

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: 30th April 2010
OUR REF: 13287-L/BK/B/126-gaoli
YOUR REF:
REPLY TO: Ms. Jennifer Chong/ Ms. Elsie Lau
Direct e-mail: elsielau@bk.com.hk

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金融中心 29樓2901室
Unit 2901, 29th Floor, Far
East Finance Centre, 16
Harcourt Road, Admiralty,
Hong Kong

BY HAND

Ningbo Gaoli Plastic Product Co., Ltd.
Booth No.: 3GJ76
Hong Kong Gifts & Premium Fair 2010,
Hong Kong Convention and Exhibition Centre,
Wanchai, Hong Kong.

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☎ : +852 2519 3610
(Litigation)
+852 2519 9758
(Registration)
✉ : enquiry@bk.com.hk
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Dear Sirs,

Re: Infringement of Copyright
Respondent: Ningbo Gaoli Plastic Product Co., Ltd.

We act for Honwell Products (HK) Limited.

Our client is the owner of the copyright subsisting in original artistic works in relation to the design of its popular LED light products named "Wireless LED Book Clip Light" with model no.H-795XL, "Wireless LED Under Cabinet Light" with model no.H640, "Wireless LED Track Lighting" with model no.H703 and "Wireless LED Spotlight" with model no.H740 ("our client's LED 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 Hong Kong and PRC.

Copies of the photographs featuring our client's Products marked **Annexure A** are enclosed.

It has come to our client's attention that you have been promoting, offering for sale, distributing and/or exposing for sale LED light products named "Closet light" with model nos. MY-5562-6LED, MY-5563-9LED/12LED and MY-5563A-3LED and "LED Book Light" with model no. MY-5304 ("the Infringing Products"), which are reproductions or contain substantial reproductions of our client's Products.

A copy of the catalogue featuring the Infringing Products marked **Annexure B** is enclosed

In particular, you featured, offered and/or exposed for sale and sale of the Infringing Products at booth no. 3GJ76 at the Hong Kong Gifts & Premium Fair 2010 at Hong Kong Convention and Exhibition Centre.

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30th April 2010
Ningbo Gaoli Plastic Product Co., Ltd.

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** 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 Statutory Declaration, 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.

You are requested to cease all offer and/or exposure for sale and/or possession or purchase or howsoever dealings in or with the Infringing Product **forthwith** or 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.

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. (1) client

(2) Ningbo Gaoli Plastic Product Co., Ltd. [BY FAX (86-574-65170082)]

BY EMAIL (vivian@gaoliplastic.com)

Annexure A

Our client's Products



**“Wireless LED Under Cabinet Light”
with model no. H-640**



**WIRELESS LED BOOK/
CLIP LIGHT” with model
No. H-795XL**



**“Wireless LED Track Lighting” with
model no. H-703**



**“Wireless LED Spotlight” with model
no. H-740**

Annexure B

The Infringing Products named

“Closet light” with model nos.

MY-5562-6LED,

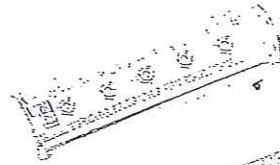
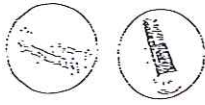
MY-5563-9LED/12LED and

MY-5563A-3LED



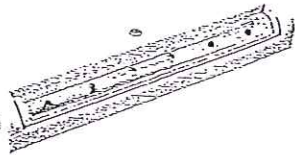
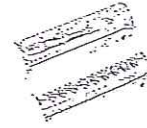
MY-5561-4LED

Closest light
Item Size: 12 x 4 x 4cm
PKG: Double blister
Batteries: 3AAA



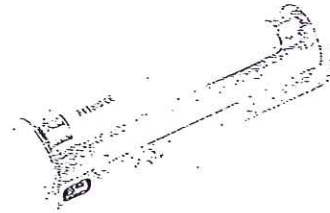
MY-8561-4/5/18(LED)

Closest light
Item Size: 16 x 16 x 4cm
PKG: Double blister
Master CTN: 60pcs
CTN Size: 73.5 x 28.5 x 40cm
Batteries: 4AA



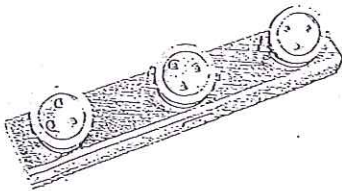
MY-5562-6LED

Closest light
Item Size: 22 x 5.5 x 2.5cm
PKG: Double blister
Batteries: 3AAA



MY-8561

Closest light
Item Size: 16 x 4 x 4cm
PKG: Double Blister
Master CTN: 60pcs
CTN Size: 73.5 x 28.5 x 40cm
Batteries: 4AA

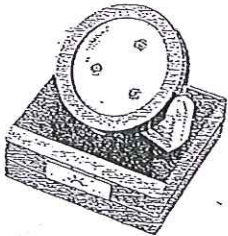


MY-5563-9LED/12LED

Closest light
Item Size: 30 x 6 x 3cm
PKG: Double blister
Batteries: 6AAA

MY-8563(2Blub)

Closest light
Item Size: 16 x 4 x 4cm
PKG: Double Blister
Master CTN: 60pcs
CTN Size: 73.5 x 28.5 x 40cm
Batteries: 4AA



MY-5563A-3LED

Closest light
Item Size: 7 x 6.5 x 6.5CM
PKG: Double blister
Batteries: 3AAA



MY-8562

Closest light
Item Size: 31 x 4 x 4cm
PKG: Double Blister
Master CTN: 60pcs
CTN Size: 73.5 x 45.5 x 40cm
Batteries: 8AA