

Veron Chen (LKKAUTO)

From: Veron Chen (LKKAUTO)
Sent: Wednesday, 27 October 2021 1:59 PM
To: Just Law Claims; SUR; assignments; Guo Qiang (LKKAUTO)
Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy'
Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sir,

Please see our surveyor comments and opinions highlighted in yellow. Note that the parts were all recently replaced before the accident. We have applied a 10% depreciation as the parts are considered to be used parts after installation.

1. AHL Starter Clutch One Way Bearing for Ducati Monster \$40.53 - depreciation -10%: \$36.48
2. Barnett Performance Products Clutch Plate Kit \$227.32 - depreciation -10%: \$204.59
3. Point-of-Sale Transaction RACE WERKS PTE LTD \$675 - not showing any improvement parts
4. USED CLUTCH PUMP/HOLDER \$190 - depreciation -10%: \$171. However this part does not seem to be an improvement from the standard part. This replacement was probably a replacement due to fair, wear and tear.
5. CRANK POSITION SENSOR \$270 - depreciation -10%: \$243. However this part does not seem to be an improvement from the standard part. This replacement was probably a replacement due to fair, wear and tear.

Best Regards,

Veron Chen | Case Handler

LKK Auto Consultants Pte Ltd

Phone: 6256-3561 | email :sur@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Just Law Claims <claims@justlaw.com.sg>
Sent: Wednesday, 27 October 2021 1:02 PM
To: Veron Chen (LKKAUTO) <veronchen@lkkauto.com>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>; Guo Qiang (LKKAUTO) <GuoQiang@lkkauto.com>
Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>
Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sirs,

We refer to your email of 20 October 2021. The Plaintiff's solicitors are pushing this case for AD Hearing and hence, there is urgency and we would be grateful if you could assist on the remaining issues as stated in our email of 19 October 2021 so that we can use it to negotiate.

Thanks & Regards,
Brij Rai / Ambrose Lee

Just Law LLC

101 Cecil Street, #12-12 Tong Eng Building
Singapore 069533
Tel: 6226 1961 | Fax: 6226 2543

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From: Veron Chen (LKKAuto) [<mailto:veronchen@lkkauto.com>]

Sent: Wednesday, 20 October 2021 8:31 am

To: Just Law Claims <claims@justlaw.com.sg>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>; Guo Qiang (LKKAuto) <GuoQiang@lkkauto.com>

Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: ***SPAM*** RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sir,

Our surveyor is reviewing on the matter.

Will get back to you shortly.

Best Regards,

Veron Chen | Case Handler

LKK Auto Consultants Pte Ltd

Phone: 6256-3561 | email :sur@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Just Law Claims [<mailto:claims@justlaw.com.sg>]

Sent: Tuesday, 19 October 2021 3:59 PM

To: Veron Chen (LKKAuto) <veronchen@lkkauto.com>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>; Guo Qiang (LKKAuto) <GuoQiang@lkkauto.com>

Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sirs,

We refer to our email of 15 October 21. There is some urgency to this case. We would appreciate if you could look into the issue of the claim for improvement works for which we have given you the Plaintiff's documents and how it is stated in para 18 of the Plaintiff's AEIC. Kindly help to revert urgently.

Thanks & Regards,

Brij Rai / Ambrose Lee

Just Law LLC

101 Cecil Street, #12-12 Tong Eng Building
Singapore 069533
Tel: 6226 1961 | Fax: 6226 2543

This e-mail contains privileged or confidential information which is intended only for the use of the recipient(s) named above. If you have received this message in error, please notify the sender immediately and delete all copies of it. Thank you.

From: Just Law Claims [<mailto:claims@justlaw.com.sg>]

Sent: Friday, 15 October 2021 1:56 pm

To: 'Veron Chen (LKKAuto)' <veronchen@lkkauto.com>; 'SUR' <sur@lkkauto.com>; 'assignments' <assignments@lkkauto.com>; 'Guo Qiang (LKKAuto)' <GuoQiang@lkkauto.com>

Cc: 'brijrai@justlaw.com.sg' <brijrai@justlaw.com.sg>; 'ambrose@justlaw.com.sg' <ambrose@justlaw.com.sg>; 'vanessa@justlaw.com.sg' <vanessa@justlaw.com.sg>; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sirs,

We refer to your email of 11 October 21. We thank you for your helpful comments. With regard to the claim for improvement to the motorcycle, please note the following:-

1. Para 18 of the Plaintiff's AEIC states how he had incurred the additional expenses at \$1,954.32, **a copy of the affidavit is attached for your easy reference.**
2. **Attached are the exhibits H in support of the claim.**
3. We would appreciate if you could give us your suggestion on the claim for the improvement works and how much do you assess it to be.
4. We would be grateful if you could revert on an urgent basis as this is a small item compared to the bigger claim.

