



date : 9th May 2012

email : infringement@bk.com.hk

reply to : Mr. Benny Kong/Ms. Karen Poon

our ref : 19180-C&D-HON/512

your ref :

BY POST & EMAIL (ip@jsinfo.net)

Chinanet Jiangsu Province Network
260 Zhongyang Road, Nanjing 210037
No. 31 Jingrong Street
Beijing 100032
China

Dear Sirs,

**Re: Infringement of Copyright & Unfair Competition
Respondent: Chinanet Jiangsu Province Network**



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.

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

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



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9th May 2012
Chinanet Jiangsu Province Network

It has come to our client's attention that you have been adopting and/or assisting and/or causing one company, namely "Ningbo Plus Bright Electrical Co., Ltd" to offer and/or expose for sale and sell product named "5LED PUSH LIGHT" with model no. PB85001 ("Infringing Product") which is reproduction or contains substantial reproductions of our client's product.

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

<http://www.nbgiftexp.com/enProductShow.asp?ID=534>

Screenshot featuring the Infringing Product marked **Annexure B** is enclosed for your reference.

Such unauthorized acts in dealing with the Infringing Product amount to infringement of copyright and unfair competition to which 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 the next 14 days that you will comply with the followings:-

1. **Forthwith delete** the said webpage (or the relevant details 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 23th May 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
Encl (Annexures A & B)
BK/hl
c.c. client

Annexure A
(Our client's Product)



Name: Wireless LED Task Light
Model no.: H-620

Annexure B

(The Infringing Product)

NINGBO PLUS BRIGHT ELECTRICAL CO., LTD
Add: Room 1440-1441,
No. 17 Building, Jiuyu Business Building,
No. 598 Jiangnan Road,
Ningbo, China
Tel.: +86 574 87915100
Fax: +86 574 87915101
E-mail: info@nbqiftexp.com

Products Center

- TV Product(Hot)
- Sensor light
- Solar Light
- Gift Items
- Household Flashlight
- Push Light
- Bicycle Light
- Camping Lantern
- Head Lamp
- Keychain Light
- Dynamo Flashlight
- Working Lamp
- Plastic Torch
- Tent Light
- Daily Item
- Spot Light
- Aluminum Torch



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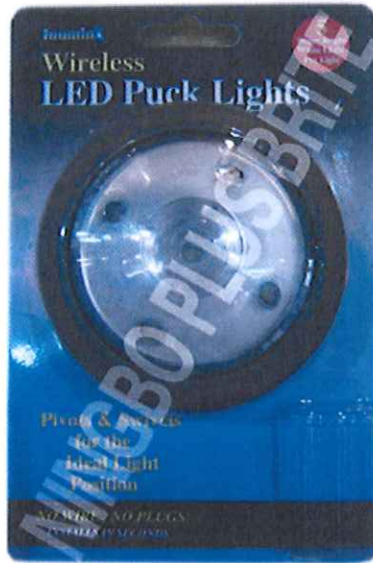
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Product Details



Name: 5LED PUSH LIGHT
Type: Push Light

No. : PB85001
Uptime: 2008-11-1

Specifications

USE 3AAA BATTERY
PACKING: DOUBLE BLISTER

[CLOSE](#)

[PRINT](#)