

REF:

C45170

ASSIGNMENT

From _____ Date: _____
 Estimated Cost: _____
 OD / TP / WS / TP RES / OD RES / EVA / INV / MV

To inspect Vehicle No: _____

at Workshop n/s _____

of _____

Insured: _____

Policy No: _____

Claims No: _____

Sum Insured: _____

Excess: _____

(Client's Record)

Make of Veh: _____

(Policy Condition)

Remark: The veh had commenced its
 repair at the time of inspection.

N/S	O/S

Bal. or Market Value: _____

IDAC Accident Report: _____

Consistent? : Yes or No

GIA / PR Seen: _____

Consistent? : Yes or No

Est. Repairs: _____

4

days

Res: Yes or No

Lum Sum: _____

20

%

3 Val: Yes or No

CA / REV / REP. / 24 HRS

Vehicle: IN / OUT

Date: _____

Person Contacted: _____

Veh No: _____

GBC 1458S

Vt Reg: _____

24 Jun 2011

Type: M.Car / M.Cycle / Bus / Van / Car / Taxi / Prime Mover /

Truck / Trailer or _____

Make: _____

Nissan Cabstar

CC

2853

Colour: _____

Silver

A/C: Insured / Std / NI / NA

Sp. Reading: _____

247146

T/Ratio: Insured / Std / NI / NA

Eng/No: _____

C/No: _____

JN/SC2F2480850004

Gen. Cond: Good / Fair / Poor / Burnt

Steering: In order / Jammed / Leaked / Burnt or

Brake: In order / Jammed / Leaked / Burnt or

Modi: Nil / S/Rim / STD A/Rim or

Tyre Size: _____

F: _____

195 R15

R: _____

165 R13

BSY DUN / EXNOVA / GY / FS / LIZA / MIC / OHTSU / PIR / SUMI /

TOYO / YOKO or _____

Front

Rear

R/Bal: _____

5

mm

R/Bal: _____

5

mm

L/Bal: _____

5

mm

L/Bal: _____

5

mm

D.O.A. _____

D.O.L

16-05-19 2:00pm

Survey held at _____

D/K 4024 AMK Ind PK / H01-311

Des. of Damages: Frt / Rear / O/S / N/S / U/C / Rooftop or

N/S Int.

The U/C / Chassis frame / Body Structure affected due to collision.

Date / Time

Action / Instruction

Date/Time, File Pass to?

☐

: Preli. Report

1)

☐

: Final Report

Date/Time, File Return to?

2)

Days Of Repair: _____

Resurvey No. of Trip: _____

Add Fee: _____

☐

Site Insp (\$

☐

Interview (\$

☐

Tech. Invs (\$

☐

Weekend (\$

Survey Fee: _____

Transportation: _____

) G + PR. \$

) Photos

) Others

TOTAL

Report Format :

Lump Sum / I.B.I.: (\$

[Signature]
 17/5/2019

Nivitha (LKK Auto)

From: Catherine Lim LLC <info@catherinelimllc.com>
Sent: Friday, 10 May 2019 10:57 AM
To: Admin-D (LKKAuto); 'Tan, Jayna'
Cc: 'B Kasman, Azmi'; assignments
Subject: Re: Nomination for SJE - MC Suit No. 18855 of 2017; Our ref: PYK/YHT/KW00007.2135 (abk) [W-KW.FID150465]

Dear Sir / mdm,

Below is the reinspection details

Date: 16.05.2019 (Thursday)

Time: 11am - 1pm

Location: Blk 4024 Ang Mo Kio Ind Park 1
#01-311 Singapore 569635

Contact: 9004 1056 Kariton

Regards,
Catherine Lim LLC

From: Admin-D (LKKAuto)
Sent: Thursday, May 09, 2019 6:34 PM
To: 'Tan, Jayna'; info@catherinelimllc.com
Cc: 'B Kasman, Azmi'; assignments
Subject: RE: Nomination for SJE - MC Suit No. 18855 of 2017; Our ref: PYK/YHT/KW00007.2135 (abk) [W-KW.FID150465]

Dear Catherine,

Kindly assist to provide us the venue and time for the Re-inspection.

Best Regards,

G.Nivitha | Admin

LKK Auto Consultants Pte Ltd

Phone: 6841-1972 | email: assignments@lkkauto.com | fax: 6256-4315

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

From: Admin-D (LKKAuto) [mailto:admin-d@lkkauto.com]
Sent: Thursday, 2 May 2019 4:31 PM

Nivitha (LKK Auto)

From: Tan, Jayna <JaynaTan@witherskhattarwong.com>
Sent: Friday, 26 April 2019 10:29 AM
To: 'Admin-D (LKKAuto)'
Cc: B Kasman, Azmi; assignments; 'info@catherinelimllc.com'
Subject: RE: Nomination for SJE - MC Suit No. 18855 of 2017; Our ref: PYK/YHT/KW00007.2135 (abk) [W-KW.FID150465]
Attachments: 0680_001.pdf; KW00007.2135 - AFFIDAVIT_OF_EVIDENCE_IN_CHIEF_(STIPP_WERNER).pdf; KW00007.2135 - AFFIDAVIT_OF_EVIDENCE_IN_CHIEF_(Tan_Kiam_Hock).pdf

opened

KW Ref: PYK/YHT/KW00007.2135
P's Ref: CL/170432-T-MCS/gh

MC SUIT NO. 18855 OF 2017 ACCIDENT INVOLVING GBC 1458S AND FBJ 8554P ALONG PIONEER CRESCENT ON 12 APRIL 2017

Dear Sirs,

We are pleased to inform you that parties have agreed to appoint Mr. Xing Guo Xiang as the single joint expert for this matter pursuant to Order 108 Rule 5(3) of the Rules of Court.

