



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: 4<sup>th</sup> July 2011  
OUR REF: 13287-L/BK/B/126-todaynic  
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  
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**BY POST BY FAX (26120931)**  
**BY EMAIL (support@tnet.hk; info@todaynic.com)**

Todaynic.com International Limited  
3C, Centre Mark II,  
313 Queen's Road Central,  
Sheung wan, HK

Dear Sir,

**Re: Infringement of Copyright**  
**Respondent: Todaynic.com International Limited**

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** 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 with registration no. 0701963.9 ("the Hong Kong Registered Design"). Our client has the right to take legal action to protect the Hong Kong Registered Design which is also protected under the laws in Hong Kong.

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.

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 "China Ningbo Wahfay Industrial (group) Co., Ltd." to offer and/or expose for sale a LED light products named "5LED TOUCH LAMP" with model nos. HF918123, HF918132, HF918131, HF918109 and

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Todaynic.com International Limited

HF918109-A and “3PC 5LED TOUCHING LAMP” with model no. HF918203 (“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.wahfay.com/ProductDetail.asp?id=86781681&class2name=Touchlamp;>
2. <http://www.wahfay.com/ProductDetail.asp?id=-393933010&class2name=Touchlamp;>
3. <http://www.wahfay.com/ProductDetail.asp?id=-890103038&class2name=Touchlamp;>
4. <http://www.wahfay.com/ProductDetail.asp?id=-1303869320&class2name=Touchlamp;>
5. <http://www.wahfay.com/ProductDetail.asp?id=-1231432774&class2name=Touchlamp;>
6. <http://www.wahfay.com/ProductDetail.asp?id=-1003541680&class2name=Touchlamp;> and
7. [http://www.wahfay.com/ProductDetail.asp?id=-1873321749&class2name=Touchlamp](http://www.wahfay.com/ProductDetail.asp?id=-1873321749&class2name=Touchlamp;)

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 14<sup>th</sup> July 2011**, 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.

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Todaynic.com International Limited

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) Todaynic.com, Inc. [BY POST (G/F, 5 Building, Xiangning Road, Zhuhai City (Beside ICBC), Guangdong, China 519001) BY FAX (86-756-2282526)]

# Annexure

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

with model no. H-620

