BENNY KONG & YEUNG SOLICITORS





專利、商標及外觀設計註冊代理人

Agents for Patents, Trade Marks and Designs

10th August 2011

OUR REF :

DATE

13287-L/BK/B/126-lingguang

YOUR REF:

REPLY TO:

Ms. Jennifer Chong/ Ms. Elsie Lau

EMAIL

elsielau@bk.com.hk

香港告士打道160號 海外信託銀行大廈19樓 B

19th Floor ,Unit B **OTB** Building 160 Gloucester Road Hong Kong

T: +852 2519 3567 F: +852 2519 3610 E: enquiry@bk.com.hk W: www.bk.com.hk

BY POST BY FAX (86-574-65181064) BY EMAIL (lgelectric@lgelectric.com; azona@lgelectric.com)

Ningbo Lingguang Electric Appliance Co., Ltd. 100 South Xidian Road, Xidian Town, Ningbo, Zhejiang, China 315040

Attn:

Ms. Azona Zhang

Dear Sir:

Re: Infringement of Copyright

Respondent: Ningbo Lingguang Electric Appliance 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 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 photograph featuring our client's Products marked Annexure A are 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 and ZL 200730160682.3 ("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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10th August 2011 Ningbo Lingguang Electric Appliance Co., Ltd.

It has come to our client's attention that you are promoting, offering and/or exposing for a LED light products named "Camping tent lamp" with model no. LG7051, LG92932 and LG92765 ("the Infringing Products"), which are reproductions or contain substantial reproduction of our client's Products.

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

- 1. http://lgelectric.en.alibaba.com/product/275212332-50338401/Camping_tent_lamp.html;
- 2. http://www.alibaba.com/product-gs/275212332/Camping_tent_lamp.html;
- 3. http://www.lgelectric.com/products_detail.asp?id=921; and
- 4. http://www.lgelectric.com/products_detail.asp?id=328

Copies of the webpage 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 <u>Statutory Declaration</u>, 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.

10th August 2011 Ningbo Lingguang Electric Appliance 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 20th August 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 44

Benny Kong & Yeung, Solicitors Encl JC/el c.c. client

Annexure A

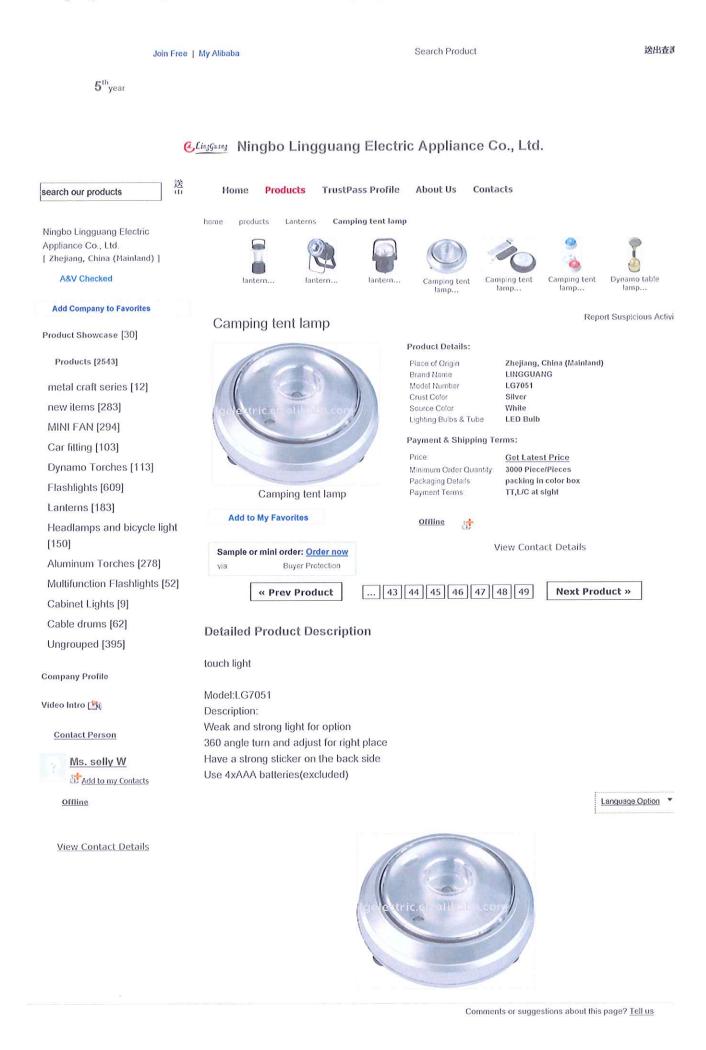


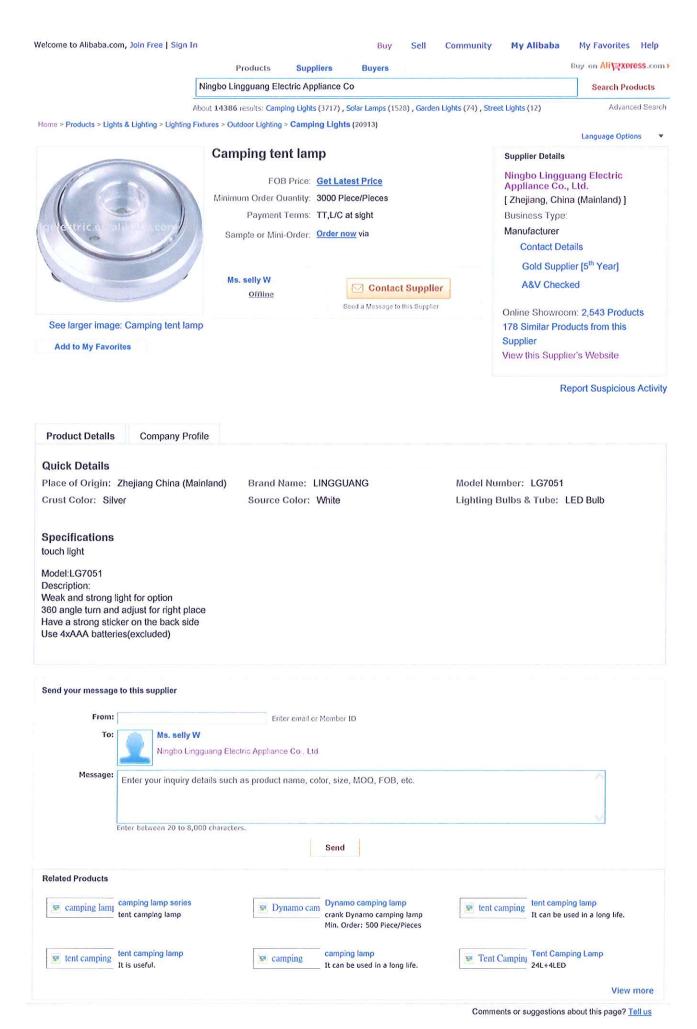
Our client's Product named "Wireless Led Task Light" with model no. H-620



"WIRELESS LED BOOK/CLIP LIGHT" with model no. H-795XL

Annexure B









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