The Court has given directions for this matter to be set down for an unbifurcated trial on liability and quantum. In light of the foregoing, **we will be most grateful if you could let us have your single joint expert report within 3 weeks of the date hereof, i.e. 17 May 2019.**

Kindly proceed to liaise with the Plaintiff's solicitors to arrange for a re-inspection of the Plaintiff's vehicle no. GBC 1458S and keep us copied in the same. The Plaintiff's solicitors have been copied into this e-mail for your easy reference.

In the meantime, kindly find a copy of the following documents for your reference and perusal:

1. Plaintiff's Affidavit of Evidence in Chief;
2. Defendant's Affidavit of Evidence in Chief;
3. Survey report on GBC 1458S by FormTeam Consultancy Pte Ltd; and
4. Survey report on GBC 1458S by Allied Auto Appraisal

We look forward to hearing from you.

Thank you.

Yours faithfully,

Jayna Tan
Legal Associate
Litigation
t +65 6238 3104 m +65 9759 7054
witherskh@wide.com

Withers KhattarWong LLP
80 Raffles Place, #25-01 UOB Plaza 1 Singapore 048624



From: Admin-D (LKKAuto) [mailto:admin-d@lkkauto.com]
Sent: Tuesday, April 9, 2019 2:27 PM
To: Tan, Jayna <JaynaTan@witherskhattarwong.com>
Cc: B Kasman, Azmi <Azmi@witherskhattarwong.com>; assignments <assignments@lkkauto.com>
Subject: RE: Nomination for SJE - MC Suit No. 18855 of 2017; Our ref: PYK/YHT/KW00007.2135 (abk) [W-KW.FID150468]

Dear Jayna,

Thank you for the email.

Attached herewith CV of our surveyor Mr Xing Guo Qiang for your attention.

Our surveyor needs approximately three to four weeks to complete the report.

We are pleased to submit our Professional Fee Charges (Single Joint Expert) as follows:

Paper Survey - \$700.00

Physical Re-inspection - \$1,000.00

Court Attendance Expert Witness Fee

(a) State Courts

i) Half day \$400.00

ii) Full day \$800.00

All above charges are subject to GST 7%.

Best Regards,

G.Nivitha | Admin

LKK Auto Consultants Pte Ltd

Phone: 6641-1972 | email: assignments@lkkauto.com | Fax: 6641-4913

Blk 51, Pava Ubi Industrial Park, Ubi Avenue 1, #04-25 | Singapore

From: Tan, Jayna [mailto:JaynaTan@witherskhattarwong.com]

Sent: Friday, 5 April 2019 6:51 PM

To: 'admin-d@lkkauto.com' <admin-d@lkkauto.com>

Cc: B Kasman, Azmi <Azmi@witherskhattarwong.com>

Subject: Nomination for SJE - MC Suit No. 18855 of 2017; Our ref: PYK/YHT/KW00007.2135 (abk) [W-KW.FID150468]

Your ref: To be advised

Our ref: PYK/YHT/KW00007.2135 (abk)

Dear Sirs,

MC SUIT NO. 18855 OF 2017

ACCIDENT INVOLVING GBC 1458S AND FBJ 8554P ALONG PIONEER CRESCENT ON 12 APRIL 2017

We act for NTUC Income Insurance Co-operative Limited, motor insurers of the motorcycle no. FBJ 8554P, and refer to the above matter.

We have been instructed by our clients to nominate one of your surveyors from LKK Auto Consultants Pte Ltd as the Single Joint Expert ("SJE") surveyor for this matter, pursuant to Order 108 Rule 5 of the Rules of Court.

We will therefore be most grateful if your good office could select one surveyor for us to nominate as the SJE for this matter.

In this regard, we will be most grateful if you could provide us with the following in respect of the said selected surveyor:

1. Full name and NRIC number;
2. A copy of the surveyor's CV;
3. Professional charges of the said surveyor, including costs of producing the SJE report and full and half day Court attendances fees; and
4. The estimated time required for the SJE report to be produced.

Kindly note that the Plaintiff's motor truck no. GBC 1458S was repaired at MCS Auto.

We look forward to your response.

Thank you.

Yours faithfully,

Jayna Tan
Legal Associate
Litigation
t +65 6238 3104
[withersworldwide.com](mailto:jayna@withersworldwide.com)

Withers KhattarWong LLP
80 Raffles Place, #25-01 UOB Plaza 1, Singapore 048624



Withers KhattarWong LLP - 80 Raffles Place, #25-01 UOB Plaza 1, Singapore 048624, T: +65 6535 6844 F: +65 6534 4892

Withersworldwide
London, Cambridge, Geneva, Milan, Paris, Melbourne, Sydney, Hong Kong, Singapore, Tokyo, British Virgin Islands, New York, Greenwich, New Haven, San Francisco, Los Angeles, San Jose, Santa Fe, San Diego

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Withers KhattarWong LLP - 80 Raffles Place, #25-01 UOB Plaza 1, Singapore 048624, T: +65 6535 6844 F: +65 6534 4892

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FormTeam Consultancy Pte Ltd

No.33, Ubi Ave 3
#02-15, Vertex
Singapore 408668

Tel: (65) 6509 1355
Fax: (65) 6509 6221

Email: automsurvey@fta.com.sg

Co.Reg No: 200819280D

GST Reg No: 200819280D

Our Reference : RRN17-042032/PRS/AL/ADJ/AL/gh

Your Reference: MT/0941321-002

Date : 08-Jun-2017

Motor Claims Department
NTUC Income Insurance Co-operative Limited
73 Bras Basah Road
#05-01 NTUC Trade Union House
Singapore 189556

Attention : Mr Marcus Xiao

Dear Sir/Mdm,

SURVEY OF VEHICLE NO. GBC 1458S

Pursuant to your instruction on **01-June-2017**.

