



date : 5<sup>th</sup> April 2012

email : [infringement@bk.com.hk](mailto:infringement@bk.com.hk)

reply to : Mr. Benny Kong/ Ms. Elsie Lau

our ref : 18905-C&D-HON/312

your ref :

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

香港告士打道160號  
海外信託銀行大廈  
19樓B室

19B, OTB Building  
160 Gloucester Road  
HongKong

**BY POST &**

**BY EMAIL (b2b-ccbu-ipr@alibaba-inc.com)(ipr@alibaba-inc.com)**

Alibaba.com Corporate Headquarters  
699 Wang Shang Road  
Binjiang District  
Hangzhou 310052  
China

t : +852 2519 3567  
f : +852 2519 3610  
e : [enquiry@bk.com.hk](mailto:enquiry@bk.com.hk)  
w : [www.bk.com.hk](http://www.bk.com.hk)

Dear Sirs,

**Re: Infringement of Copyright, Design Patent & Unfair Competition**  
**Respondent: Alibaba.com Corporate Headquarters**

Partners	合夥人
Benny Kong	江炳滔律師
David Tsai	蔡永杰律師
Jennifer Chong	莊敬儀律師
Foreign Lawyer	外地律師
Ada Wang	王燕中國律師



**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 the LED light product named "Wireless Led Task Light" with model no. H-620 ("our client's Product") and the reputation and goodwill in our client's Product.

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

Our client is also the registered proprietor of the below registered designs ("the said Registered Designs"):-

- (A) no. 0802486.9M015 in the Hong Kong Registered Designs Registry; and
- (B) no. ZL 200630010675.0 in the State Intellectual property Office of the People's Republic of China (SIPO).

Our client's Product is manufactured in accordance to the said Registered Designs and/or one/ some of them.

.../2

**BENNY KONG & YEUNG SOLICITORS**



-2-

5<sup>th</sup> April 2012  
Alibaba.com Corporate Headquarters

It came to our client's attention that you have been offering and/or exposing for sale and/or assisting and/or causing one company named "Ningbo Reyda Int'l Economic & Trade Corp. Ltd." to offer and/or expose for sale LED light product named "Press N Click Light" with model no. 182318 ("the Infringing Product") which is a reproduction or contains substantial reproductions of our client's Product.

In particular, you featured photograph of the Infringing Product at a website as per the hyperlinks described below:-

1. [http://www.alibaba.com/product-gs/207968595/Press\\_N\\_Click\\_Light.html](http://www.alibaba.com/product-gs/207968595/Press_N_Click_Light.html); and
2. [http://nbreyda.en.alibaba.com/product/207968595-211949570/Press\\_N\\_Click\\_Light.html](http://nbreyda.en.alibaba.com/product/207968595-211949570/Press_N_Click_Light.html)

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

Such unauthorized acts in dealing with the Infringing Product amount to infringement of copyright and design patent and unfair competition. Our client is entitled to institute Court proceedings against you for injunctions, orders for delivery up and disclosure, legal costs and damages.


You are demanded to **immediately stop** all dealings in and with the Infringing Product and to confirm with us within next 14 days that you will comply with the followings:-

1. **Forthwith delete** the said webpages (and all relevant parts thereof); and
2. **Undertake** to stop dealings in or with the Infringing Product in the future.

Our client will also require you to execute a Deed of Undertaking to the above effect.

Unless you forthwith stop dealing in or with the Infringing Product and confirm your acceptance to the above requests on or before 19<sup>th</sup> April 2012, we shall advise our client to institute Court proceedings against you for injunctions, orders for delivery up and disclosure, legal costs and damages without further notice.

Yours faithfully,



BENNY KONG & YEUNG, Solicitors  
Encl (Annexures A & B)  
BK/el  
c.c. client

# Annexure A

Our client's Product named

"Wireless Led Task Light" with model no. H-620



# **Annexure B**

(The Infringing Product)

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About 99833 results: [LED Lamps \(2010\)](#) , [LED Flashlights \(216\)](#)

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There are **99833 touch light** from at least **4231 suppliers** on Alibaba.com

Related Searches: [touch light](#), [led touch light](#), [torch light](#), [battery led touch light](#), [Wholesale touch light](#)

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### Press N Click Light

Other products by Input Voltage: 12v

FOB Price: [Get Latest Price](#)

Ms. MAGGIE CHEN

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#### Verified Company

**Ningbo Reyda Int'l Economic & Trade Corp. Ltd.**

[ Zhejiang, China (Mainland) ]

[A&V Checked](#)

No substantiated complaints in last 90 days

[Contact Details](#)

[View this Supplier's Website](#)

[See larger image: Press N Click Light](#)

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[Report Suspicious Activity](#)

#### Product Details

#### Company Profile

[Online Showroom: 702 Products](#)

[Other Similar Products from this Supplier](#)

#### Quick Details

Place of Origin: Zhejiang China (Mainland)

Model Number: 182318

Color: any color

Input Voltage: 4.5V

product: press n click light

#### Specifications

Touch Lamp, Screw N Click Light, Press Light, Led Light, 5 LEDs, diameter 88mm, made of plastic, power: 3\*AAA batteries. 3pcs per

Touch Lamp, Screw N Click Light, Press Light, Led Light

1. Bright white led light;
  2. Up to 100 hours of light on.
  3. A single set of batteries.
  4. No tools required;
  5. Peel & Stick back.
  6. 3 different directions light adjustable
  7. 2 grade bright adjustable.
- 5 LEDs touch lamp, diameter 88mm, made of plastic, power: 3\*AAA batteries. 3pcs per pack, 72 packs per ctn.

#### Send your message to this supplier

From:  Enter email or Member ID

To: **Ms. MAGGIE CHEN**  
Ningbo Reyda Int'l Economic & Trade Corp. Ltd.

Message:

Enter your inquiry details such as:

- Self introduction
- Required specifications
- Inquire about price/MOQ

[View sample](#)

Enter between 20 to 8,000 characters.

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5<sup>th</sup> year



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Touch Light



Press N Click Light

Ningbo Reyda Int'l Economic & Trade Corp. Ltd.  
[ Zhejiang, China (Mainland) ]

A&V Checked

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- Promotion Item [13]
- Acrylic Product [36]
- Carabiner [7]
- Flashing Cup [18]

Company Profile

Quality Control

Management

Contact Person



Ms. MAGGIE CHEN

Add to my Contacts

Offline

View Contact Details

### Press N Click Light

Report Suspicious Activity



Press N Click Light

Add to My Favorites

#### Product Details:

Place of Origin	Zhejiang, China (Mainland)
Model Number	182318
Color	any color
Input Voltage	4.5V
product	press n click light

#### Payment & Shipping Terms:

Price: [Get Latest Price](#)

Ms. MAGGIE CHEN

Offline

Contact Supplier

Add to Inquiry Cart

Place Order via

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Next Product >>

#### Detailed Product Description

Touch Lamp,Screw N Click Light, Press Light, Led Light,5 LEDs,diameter 88mm, made of plastic, power:3\*AAA batteries. 3pcs per

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Language Option

Suggestions