



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: 15<sup>th</sup> March 2011  
OUR REF: 13287-L/BK/B/126-ali(21)  
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 (86-571-89815505)**

**BY EMAIL ([b2b-ccbu-ipr@alibaba-inc.com](mailto:b2b-ccbu-ipr@alibaba-inc.com), [legal@alibaba-inc.com](mailto:legal@alibaba-inc.com))**

阿里巴巴  
中国杭州市滨江区  
网商路 699 号  
滨江新园区 310052

Dear Sir,

**Re: Infringement of Copyright**  
**Respondent: 阿里巴巴**

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 Book/Clip Light" with model no. H-795XL, "Wireless Led Task Light" with model no. H-620, "Micro Magnifier with LEDs" with model no. H-670 and "3X / 5X LED Magnifier" with model no. H-679 ("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 photographs featuring our client's Products marked **Annexure** are enclosed.

Our client is also the registered proprietor of the design of our client's Product registered in the Hong Kong Registered Designs Registry with registration nos. 0701963.9, 0802486.9M015, 0702447.6 and 0901496.0M021 and the State Intellectual Property Office of the PRC with registration nos. ZL200730160682.3, ZL200630010675.0, ZL200730323356.X and ZL200930211133.3 ("the Hong Kong and PRC Registered Designs"). Our client has the right to take legal action to protect the Hong Kong and PRC Registered Designs which are also protected under the laws in Hong Kong and the PRC.

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

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-2-

15<sup>th</sup> March 2011  
阿里巴巴

It has come to our client's attention that you have been offering and/or exposing for sale and/or assisting and/or causing ones named “奉化市送恩电器有限公司”, “Ninghai Dongxing Electronic Co., Ltd.”, “宁波闪煌电器有限公司”, “Welkin Imp & Exp Co., Ltd.”, “Shenzhen Haiwang Sensor Co., Ltd.” and “Jinhua Top Optical Instrument Co., Ltd.” to offer and/or expose for sale a LED light products (“the Infringing Products”), which are reproductions or contain substantial reproduction of our client's Product.

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

1. <http://detail.china.alibaba.com/buyer/offerdetail/872392264.html>;
2. <http://www.song-en.com.cn/athena/offerlist/gaozhe234-sale-true-5826198.html>;
3. <http://www.song-en.com.cn/athena/offerdetail/sale/gaozhe234-1039429-872392264.html>;
4. <http://detail.china.alibaba.com/buyer/offerdetail/700573306.html>;
5. <http://detail.china.alibaba.com/buyer/offerdetail/219923602.html>;
6. <http://www.nblaserpointer.cn/athena/offerdetail/sale/cnbeisan-1039429-219923602.html>;
7. [http://www.alibaba.com/product-gs/330355460/Led\\_Magnifier.html](http://www.alibaba.com/product-gs/330355460/Led_Magnifier.html);
8. [http://welkinacc.en.alibaba.com/product/330355460-209738056/Led\\_Magnifier.html](http://welkinacc.en.alibaba.com/product/330355460-209738056/Led_Magnifier.html);
9. [http://www.alibaba.com/product-gs/332908366/Good\\_Quality\\_Cheap\\_Price\\_PVC\\_material.html](http://www.alibaba.com/product-gs/332908366/Good_Quality_Cheap_Price_PVC_material.html);
10. [http://www.alibaba.com/product-gs/308341177/LED\\_card\\_magnifier.html](http://www.alibaba.com/product-gs/308341177/LED_card_magnifier.html);
11. [http://szhaiwang.en.alibaba.com/product/332908366-200808423/Good\\_Quality\\_Cheap\\_Price\\_PVC\\_material\\_LED\\_Magnifier.html](http://szhaiwang.en.alibaba.com/product/332908366-200808423/Good_Quality_Cheap_Price_PVC_material_LED_Magnifier.html);
12. [http://szhaiwang.en.alibaba.com/product/308341177-200808423/LED\\_card\\_magnifier.html](http://szhaiwang.en.alibaba.com/product/308341177-200808423/LED_card_magnifier.html);
13. [http://www.alibaba.com/product-gs/237020081/led\\_magnifier.html](http://www.alibaba.com/product-gs/237020081/led_magnifier.html); and
14. [http://topoptical.en.alibaba.com/product/237020081-200165735/led\\_magnifier.html](http://topoptical.en.alibaba.com/product/237020081-200165735/led_magnifier.html)

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

-2-

15<sup>th</sup> March 2011  
阿里巴巴

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 25<sup>th</sup> March 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 & Y

BENNY KONG & YEUNG, Solicitors

Encl

JC/ el

c.c. client

## Annexure



“Wireless Led Book/Clip Light”  
with model no. H-795XL



“3X / 5X LED Magnifier”  
with model no. H-679



“Wireless Led Task Light”  
with model no. H-620



“Micro Magnifier with LEDs”  
with model no. H-670