We recommend a repair cost of **\$1,050.00** (see report) based on lump sum repair and the estimated duration of repairs would take **03 days**.

We also enclosed our note of charges for your consideration.

Thank you for this assignment.

Your faithfully

FormTeam Consultancy Pte Ltd
Adjusters & Surveyors (Licensed Appraiser)



Axel Lee
Automobile Appraiser

(Email: axeller@fta.com.sg)

Encl. Survey Report



FormTeam Consultancy Pte Ltd

AUTOMOBILE ASSESSMENT REPORT

Page No. 1

Our Reference : RKN17-042032/PRS/AL/ADJ/AL/gh

Your Reference: MT/0941321-002

Date : 8-Jun-17

Attention : Mr Marcus Xiao

TO : Motor Claims Department
NTUC Income Insurance Co-operative Limited
73 Bras Basah Road
#05-01 NTUC Trade Union House
Singapore 189556

Assessment of Vehicle No : GBC 1458S
Date of Accident : 12-April-2017
Date of Inspection : 18-April-2017
Address of Inspection : 176 Sin Ming Drive #05-09 Autocare Singapore 575721

We have carried out a physical assessment of **GBC 1458S** at M/S Wahyu Automotive Body Work according to your instructions on **17-April-2017**, dismantled items **not called-2017**, post repair survey on **19-May-2017** and are pleased to submit our report herewith.

1. VEHICLE PARTICULARS

Registration No. : GBC 1458S
Make & Model : Nissan Cabstar
Year of Registration : 2011
Engine Capacity : 2953 cc
Chassis No. : JN1SC2F24Z0850004
Engine No. : ZD3028373K
Colour : Silver
Mileage (km) : 180075

2. VEHICLE CONDITION

Body Paint : Good
Steering : Serviceable
Foot Brake : Serviceable
Parking Brake : Serviceable

3. TYRE PARTICULARS & CONDITION

Front

RH Make/Size : Bridgestone 195R15 - 60%
LH Make/Size : Bridgestone 195R15 - 60%

Rear

RH Make/Size : Yokohama 155R13 - 60%
LH Make/Size : Yokohama 155R13 - 60%

Note : % denotes the remaining percentage of the tyre

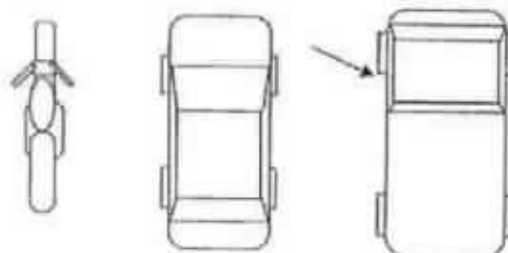
FormTeam Consultancy Pte Ltd

Our Reference : RRN17-042032/PRS/AL/ADJ/AL/gh
Your Reference : MT/0941321-002
Vehicle Number : GBC 1458S

Page No. 2

4. DESCRIPTION OF DAMAGE

At the time of inspection, this vehicle sustained damages to the **N/S Front** portion. Please see attached scheduled for details.



5. REMARKS

Market Value : -
Salvage Value : -
Repair Limit (Nett Loss) : -
Repairer's estimate : **Not Provided**
Nett Saving : -
Excess : -
Sum Insured : -
Our adjusted amount : \$ 1,050.00
Estimated Repair Days : 03 days

Additional photographs will be submitted upon request by our principal.

Pursuant to your instruction, we have **NOT AUTHORIZED** repair.

The assessment was conducted on a **"Without Prejudice"** basis.

If we are not notified of anything to the contrary within **14 days** from the date hereof, this report shall be treated as correct.

Disclaimer

This report is intended for the exclusive use of the addressee solely in relation to the loss occurrence in which the assessed vehicle is involved. No liability or responsibility whatsoever shall be held by

FormTeam Consultancy Pte Ltd for any reliance on this report by any third party, unless with the permission of the addressee.

FormTeam Consultancy Pte Ltd

Our Reference : RRN17-042032/PRS/AL/ADJ/AL/gh
 Your Reference : MT/0941321-002
 Vehicle Number : GBC 1458S

Page No. 3

QTY	DESCRIPTION	CONDITION	REPAIRER'S ESTIMATE (\$)	OUR ASSESSMENT (\$)
PARTS (LIST ITEMS)				
1	Front Corner Panel N/S	Badly Dented	-	437.00
			-	437.00
		Less Discount :	0%	30%
		Parts Total :	-	131.10
			-	305.90
PARTS (NETT ITEMS)				
1	Front Slit Cover N/S	Holder Broken	-	23.30
1	Front Corner Panel Protector N/S	Necessary	-	4.00
1	Front door Upper Hinge N/S	Bent/Twisted	-	56.40
1	Front Door Lower Hinge N/S	Bent/Twisted	-	56.40
1	Front Door Lower Weatherstrip N/S	Torn	-	22.90
8	Front Door Lower Weatherstrip Clip N/S	Necessary	-	9.60
			-	172.60
		Less Discount :	0%	10%
		Parts Total :	-	17.26
			-	155.34
SPECIAL NETT ITEMS				
1	Front Door Company Details Label N/S	Necessary	-	40.00
		Special Nett Total :	-	40.00
		Parts Total :	-	501.24

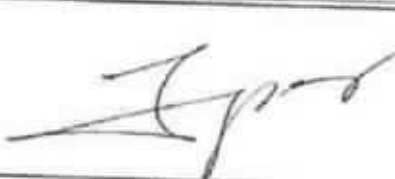
FormTeam Consultancy Pte Ltd


Our Reference : RRN17-042032/PRS/AL/AL/AL/gh
Your Reference : MT/0941321-002
Vehicle Number : GBC 1458S

