Detail: about one week

#### Specifications

- 1. easy to carry
- 2. a kind of promotional item
- 3. the cheapest price
- 4. excellent quality

### Good Quality+Cheap Price PVC material LED Magnifier



#### Introduction:

Size:98\*60\*6mm

Opp bag