



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: 11<sup>th</sup> May 2010  
OUR REF: 13287-L/BK/B/126-plus  
YOUR REF:  
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau  
Direct e-mail: [elsielau@bk.com.hk](mailto:elsielau@bk.com.hk)

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**BY POST BY FAX (86-574-87915101)**

Ningbo Plus Bright Imp.&Exp. Incorporated Company  
Rm 1440-1441, No. 17 Building,  
Jiuwu Int' Business Building,  
No.598 Jiangnan Road,  
Ningbo, Zhejiang,  
China 315040

Attn: Ms. Cathy Xia

Dear Sirs,

**Re: Infringement of Copyright**  
**Respondent: Ningbo Plus Bright Imp.&Exp. Incorporated Company**

We act for Honwell Products (HK) Limited.

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 Track Lighting" with model no. H-703 ("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. 0700459.9 ("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.

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11<sup>th</sup> May 2010  
Ningbo Plus Bright Imp.&Exp. Incorporated Company

It came to our client's attention that you are promoting, offering and/or exposing for sale LED light product named "9LED Wireless LED Light (6AAA)" with model no. PL8003 ("the Infringing Product"), which is a reproduction or contains substantial reproductions of our client's Product.

In particular, you featured a photograph of the Infringing Product at your website at [http://www.alibaba.com/product-gs/281885191/9LED\\_Wireless\\_LED\\_Light\\_6AAA.html](http://www.alibaba.com/product-gs/281885191/9LED_Wireless_LED_Light_6AAA.html)

A copy of the webpage featuring the Infringing Product marked **Annexure B** is 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.
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.

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11<sup>th</sup> May 2010  
Ningbo Plus Bright Imp.&Exp. Incorporated Company

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 21<sup>st</sup> May 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. Elsie Lau at (+852) 25193567.

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/llk

c.c. client

# **Annexure A**

**Our client's Product named "Wireless LED Track Lighting"**  
**with model no. H-703**



# **Annexure B**



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Check out all Product Listings for led push light

Related Searches: led push light 2 led push light led push button light led push lamp

9LED Wireless LED Light (6AAA)

Add Product to Favorites Report item



See larger image: 9LED Wireless LED Light (6AAA)

Place of Origin: Zhejiang China (Mainland)
Brand Name: Plus Brite
Model Number: PL8003
Light Source: LED
Certificate Standard: CE
Usage: Room
Power Generation: Switch
Color: metal color/silver
Port: NINGBO
Payment Terms: LC,T/T
Minimum Order Quantity: 500 Unit/Units
Supply Ability: 500 Unit/Units per Day
Package: COLOR BOX/ DOUBLE BLISTER CARD
Delivery Time: 20-30 DAYS

Supplier Details

Ningbo Plus Bright Imp. & Exp. Incorporated Company
[Zhejiang, China (Mainland)]

Gold Supplier [ 1st Year ]
Verified Supplier

Business Type:
Manufacturer, Trading Company

Product/Services:
Solar light,camping lantern,sensor light,aluminum torch,bicycle ...

Online Showroom: 184 products

other similar products from this supplier

Contact Details

View this Supplier's Website >>

Add Company to Favorites

Ms. Cathy Xia
Offline

Contact Now

Send a message to this supplier

Product Details Company Profile

Place of Origin: Zhejiang China (Mainland)
Light Source: LED
Power Generation: Switch
Power Source: Battery

Brand Name: Plus Brite
Certificate Standard: CE
Color: metal color/silver
colour: metal color/silver

Model Number: PL8003
Usage: Room
Material: ABS

9LED Wireless LED Light (6AAA)

9LED Wireless LED Light (6AAA)

Send your message to this supplier



Ms. Cathy Xia
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