Page No. 4

S/N	DESCRIPTION	REPAIRER'S ESTIMATE (S\$)	OUR ASSESSMENT (S\$)
LABOUR			
1	To rewire front portion and refocus headlamp beam.	-	30.00
2	To remove, cut out damage portion, jack out, straighten, panel beating, welding, align and renew replaced parts.	-	400.00
3	To putty and respray painting on affected areas.	-	400.00
Labour Total :		-	830.00
TOTAL (PARTS & LABOUR) :		-	1,331.24

The final adjusted Lump Sum contract amount is **\$1,050.00**
(SINGAPORE DOLLARS ONE THOUSAND AND FIFTY ONLY)


Frankie Pang
AMSAE(AUST), AMIRTE, AMSOE,
MASPACI, MSAAA
Licensed Appraiser


Axel Lee
Automobile Appraiser

Allied

Auto Appraisal

Our Ref : 17/0040/TP
Your Ref : Not Advised

Date: 17 April 2017

M/s Fine Air Engineering Pte Ltd
C/o 1100 Serangoon Road
Singapore 328195

ACCIDENT DAMAGED VEHICLE INSPECTION REPORT (WITHOUT PREJUDICE)

Detailed accounts of our inspection are as follows:

(1) REFERENCE

Name of Claimant	: M/s Fine Air Engineering Pte Ltd	Date of Request	: 17 April 2017
Policy Number	: 5081319221	Referred By	: Insured
Claim Number	: Not Advised	Date of Inspection	: 17 April 2017
Accident Date	: 12 April 2017	Date of Re-inspection	: 19 May 2017
Repairer	: MCS Auto	Sum Insured	: Not Applicable
	1100 Serangoon Road	Excess Amount	: Not Applicable
	Singapore 328195	3 rd Party Vehicle	: FBJ 8554 P
		3 rd Party Insurer	: NTUC Income Insurance Co-operative Limited

(2) PARTICULARS OF VEHICLE

Registration Number	: GBC 1458 S	Mileage	: 180,075 km
Make & Model	: Nissan Cabstar 3.0 (M)	Chassis Number	: JN1SC2F24Z0850004
Date of Registration	: 24 June 2011	Engine Number	: ZD30283737K
Colour	: Silver	Engine Capacity	: 2,953 cc

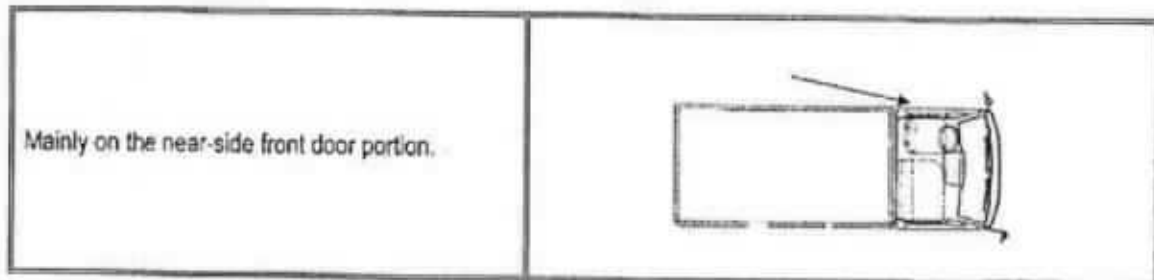
(3) PRE-ACCIDENT CONDITION (STATIC TEST ONLY)

Steering	: In order	Paint Work	: Good
Foot-brake	: In order	Modification	: Nil
Hand-brake	: In order	General Condition	: Good

(4) TYRE CONDITION

	Remaining Thread Depth (%)	Make	Size
Front right tyre	90%	Bridgestone	195R15C 8PR
Front left tyre	90%	Bridgestone	195R15C 8PR
Rear right tyre	90%	Yokohama	155R13 8PR
Rear left tyre	90%	Yokohama	155R13 8PR

(5) POINT OF IMPACT



(6) GENERAL DESCRIPTION OF DAMAGES

The impact of the collision has damaged/affected the left front door, left front side body panel, left front corner panel and etc.

Please refer to the Annex for a detailed account of the damages and photographs taken.

(7) RECOMMENDATION

We have inspected thoroughly the actual damages found on the vehicle before we conclude as to whether the parts needed replacement or repairs. The estimated cost of repair submitted by the repairer is \$5,681.30. We have adjusted the cost to \$3,808.72 and recommend that the repairs to be taken on a lump sum basis of \$3,050.00. In our opinion, the damaged parts are consistent with that caused by the accident.

(8) REMARKS

We have not authorised the repairs. However, for information, under normal circumstances, the period of repair should not exceed 4 working days.

This inspection was conducted on a "Without Prejudice" basis.

We are pleased to advise that the inspection work was carried out accordingly, and hereby submit our Appraisal Report and photographs.

Allied Auto Appraisal

A circular stamp with the text "ALLIED AUTO APPRAISAL" around the perimeter. Inside the stamp, there is a signature.

