



專利、商標及外觀設計註冊代理人  
Agents for Patents, Trade Marks and Designs

DATE : 10<sup>th</sup> August 2011  
OUR REF : 13287-L/BK/B/126-godaddy  
YOUR REF :  
REPLY TO : Ms. Jennifer Chong/ Ms. Elsie Lau  
EMAIL : [elsielau@bk.com.hk](mailto:elsielau@bk.com.hk)

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**BY POST BY FAX (1-480-5058844) BY EMAIL (PR@GoDaddy.com)**

GoDaddy.com, Inc.  
14455 N. Hayden Road,  
Suite 219, Scottsdale,  
AZ 85260, North America

Dear Sir,

**Re: Infringement of Copyright**  
**Respondent: GoDaddy.com, Inc.**

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 City Deby Electrical Co., Ltd." to offer and/or expose for sale a LED light product named "Touch Light" with model no. DBTL-0006 ("the Infringing Product"), which is reproduction or contains substantial reproduction of our client's Product.

In particular, you featured photograph of the Infringing Product at your website at [http://www.china-flashlight.com/china-flashlight/china-flashlight\\_825.html](http://www.china-flashlight.com/china-flashlight/china-flashlight_825.html)

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10<sup>th</sup> August 2011  
GoDaddy.com, Inc.

Copy of the webpage featuring the Infringing Product marked **Annexure B** is enclosed.

By such unauthorised acts in dealing with the Infringing Product, you have infringed our client's copyright. You are demanded to immediately stop all dealings in and with the Infringing Product and to confirm that you will comply with the following:-

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

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 20<sup>th</sup> August 2011**, our client will appoint US 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.

Yours faithfully,

BK & Y

BENNY KONG & YEUNG, Solicitors  
Encl  
JC/ el  
c.c. client

# **Annexure A**

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

**with model no. H-620**



# **Annexure B**



**Ningbo City Deby Electrical Co., Ltd.**

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**PRODUCTS**

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✉ [sales@china-flashlight.com](mailto:sales@china-flashlight.com)

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## Professional LED Products Manufacturer

Product Catalogue

### General LED Flashlight

- 1-11 Bulb
- 12-20 Bulb
- 21-40 Bulb
- 41+ Bulb
- Strawhat LED

### High Power Flashlight

- General High Power
- Adjustable Beam
- Rechargeable
- Super Bright

### UV Flashlight

### Printed Flashlight

### Stainless Steel Torch

### Car Cigarette Lighter Flashlight

### Dynamo Flashlight

### Other Flashlight

### Clip Light

### Keychain Light

### Carabiner Flashlight

### Headlamp

### Bicycle Light

### Touch Light

### Lantern

### Penlight

### Novelty Flashlight

### Cap Light

### Camping Light

### Working Light

### Plastic Torch

### Retail

### Series

### Packaging

### Accessory



Search  
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### Touch Light

Item No.: DBTL-0006

### Wireless 5 LED Puck Light

Click [Wireless LED Puck Light](#) for more similar items

### SPECIFICATIONS

Lamp: 5

Max Output: 16,000-18,000mcd each LED

Battery: 3\*AAA

Size: L88xW88mm

Weight: 64g(without battery)

### DESCRIPTIONS

- Easily stick to any flat surface where you need light, such as closets, storage rooms, beds, etc.
- Magnets for iron surface is optional and available
- All-purpose item as promotional gift, premium, tool light, etc.
- Light head swivels and pivots for ideal positioning.
- China wireless LED puck light manufacturer, China wireless LED puck light supplier, China direct exporter

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LED Flashlight, High Power Flashlight, Tactical Flashlight, Dynamo Flashlight, China LED Flashlight Manufacturer, China LED Torch Factory, China LED Flashlight Supplier