



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: 4th July 2011
OUR REF: 13287-L/BK/B/126-ali(22)
YOUR REF:
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau
Direct e-mail: elsielau@bk.com.hk

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阿里巴巴
中国杭州市滨江区
网商路 699 号
滨江新园区 310052

Dear Sir,

Re: Infringement of Copyright
Respondent: 阿里巴巴

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 Task Light" with model no. H-620, "Wireless LED under Cabinet Light" with model no. H-703 and "Wireless Led Book/Clip Light" with model no. H-795XL ("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** are enclosed.

Our client is also the registered proprietor of the design of our client's Products registered in the State Intellectual Property Office of the PRC with registration nos. ZL 200630010675.0, ZL 200730004063.5 and ZL 200730160682.3 respectively ("the PRC Registered Designs"). Our client has the right to take legal action to protect the PRC Registered Designs which are also protected under the laws in PRC.

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

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It has come to our client's attention that you have been offering and/or exposing for sale and/or assisting and/or causing ones named "Ningbo Yinzhou Baolai Electronic Plastic Factory", "China Ningbo Wahfay Industrial (group) Co., Ltd.", "Ningbo Realgood Industrial Co., Ltd.", "Ningbo Best-Home Imp. & Exp. Co., Ltd.", "Zhe Jiang Qianda Imp. & Exp. Co., Ltd.", "Ningbo Winner Import & Export Co., Ltd.", "Gold Gain Enterprise Ltd." and "Hengye Int'l Trading Co., Ltd." to offer and/or expose for sale a LED light products ("the Infringing Products"), which are reproductions or contain substantial reproduction of our client's Product.

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

1. http://www.alibaba.com/product-gs/370165421/5led_push_flashlight.html;
2. http://www.alibaba.com/product-gs/200625809/LED_Touch_Light.html;
3. http://baolai.en.alibaba.com/product/200625809-209584550/LED_Touch_Light.html;
4. http://baolai.en.alibaba.com/product/370165421-209584550/5led_push_flashlight.html;
5. http://wahfay.en.alibaba.com/product/353992959-209521464/5LED_TOUCH_LAMP.html;
6. http://wahfay.en.alibaba.com/product/354001715-209521464/5LED_TOUCH_LAMP.html;
7. http://realgood.en.alibaba.com/product/267424823-200198462/Rotatable_Touch_light_Model_RGWJ276.html;
8. http://realgood.en.alibaba.com/product/206691371-200198462/3pcs_Screw_and_Click_Led_Lights_Model_39999.html;
9. http://realgood.en.alibaba.com/product/206691273-200198462/3pcs_Stick_N_Click_Light_as_seen_on_TV_Model_28196.html;
10. http://realgood.en.alibaba.com/product/206749721-200198462/Quick_Easy_5_Led_Light_Model_28871.html;
11. http://realgood.en.alibaba.com/product/464570782-200198462/3PCS_Touch_Light_Model_28196.html;
12. http://www.alibaba.com/product-gs/206691577/3pcs_1Led_Touch_Lamp_Model_26303.html;
13. http://www.alibaba.com/product-gs/206691273/3pcs_Stick_N_Click_Light_as.html;
14. http://www.alibaba.com/product-gs/206691371/3pcs_Screw_and_Click_Led_Lights.html;
15. http://www.alibaba.com/product-gs/267424823/Rotatable_Touch_light_Model_RGWJ276.html;
16. http://www.alibaba.com/product-gs/213606697/TORCH_LIGHT.html;
17. http://www.alibaba.com/product-gs/213606463/TOUCH_LIGHT.html;

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18. http://besthome.en.alibaba.com/product/213606463-200270766/TOUCH_LIGHT.html;
19. http://besthome.en.alibaba.com/product/213606697-200270766/TORCH_LIGHT.html;
20. http://www.alibaba.com/product-gs/283926041/LED_touch_lamp.html;
21. http://www.alibaba.com/product-gs/286059795/LED_spotlight.html;
22. http://sanmoo.en.alibaba.com/product/283926041-200380862/LED_touch_lamp.html;
23. http://sanmoo.en.alibaba.com/product/286059795-200380862/LED_spotlight.html;
24. http://www.alibaba.com/product-gs/223216219/LED_Book_Light.html;
25. http://winnerproducts.en.alibaba.com/product/223216219-200655352/LED_Book_Light.html;
26. http://www.alibaba.com/product-gs/373466383/LED_BOOK_LIGHT.html;
27. http://goldgain.en.alibaba.com/product/373466383-210697226/LED_BOOK_LIGHT.html;
28. http://www.alibaba.com/product-free/105008627/4_led_book_light.html; and
29. http://www.alibaba.com/product/weeken-105008627-0/4_led_book_light.html

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 14th July 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. client

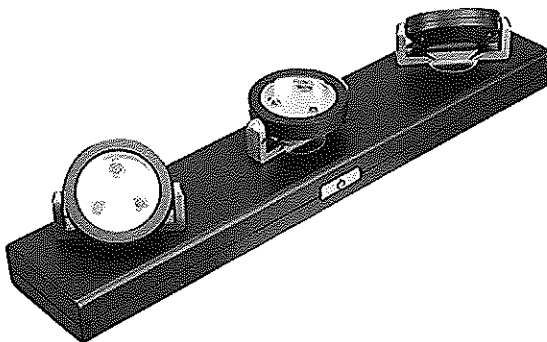
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Annexure

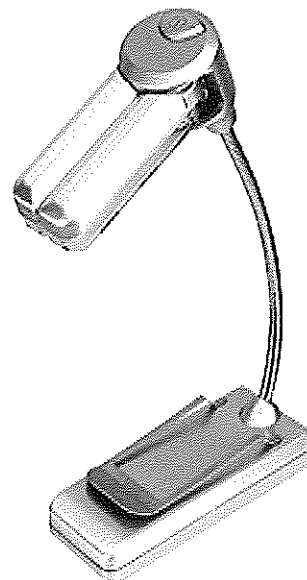
Our Client's Products



“Wireless Led Task Light” with model no. H-620



“Wireless LED under Cabinet Light”
with model no. H-703



“Wireless Led Book/Clip Light”
with model no. H-795XL