H. C. Ng
Motor Vehicle Appraiser

ANNEX

REPAIR DETAILS (GBC 1458 S)

Recommended Parts

No	Qty	Particulars	Condition	Repairer's Amount	Adjuster's Amount
1	1	Front Corner Panel - N/s	Badly Dented	437.00	437.00 ✓
2	1	Front Side Body Panel - N/s	Dented - To Repair	1,845.50	0.00
3	1	Front Door Assembly - N/s	Dented/Buckled	1,696.40	1,696.40 X Repair
				3,978.90	2,133.40
			Less 30%	1,193.67	640.02
			Sub-Total	2,785.23	1,493.38 305.9
Nett Items					
4	1	Front Slit Cover - N/s	Holder Broken	23.30	23.30 ✓
5	1	Front Corner Panel Protector - N/s	Necessary	4.00	4.00 ✓
6	1	Front Door Upper Hinge - N/s	Bent/Twisted	56.40	56.40 ✓
7	1	Front Door Link Stopper - N/s	Serviceable	39.70	0.00 NN
8	1	Front Door Lower Hinge - N/s	Bent/Twisted	56.40	56.40 ✓
9	1	Front Door Lower Weather-strip - N/s	Torn	22.90	22.90 ✓
10	8	Front Door Lower Weather-strip Clip - N/s @\$1.20 each	Necessary	9.60	9.60 ✓
				212.30	172.60
			Less 10%	21.23	17.26
			Sub-Total	191.07	155.34 ✓
Special Nett Item					
11	1	Front Door Inner Sealant - N/s	Necessary	80.00	60.00 X NN
12	1	Front Door Company Details Label - N/s	Necessary	45.00	40.00 ✓
Total Parts (S\$)				3,101.30	1,748.72

Recommended Labour

No	Particulars	Repairer's Amount	Adjuster's Amount
1	To panel beat and repair left front side body panel including replacement of the left front door damaged parts.	1,400.00	1,050.00 400
2	To transfer left front door locking mechanism and other components to new door panel include checking components for function.	120.00	80.00 X NN
3	To check front lightings and electrical wiring systems include focusing both headlights and adjust if necessary.	80.00	50.00 30
4	To putty and re-spray painting on left front slit cover, left front corner panel, left front side body panel and left front door.	900.00	840.00 60
5	Rust-proofing on the left front accident affected portions.	80.00	40.00 X NN
Total Labour (S\$)		2,580.00	2,060.00 830

Total Repair Cost (S\$) **5,681.30** **3,808.72**

Adjusted Repair Cost (Lump sum basis)

S\$3,050.00

1331.24

20% of 1050

SINGAPORE ACCIDENT STATEMENT

IMPORTANT NOTICE

1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Authorised Driver.
3. Information provided must be as truthful and accurate as possible. Any wilful misrepresentation or withholding of material facts may allow insurance companies to repudiate policy ability.
4. The issue and acceptance of this Form by insurance companies is not an admission of policy liability on the part of the insurance companies.
5. Any false reporting may be referred to the Police for investigation.
6. This report will be forwarded by the Insurers of the insurers of the GIA Records Management Centre established by the General Insurance Association of Singapore (GIA) for archiving and that copies of this report will for a fee be made available upon application by interested parties.
7. By the lodgement of this report to the insurers, you hereby consent to the archiving of this report at the centre and to copies of the report being made available aforesaid.

ACCIDENT STATEMENT

Date Of Report	13/04/2017 14:34
Date Of Accident	12/04/2017 10:00
Exact Location Of Accident	PIONEER CRESCENT JUST BEFORE & OUTSIDE - NO. 10
Country/State of Loss	SINGAPORE

DETAILS OF OWN VEHICLE

Vehicle Registration Number	FBJ8554P
Insured/Policyholder	
Name Of Registered Owner	STIPP WERNER
Passport No/FIN	G3184524L
Email Address	WERNER.STIPP@GMAIL.COM
Mobile Phone No	(LOCAL) +65-92728524
Alternative Phone No	OFFICE-64224009

Vehicle Particulars

Manufacturer	KTM
Model	200 RC
Exact Purpose for which vehicle was being used at time of accident	PRIVATE USE
Are you claiming under your own insurance policy for repair to your vehicle?	NO
If No, Please state action to be taken	THIRD PARTY
Vehicle Category	MOTORCYCLE

Insurance Company

Name of Insurance Company	NTUC INCOME INSURANCE CO-OPERATIVE LTD
Type Of Coverage	COMPREHENSIVE
Fleet Policy	NO
Policy Number	5077204262
Cover Note Number	

Driver

Name of Driver	STIPP WERNER
Passport No/FIN	G3184524L
Date Of Birth	28/10/1976
Occupation	INDOOR
Date Of Driving Pass	12/07/2016
Driving Experience	0 YEAR AND 9 MONTH
Gender	MALE
Mobile Number	(LOCAL) +65-92728524
Fax Number	
Contact Number	OFFICE-64224009
Email Address	WERNER.STIPP@GMAIL.COM

Address	NO : 31 BUKIT BATOK EAST AVE 6 #02-03
Postcode	859763
Was driver an employee of the Insured's Company	NO
If No, Relationship of the Driver with the Insured	OWNER
Vehicle Registration Number of Driver's Own Vehicle	-
	-
	-
Insurance Company of Driver's Own Vehicle	-
	-
	-

General Information of the Accident

Type Of Accident	UNKNOWN - TP VEHICLE LEFT FRONT DOOR SUDDENLY OPEN
Weather Conditions	AFTER RAIN
Road Surface	WET

Other Information

Was any foreign vehicle involved in this accident?	NO
Was any body injured in the Accident?	YES
Was any other material or property damaged?	YES
I have been approached by unknown person(s) soliciting/offering accident claims assistance.	NO
Number of Passengers (Including Driver)	1

Details of Police Action

Was the accident reported to the police?	NO
If Yes, Please state which Police Station	
Was notice of intended Prosecution given?	NO
If Yes, against whom?	

