



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: 27<sup>th</sup> May 2011  
OUR REF: 13287-L/BK/B/126-cnnic  
YOUR REF:  
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau  
Direct e-mail: [elsielau@bk.com.hk](mailto:elsielau@bk.com.hk)

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**BY POST BY FAX (86-10-58812666)**

**BY EMAIL (service@cnnic.cn; supervise@cnnic.cn)**

中国互联网络信息中心  
中国北京中关村南四街四号  
中国科学院软件园1号楼一层  
100190

Dear Sir,

**Re: Infringement of Copyright**  
**Respondent: 中国互联网络信息中心**

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 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 State Intellectual Property Office of the PRC with registration no. ZL 200630010675.0 ("the PRC Registered Design"). Our client has the right to take legal action to protect the PRC Registered Design which is also protected under the laws in PRC.

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

It has come to our client's attention that you have been offering and/or exposing for sale and/or assisting and/or causing one named "Ningbo Tongzhou International Trading Co., Ltd." to offer and/or expose for sale a LED light products named "Wall Light" with model nos. TZT-1008 and TZT-1009 ("the Infringing Products"), which are reproductions or contain substantial reproduction of our client's Product.

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27<sup>th</sup> May 2011  
中国互联网络信息中心

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

1. [http://www.tradetz.cn/product\\_view.asp?id=1995](http://www.tradetz.cn/product_view.asp?id=1995); and
2. [http://www.tradetz.net/product\\_view.asp?id=1995](http://www.tradetz.net/product_view.asp?id=1995)

Copies of the webpages featuring the Infringing Products marked **Annexure B** are enclosed.

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** issuing the Infringing Products to the public; and
2. **Forthwith undertake** to stop in the future the dealings in or with the Infringing Products.

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 6<sup>th</sup> June 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,

BK & Y

BENNY KONG & YEUNG, Solicitors

Encl

JC/ el

c.c. (1) client

(2) 中国互联网络信息中心[BY POST (中國北京 349 信箱 6 分箱 CNNIC 100190)]

# **Annexure A**

**Our client's Product named "Wireless Led Task Light"**

**with model no. H-620**



# **Annexure B**



About us



Products



Pdf Catalogue



Online Message



Contact us



Back Home

Products

- LED Flashlight
- Dynamo Flashlight
- Pen Light
- LED Keychain Light
- Solar Products
- Camping Light
- Head Light
- Bicycle Light
- Promotional Products
- Digital Timer



Products

Wall Light--TZZ-1008



Products Name	Wall Light
Item No.	TZZ-1009
Material	ABS,PS
Size	9*9*5 cm
Packing	white box
LED	5 LED

led flashlight,keychain led flashlight,pen led flashlight,plastic led flashlight,rubber flashlight,aluminium led flashlight,led light bulb,book led light,dynamo flashlight,emergency led flashlight,head led light and camping led lantern,dynamo led flashlight,emergency flashlight



Add Room 515, Building 1, Eastern Business Center, Jiangdong District Ningbo, China  
 Tel: 0086-574-27895155 27895165 27895168  
 Fax: 0086-574-27895161

Email: [sales@tradetz.net](mailto:sales@tradetz.net)



About us



Products



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Back Home

Products

- LED Flashlight
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- Bicycle Light
- Promotional Products
- Digital Timer



Products

Wall Light→TZT-1008



Products Name	Wall Light
Item No.	TZT-1009
Material	ABS,PS
Size	9*9*5 cm
Packing	white box
LED	5 LED

led flashlight, keychain led flashlight, pen led flashlight, plastic led flashlight, rubber flashlight, aluminium led flashlight, led light bulb, book led light, dynamo flashlight, emergency led flashlight, head led light and camping led lantern, dynamo led flashlight, emergency flashlight



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