Thanks & Regards,

Brij Rai / Ambrose Lee

Just Law LLC

101 Cecil Street, #12-12 Tong Eng Building

Singapore 069533

Tel: 6226 1961 | Fax: 6226 2543

This e-mail contains privileged or confidential information which is intended only for the use of the recipient(s) named above. If you have received this message in error, please notify the sender immediately and delete all copies of it. Thank you.

From: Veron Chen (LKKAuto) [<mailto:veronchen@lkkauto.com>]

Sent: Monday, 11 October 2021 12:27 pm

To: Just Law Claims <claims@justlaw.com.sg>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>; Guo Qiang (LKKAuto) <GuoQiang@lkkauto.com>

Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sir,

We refer to below email.

- (a) Do you have evidence for the market value at \$4,000 at the time of the accident. If not, do you want to give a revised figure based on documents.

According to surveyor, our MV quoted does not consider the NEA rebate that the owner would be entitled to if the bike was to be de-registered. If we include this entitlement of 3.5K. The MV of the bike can be revise to 7.5K. Please refer to the attached LTA printout.

- (b) What are your comments on the improvement to the motorcycle since the motorcycle was deemed to be total loss.

Typically, any modification, accessories etc are not considered during assessment of MV. Such claims if any should be a separate claim subject to purchase cost and depreciation as a used part. However, if the improvement

works are purely an upgrade of a part that is standard in a motorcycle, like for example a clutch pump and owner changes to an after market brand, then in our opinion, such improvement works should not be claimable in total loss claim. Alternatively, purchase cost of improved part less cost of standard part and thereafter applying depreciation can also be considered purely for settlement basis.

Best Regards,

Veron Chen | Case Handler

LKK Auto Consultants Pte Ltd

Phone: 6256-3561 | email :sur@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Just Law Claims [<mailto:claims@justlaw.com.sg>]

Sent: Monday, 11 October 2021 10:27 AM

To: Veron Chen (LKKAuto) <veronchen@lkkauto.com>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>; Guo Qiang (LKKAuto) <GuoQiang@lkkauto.com>

Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sirs,

We refer to your email of 16 September 2021. We have not received your response. Please note that there is urgency to this case as the Plaintiff's solicitors are pushing for AD Hearing dates. We would be grateful if you could revert urgently as follows:-

- (a) Do you have evidence for the market value at \$4,000 at the time of the accident. If not, do you want to give a revised figure based on documents.
- (b) What are your comments on the improvement to the motorcycle since the motorcycle was deemed to be total loss.

Thanks & Regards,

Brij Rai / Ambrose Lee

Just Law LLC

101 Cecil Street, #12-12 Tong Eng Building

Singapore 069533

Tel: 6226 1961 | Fax: 6226 2543

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From: Veron Chen (LKKAuto) [<mailto:veronchen@lkkauto.com>]

Sent: Thursday, 16 September 2021 5:26 pm

To: Just Law Claims <claims@justlaw.com.sg>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>; Guo Qiang (LKKAuto) <GuoQiang@lkkauto.com>

Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sirs,

Will get back to you shortly.

Best Regards,

Veron Chen | Case Handler

LKK Auto Consultants Pte Ltd

Phone: 6256-3561 | email :sur@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Just Law Claims [<mailto:claims@justlaw.com.sg>]

Sent: Wednesday, 15 September 2021 5:54 PM

To: Veron Chen (LKKAuto) <veronchen@lkkauto.com>; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>

Cc: brijrai@justlaw.com.sg; ambrose@justlaw.com.sg; vanessa@justlaw.com.sg; 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>

Subject: RE: (URGENT) SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

Dear Sirs,

We refer to the email communications between China Taiping Insurance and your good self. Please note the following:-

1. China Taiping Insurance had engaged LKK to conduct re-inspection of the Third Party's vehicle. LKK had issues a report dated 15 October 2018 and recommended that the Plaintiff's motorcycle was not economical to repair. The net loss was assessed at **\$2,936** (MV \$4,000 – rebate \$1,064).
2. The Plaintiff's surveyor / Pro-option had recommended total loss at about **\$6,933** (MV \$8,000 – rebate \$1,067).
3. The Plaintiff also claims that before the accident, he had done improvement to the motorcycle and is claiming for the improvement works at \$1,954.32.
4. China Taiping Insurance wants you to revert on the following:-
 - (a) Do you have evidence for the market value at \$4,000 at the time of the accident. If not, do you want to give a revised figure based on documents.
 - (b) What are your comments on the improvement to the motorcycle since the motorcycle was deemed to be total loss.
5. There is some urgency in this case because the Property Damage is small but the larger Personal Injury claim is being settled but we cannot conclude because of the PD claim. Hence we would appreciate your urgent response.