Circumstances of Accident

REFER ATTACHED

Attachment(s)

Are accident photos available for attachment?	YES
Was there any video captured by Car Camera?	NO
Was there any audio recorded?	NO

DETAILS OF OTHER VEHICLE PROPERTY 1

Vehicle Registration Number	GBC1458S
Vehicle Make/Model/Colour	LORRY
Details Of Properties	LEFT FRONT DOOR
Name of Driver	TAN KIAM HOCK
NRIC/Passport Number	S2673281F
Contact Number	98391945
Address	
Postcode	
Insurance Company Name	
Nature Of Damage	
No. Of Passenger (Including Driver)	

Details of Witness

Name	
Phone Number	
Email Address	

DETAILS OF INJURED PERSON 1

Name	STIPP WERNER
Approximate Age	

Injuries Sustain	REFER REPORT
Injured person in which vehicle?	FBJ8554P
Were seat belts worn?	NO
Was injured conveyed to hospital by ambulance?	NO
Address	NO :31 BUKIT BATOK EAST AVE 6 #02-03
Postcode	659763

Sketch Plan

SKETCH PLAN

IMPORTANT NOTICE

1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Authorised Driver.
3. Information provided must be as truthful and accurate as possible. Any wilful misrepresentation or withholding of material facts may allow insurance companies to repudiate policy liability.
4. The issue and acceptance of this Form by insurance companies is not an admission of policy liability on the part of the insurance companies.
5. Any false reporting may be referred to the Police for investigation.
6. The report will be forwarded by the insurers of the GIA Records Management Centre established by the General Insurance Association of Singapore (GIA) for archiving and that copies of this report will for a fee be made available upon application by interested parties.
7. By the lodgement of this report to the insurers, you hereby consent to the archiving of this report at the centre and to copies of the report being made available aforesaid.

8. Consent under the Personal Data Protection Act (PDPA)

I understand, acknowledge, agree and consent that:

(a) My insurer, my workshop and the General Insurance Association of Singapore ("GIA") may/are permitted to collect, use, disclose and/or process my personal data/personal information set out in this [Form] and any other personal information provided by me or possessed by my insurer (collectively the "Personal Information") and disclose and transfer such Personal Information to all insurer(s) who have insured vehicle(s) involved in the accident (all insurer(s) who have insured vehicle(s) involved in this accident shall be collectively referred to as the "Insurers"), the Insurers' law yers/law firms, the Monetary Authority of Singapore and any relevant government agency/authority (such as the police), for the purpose(s) of:

(i) processing, handling and/or dealing with my claims including the settlement of the claims and any necessary investigations relating to the claims;

(ii) investigating the accident and/or my claims;

(iii) carrying out and/or dealing with my instructions or responding to any enquiries by me;

(iv) administering my claims (including the mailing of correspondence, statements, invoices, reports or notices to me) which could involve disclosure of certain personal data about me to bring about delivery of the same as well as on the external cover of envelopes/mail packages); and/or

(v) complying with applicable law in administering, processing, handling and/or dealing with my claims.

(collectively the "Purposes")

(b) all insurer(s) who have insured vehicle(s) involved in this accident and the Insurers' law yers/law firms, may/are permitted to collect, use, disclose and/or process my Personal Information for one or more of the above Purposes; and

(c) my Personal Information may/can be disclosed by any of the Insurers and/or GIA to their third party service providers or agents (including their law yers/law firms), which may be sited outside of Singapore, for one or more of the above Purposes.

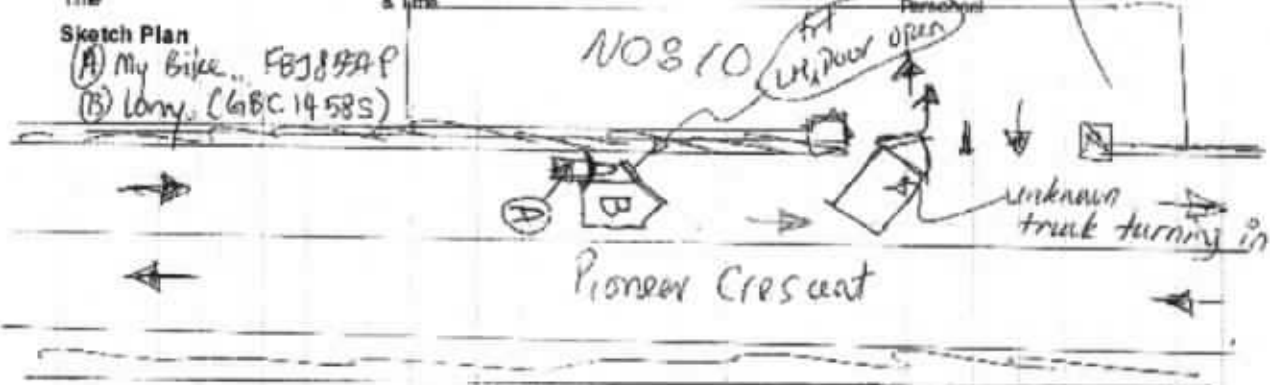
Policyholder's Signature / Date & Time

Driver's Signature (If driver is not the policyholder) / Date & Time

Witnessed by Reporting Centre Personnel

Sketch Plan

- (A) My Bike, FBJ89AP
- (B) Lorry, GBC1458S



Sketch Plan #2

Describe Circumstances of the Accident

I was riding going straight, ahead was a vehicle 'B' which was stopped waiting to turn in to NO2 10, as there was another truck also waiting to turn in. It was moving at a slow speed suddenly the vehicle 'B' left front open, and I braked immediately but could avoid and collided onto this vehicle door. My bike landed on the left side and fell down. My bike had damages and the vehicle 'B' door also had damages. I had some injuries and will seek medical attention. Taken photos at the scene. Police & Ambulance were at the scene.

Declaration

I/We declare the foregoing particulars are true in every respect.

