



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: 20<sup>th</sup> January 2010  
OUR REF: 13287-L/BK/B/126-huashun  
YOUR REF:  
REPLY TO: Ms. Jennifer Chong/ Ms. Katherine Law  
Direct email: [katherinelaw@bk.com.hk](mailto:katherinelaw@bk.com.hk)

香港金鐘夏愨道16號遠東  
金融中心 29樓2901室  
Unit 2901, 29<sup>th</sup> Floor, Far  
East Finance Centre, 16  
Harcourt Road, Admiralty,  
Hong Kong

☎ : +852 2519 3567  
☎ : +852 2519 3610  
(Litigation)  
+852 2519 9758  
(Registration)  
✉ : [enquiry@bk.com.hk](mailto:enquiry@bk.com.hk)  
🌐 : [www.bk.com.hk](http://www.bk.com.hk)

**BY POST BY FAX (86-574-6365-5268) BY EMAIL (cxhsh@cxhsh.com)**

Cixi Huashun Electronics Co., Ltd.  
10 Fuxing Road  
Shiqiao Industrial Park  
Cixi, Zhejiang Province  
China 315400  
慈溪华顺电子有限公司  
中国浙江省慈溪市  
师桥工业园复兴路 10 号

Attn.: Mr. Yu

Dear Sirs,

**Re: Infringement of Copyright**  
**Respondent: Cixi Huashun Electronics 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.

A copy of the photograph featuring our client’s Product marked **Annexure A** is enclosed.

Our client is also the registered proprietor of the designs of our client’s Product registered in the Hong Kong Registered Designs Registry with registration no. 0802486.9M0015 (“the Hong Kong Registered Designs”). Our client also has the right to take legal action to protect the Hong Kong Registered Designs which is also protected under the laws in Hong Kong.

The Hong Kong Registered Designs is applied to our client’s Product. The rights and privileges conferred in respect of the Hong Kong Registered Designs are valid and subsisting.

.../2

-2-

20<sup>th</sup> January 2010  
Cixi Huashun Electronics Co., Ltd.

It came to our client's attention that you are promoting, offering and/or exposing for sale LED light product named "5 LED touch light" ("the Infringing Product"), which is a reproduction or contains substantial reproductions of our client's Product.

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

1. [http://www.cxhsh.com/En/proview.asp?P\\_ID=243](http://www.cxhsh.com/En/proview.asp?P_ID=243); and
2. [http://www.cxhsh.com/En/proview.asp?P\\_ID=244](http://www.cxhsh.com/En/proview.asp?P_ID=244).

Copies of the webpages featuring the Infringing Product marked **Annexure B** are enclosed.

By such unauthorized 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** all offer and/or exposure for sale and/or possession or howsoever any dealings in or with the Infringing Product.
2. You undertake to stop dealing in or with the Infringing Product in the future.
3. You do deliver up to our client all items of Infringing Product, 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 Product, including the name and address of the supplier(s) of the Infringing Product; and exhibiting thereto all purchase documents, receipts and invoices relating to your dealings in or with the Infringing Product.

.../3

-3-

20<sup>th</sup> January 2010  
Cixi Huashun Electronics Co., Ltd.

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.

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 30<sup>th</sup> January 2010**, 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. Katherine Law at (+852) 25193567.

如對以上有任何問題，請與本行羅小姐聯絡 (電話 +852-2519-3567)。

Yours faithfully,



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

# **Annexure A**

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

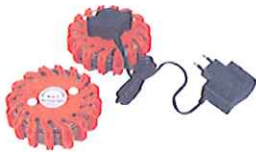


# **Annexure B**



New Products

New Products >> Touch lamp



5 LED touch light

Products List

- ▣ Safety light
- ▣ LED traffic baton
- ▣ Camping lamp
- ▣ Dynamo flashlight
- ▣ Shake flashlight
- ▣ Working light
- ▣ Multifunctional screwdrivers
- ▣ Solar mobile charger
- ▣ Touch lamp
- ▣ Other series



1. Ultra bright white 5 LED lights;
2. Extra long active time, up to 100 hours of light on a single set of batteries;
3. Double-side adhesive for stick on anywhere or hung on nail;
4. Light direction can be changed;
5. Easy to turn on/off just dot it. 2 brightness selections: strong light or stronger light;
6. Each light requires 3 AAA batteries (not included);
7. Color is selectable.

[【ClickBack】](#)



New Products

New Products >> Touch lamp



5 LED touch light

Products List

- 1 Safety light
- 2 LED traffic baton
- 3 Camping lamp
- 4 Dynamo flashlight
- 5 Shake flashlight
- 6 Working light
- 7 Multifunctional screwdrivers
- 8 Solar mobile charger
- 9 Touch lamp
- 0 Other series



1. Ultra bright white 5 LED lights;
2. Extra long active time, up to 100 hours of light on a single set of batteries;
3. Double-side adhesive for stick on anywhere or hung on nail;
4. Light direction can be changed;
5. Easy to turn on/off, just dot it, 2 brightness selections - strong light or stronger light;
6. Each light requires 3 AAA batteries (not included);
7. Color is selectable.

【ClickBack】