Thanks & Regards,

Brij Rai / Ambrose Lee

Just Law LLC

101 Cecil Street, #12-12 Tong Eng Building

Singapore 069533

Tel: 6226 1961 | Fax: 6226 2543

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From: Veron Chen (LKKAuto) <veronchen@lkkauto.com>
Sent: Tuesday, 14 September 2021 5:02 PM
To: Tan Kian Wei Billy <billy.tan@sg.cntaiping.com>; SUR <sur@lkkauto.com>
Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Just Law Claims <claims@justlaw.com.sg>
Subject: RE: RE : SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Billy,

Survey report submitted in merimen.

Best Regards,

Veron Chen | Case Handler

LKK Auto Consultants Pte Ltd

Phone: 6256-3561 | email :sur@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Tan Kian Wei Billy [<mailto:billy.tan@sg.cntaiping.com>]
Sent: Tuesday, 14 September 2021 4:54 PM
To: SUR <sur@lkkauto.com>
Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Just Law Claims <claims@justlaw.com.sg>
Subject: RE : SNM18D03554/C02/FT4448P - Date of Accident : 18/07/2018 00:00 - Survey report

[Confidential]

Hi LKK,

Kindly assist in the survey report for the above mention case as we need the report urgently for settlement for the PD claim.

Thanks.

NOTICE :

In response to the escalating Covid-19 cases, please refrain from sending hardcopy documents to us as delay is to be expected for handling hardcopy documents. All correspondence should be made via email claimsdept@sg.cntaiping.com or fax at [6224 7175](tel:62247175). Any inconvenience caused is much regretted.

Thanks and Best Regards

Billy Tan
Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.
3 Anson Road #15-00 Springleaf Tower Singapore 079909
DID: (65) 63896175 | F: (65) 62247175

W: www.sg.cntaiping.com | **FB:** www.facebook.com/chinataipingsg/ | **WeChat:** 太平獅城 Taiping SG

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From: Veron Chen (LKKAuto) [<mailto:veronchen@lkkauto.com>]
Sent: Friday, 30 April 2021 5:31 pm
To: ambrose@justlaw.com.sg; SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>
Cc: 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>; 'Claims Dept of CTI' <claimsdept@sg.cntaiping.com>; 'Brij Raj Rai' <brijrai@justlaw.com.sg>; vanessa@justlaw.com.sg; claims@justlaw.com.sg; Guo Qiang (LKKAuto) <GuoQiang@lkkauto.com>
Subject: RE: DC 772/2019 | CTI REF: SNM18D03554C04 Just Law Ref: BRR/AL/8044/19 | Veh no: FT 4448P

Dear Ambrose,

Will check and revert.

Best Regards,

Veron Chen | Case Handler

LKK Auto Consultants Pte Ltd

Phone: 6256-3561 | email :sur@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: ambrose@justlaw.com.sg <ambrose@justlaw.com.sg>
Sent: Friday, 30 April 2021 5:17 PM
To: SUR <sur@lkkauto.com>; assignments <assignments@lkkauto.com>
Cc: 'Tan Kian Wei Billy' <billy.tan@sg.cntaiping.com>; 'Claims Dept of CTI' <claimsdept@sg.cntaiping.com>; 'Brij Raj Rai' <brijrai@justlaw.com.sg>; vanessa@justlaw.com.sg; claims@justlaw.com.sg
Subject: DC 772/2019 | CTI REF: SNM18D03554C04 Just Law Ref: BRR/AL/8044/19 | Veh no: FT 4448P

Dear Mr Xing Guo Qiang / Mr Veron Chen,

We act for China Taiping Insurance (Singapore) Pte Ltd, the insurers of motor car no. SJN 261X. We have been appointed to handle the defence of the claim by the owner/driver of the motorcycle no. FT 4448P ("Plaintiff's motorcycle").

You have been appointed by China Taiping to inspect the Plaintiff's motorcycle and your Mr Xing Guo Qiang had carried out the inspection on 15 Oct 2018 at SBR Motors. **A copy of your inspection report is attached.**

LKK had recommended that the Plaintiff's motorcycle is not economical to repair and based on the computation, total loss would be **\$2,936** (MV \$4,000 – rebate \$1,064).

On the other hand, the Plaintiff's surveyors from Pro-option had recommended total loss at about **\$6,933**. They are also claiming for cost of repairs at **\$1,954.32**. **Copies of the various invoices / receipts, Pro-option's survey report and photographs are attached for your viewing.**

The Plaintiff's solicitors disagreed with your recommendation on the grounds that the market value assessed at \$4,000 for such a motorcycle is too low. Based on the Plaintiff's survey report, please let us know whether you will be willing to consider revising your assessment for purposes of negotiation. Alternatively, could you also let us know how the market value of \$4,000 was worked out.

Kindly note that the claims handler from CTI, Mr Billy Tan, is copied in this email.

Please reply.

Regards,

Ambrose Lee / Brij Rai

Just Law LLC

101 Cecil Street, #12-12 Tong Eng Building

Singapore 069533

Tel: 6226 1961 | Fax: 6226 2543

HP: 9773 0392

Note: In view of the COVID-19 situation, and to comply with the regulations to work-from-home, kindly communicate with us by email, if possible.

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