



專利、商標及外觀設計註冊代理人  
Agents for Patents, Trade Marks and Designs

DATE : 13<sup>th</sup> January 2012  
OUR REF : 18027-C&D-HP/1211  
YOUR REF :  
REPLY TO : Mr. Benny Kong/ Ms. Elsie Lau  
EMAIL : [elsielau@bk.com.hk](mailto:elsielau@bk.com.hk)

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**BY POST & BY FAX (86-574-65255213)**

NingHai KLED Lighting Factory  
No. 12, Jingong Road,  
XinXing Industry Park,  
Ninghai, Ningbo, Zhengjiang,  
China 315600

Attn: Mr. Kevin Ji

Dear Sir:

**Re: Infringement of Copyright**  
**Respondent: NingHai KLED Lighting Factory**



**Infringing Product:**

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").

A photo featuring our client's Product marked **Annexure A** is enclosed.

Our client is also the registered proprietor of the design registered in the State Intellectual Property Office of the PRC with registration no. ZL 200630010675.0 ("the PRC Registered Design").

The PRC Registered Design is applied to our client's Product.

It has come to our client's attention that you have been offering and/or exposing for sale a LED light product named "Touch light" with model no. CK006 ("the Infringing Product") which is reproduction or contains substantial reproduction of our client's Product.

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13<sup>th</sup> January 2012  
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In particular, you featured photograph of the Infringing Product at your website at [http://pingye.en.china.cn/selling-leads/img\\_1089229746\\_1.html](http://pingye.en.china.cn/selling-leads/img_1089229746_1.html)

Copy of the webpage featuring the Infringing Product marked **Annexure B** is enclosed.

Such unauthorized acts in dealing with the Infringing Product amounts to infringement of copyright. You are demanded to immediately stop all dealings in and with the Infringing Product and to confirm that you will comply with the followings within the next 14 days:-

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 and buyers 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.

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 27<sup>th</sup> January 2012**, 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.

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13<sup>th</sup> January 2012  
NingHai KLED Lighting Factory

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,



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

# **Annexure A**

**Our client's Product named "Wireless Led Task Light"**

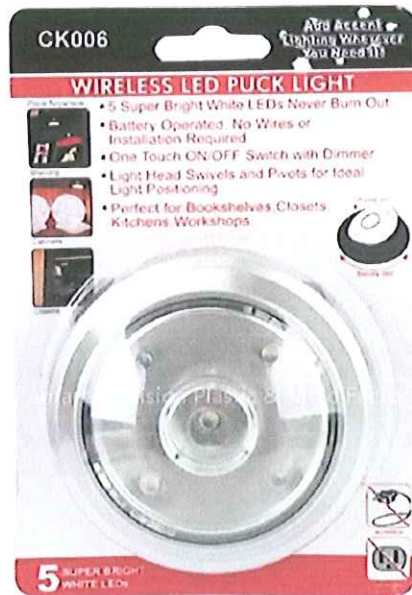
**with model no. H-620**



# **Annexure B**

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## Cabinet Light



**Item Name:** Touch light  
 \*5 Super bright white LEDs never burn out  
 \*Battery operated, no wires or installation required  
 \*Batteries: use 3 x AAA batteries  
 \*One touch ON/OFF switch with dimmer  
 \*Light head swivels and pivots for ideal light positioning  
 \*Function: lighting can be arbitrary rotation;  
 \*Perfect for: bookshelves, closets, kitchens, workshops

### NingHai KLED Lighting Factory Contact Person:

Kevin Ji

**Telephone:**

86-574-65255286

**Country/Region :**

China (Mainland)

**Street Address :**

No.12, Jingong Road,

XinXing Industry Park,

Ninghai,

Ningbo, ZhengJiang, China

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