



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: 27th May 2011
OUR REF: 13287-L/BK/B/126-wanhe
YOUR REF:
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau
Direct email: elsielau@bk.com.hk

香港金鐘夏愨道16號遠東
金融中心 29樓2901室
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BY POST BY FAX (86-574-87890673)
BY EMAIL (commodity@wan-he.com; sales@wan-he.com)

Ningbo Wanhe Import & Export Co., Ltd.
Room 601-605, Jindu International Building,
No. 235 Baoshan Road, Haishu District,
Ningbo, Zhejiang, China 315000

Attn: Mr. James Zhu/ Ms. Fuyun Gao

Dear Sir:

Re: Infringement of Copyright
Respondent: Ningbo Wanhe Import & Export 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 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.

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.

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27th May 2011
Ningbo Wanhe Import & Export Co., Ltd.

It has come to our client's attention that you are promoting, offering and/or exposing for a LED light product named "5LED Touch Light" with model nos. WHC-1027 and TL-020 ("the Infringing Products"), which are reproductions or contain 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://nbwanhe.en.alibaba.com/product/332943196-210242075/5LED Touch Light.html](http://nbwanhe.en.alibaba.com/product/332943196-210242075/5LED_Touch_Light.html); and
2. <http://www.wh-commodity.com/showpro.asp?ArticleID=86&name=TL-020>

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.

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

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27th May 2011
Ningbo Wanhe Import & Export Co., Ltd.

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 6th 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,



Benny Kong & Yeung, Solicitors

Encl

JC/el

c.c. (1) client

(2) Ningbo Wanhe Import & Export Co., Ltd. [BY POST (Room 5-3, No. 345, South Section, Huancheng West Road, Haishu, Ningbo, Zhejiang, China 315012)]

Annexure A

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

with model no. H-620



Annexure B

1st year



Ningbo Wanhe Import & Export Co., Ltd.

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3LED Touch Light...



5LED Touch Light...



3LED Touch Light...



Touch Light...



Heart Shaped Touch Light...



Touch Light...



2LED Sensor Lamp...

Ningbo Wanhe Import & Export Co., Ltd.
[Zhejiang, China (Mainland)]

A&V Checked

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Company Profile

Management

Contact Person



Mr. James Zhu

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View Contact Details

5LED Touch Light



5LED Touch Light

Add to My Favorites

Report Suspicious Activity

Product Details:

Place of Origin	Zhejiang, China (Mainland)
Brand Name	WANHE
Model Number	WHC-1027
Color	White
Input Voltage	12v
Life	30,000h
Touch Light	Touch Light

Payment & Shipping Terms:

Price:	FOB USD 0.01-0.1 / Piece Get Latest Price
Minimum Order Quantity:	3000 Piece/Pieces 1000
Port:	NINGBO/SHANGHAI
Packaging Details:	each pack in polybag+white box
Delivery Time:	in 20 days after order confirmed
Payment Terms:	L/C,D/A,D/P,T/T,Western Union,MoneyGram
Supply Ability:	500000 Piece/Pieces per Month 5000000

I'm Away

View Contact Details

« Prev Product ... 15 16 17 18 19 20 21 ... Next Product »

Detailed Product Description

5LED Touch Light
-Bulb Type: 5 LED
-Battery: 3*AAA, excluded

5LED Touch Light
-Push light, touch lamp
-Bulb Type: 5 LED
-Battery: 3*AAA, excluded

Language Option ▼



PRODUCTS CATALOGUE

- ▶ Beauty care
- ▶ Kitchenware
- ▶ Clean Item
- ▶ Bath Accessories
- ▶ Travel Essentials
- ▶ Gift
- ▶ As Seen On TV
- ▶ Flashlight
- ▶ Tool Accessories
- ▶ Garden Accessories

Product Show



PRODUCTS SEARCH

Enter keyword SEARCH

Description: 5LED Touch Light
 Item NO.: TL-020
 Remarks:

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