Policyholder's Signature / Date & Time

Driver's Signature (if driver is not the policyholder) / Date & Time

Witnessed by Reporting Centre Personnel

Accident Photo



Accident Photo



Accident Photo



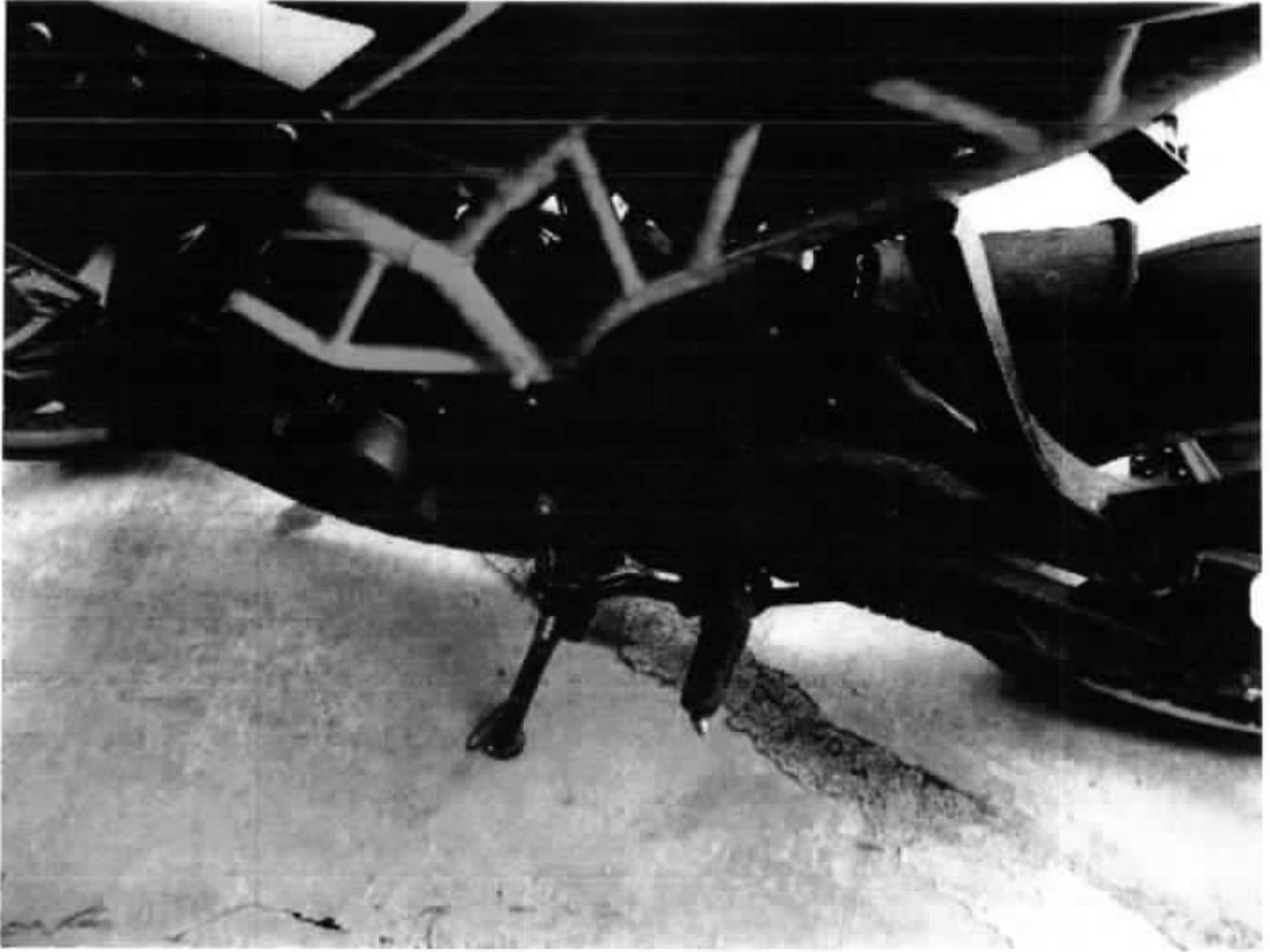
Accident Photo



Accident Photo



Accident Photo



Accident Photo



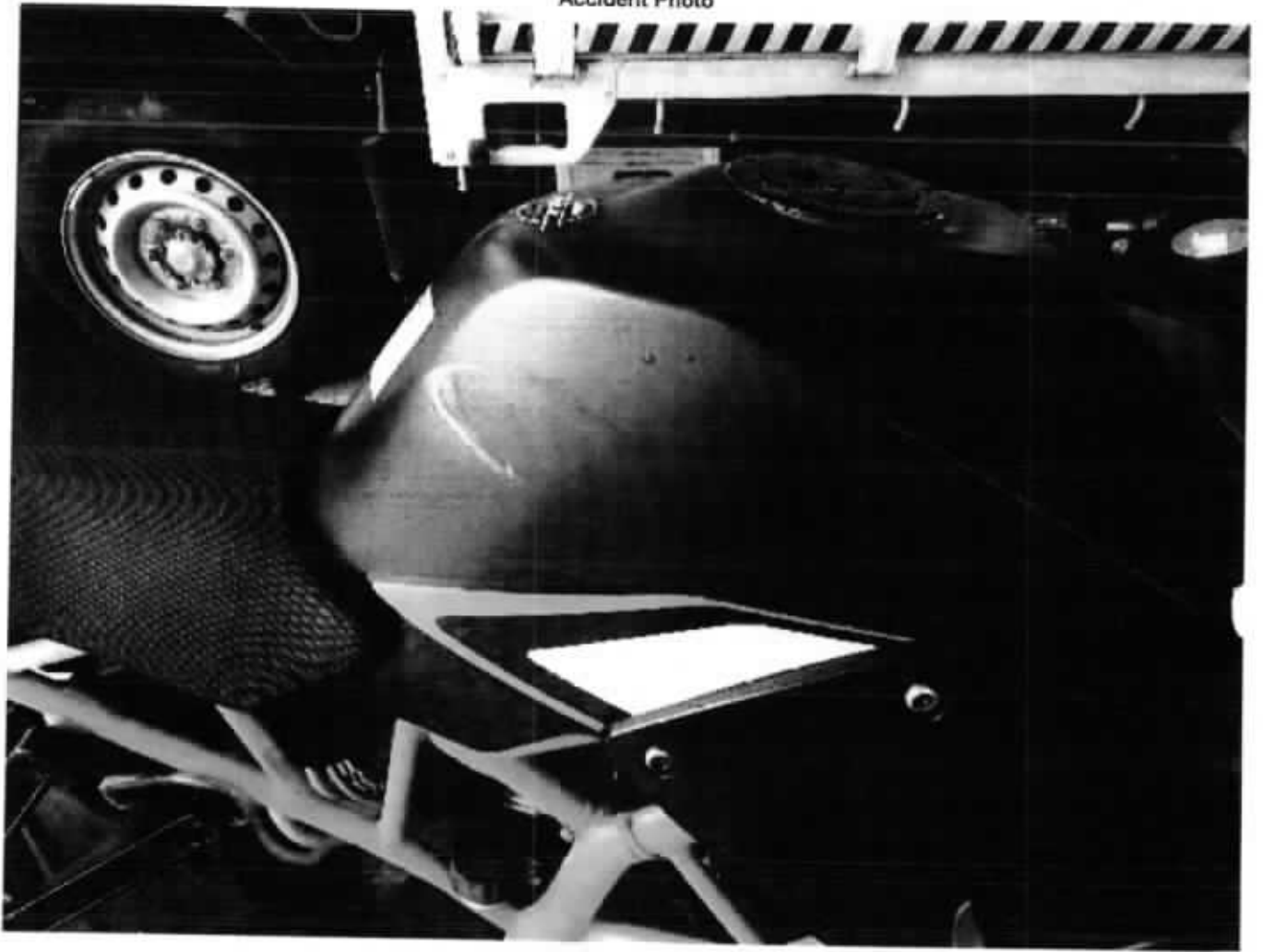
Accident Photo



Accident Photo



Accident Photo



Accident Photo



Accident Photo



Accident Photo



Accident Photo



Accident Photo





SINGAPORE POLICE FORCE



T/20170728/7002

Police Station Of Origin:
Traffic Police Division HQ
10 Ubi Avenue 3 SINGAPORE 408865
Tel No: 65470000

1 of 3

Report No. T/20170728/7002

REPORT OF A TRAFFIC ACCIDENT

Date/Time Report Made: 28/07/2017 10:49			Vide Report No.: T/20170509/7671		Station Diary No.:
Informant's Particulars					
Name of Informant: STIPP WERNER			Address: APT BLK 8 TEMASEK BOULEVARD #16-01 SUNTEC TOWER THREE SINGAPORE 038988		
ID Type / ID No.: FIN NO / G3184524L			Contact No.: Home/Office: Mobile: 92728524		
Nationality: SWISS			Email: werner.stipp@gmail.com		
Sex: Male	Age: 40	Date of Birth: 28/10/1976	Type of Informant: Rider		
Race: Caucasian			Language: English		Institution / School Name:
Occupation: AUDIT MANAGER			Driving Licence Information: Class: 2B,3		Date of Expiry: 11/07/2021

General Information of the Accident				
Type of Accident:	Injury Attended by Police	Drink Drive: No	Date/Time of Accident: 12/04/2017 10:00	Type of Location: Straight Road
Location: PIONEER CRESCENT Before gate entrance of my work, Kuehne-Nagel				
Weather: Cloudy		Road Surface: Wet		Road Speed Limit: 50 Km/h
Traffic Flow: Two Way		Traffic Control: Not Controlled		Traffic Volume: Moderate
Type of Collision: Moving Vehicle Against - Parked Vehicle				Anyone conveyed by ambulance: No

Details of Vehicle Involved						
Vehicle No.	Type	Make	Model	Color	Condition	No of Passenger
FBJ8554P	Motorcycle	KTM	RC200	Black	Seriously Damaged	1

Details of Person Involved	
Any Pedestrian Involved: No	
No. of Pedestrians Injured: NIL	Use of Pedestrian Crossing: NA



**SINGAPORE
POLICE FORCE**



T/20170728/7002

Police Station Of Origin:
Traffic Police Division HQ
10 Ubi Avenue 3 SINGAPORE 408865
Tel No: 65470000

2 of 3

Report No. T/20170728/7002

CONTINUATION OF REPORT

Rider			
Name	STIPP WERNER	ID No.	G3184524L
Related Vehicle	FBJ8554P (Motorcycle)	Contact No.	92728524
Hospital/Clinic	INTERNATIONAL MEDICAL CLINIC	Class of Driving Licence & Expiry Date	Class: 2B,3 Date of Expiry: 11/07/2021
Date Treatment	12/04/2017	Date Discharge	12/04/2017
No. of Days granted Medical Leave	03	Degree of Injury	Serious

Brief Details.

I was riding going straight, ahead was a vehicle "B" which was stopped waiting to turn into No10 Pioneer Crescent, Kuehne-Nagel. As there was another truck also waiting to turn in. I also wanted to turn into 10 Pioneer, so I started passing on the left side of vehicle "B". I was moving at a slow speed suddenly the vehicle "B" left front door opened. I braked immediately but could not avoid colliding into the vehicle door. My bike landed on the left side of the pavement and fell down. My bike had damages and the vehicle "B" door also had damages. I had injuries on my right upper leg, and on my right hand nail, and left ankle. The passenger that opened the door told me he was sorry and that he did not look in his mirror before opening his door. I have taken pictures on the scene. The police and ambulance were at the scene.



**SINGAPORE
POLICE FORCE**



T/20170728/7002

Police Station Of Origin:
Traffic Police Division HQ
10 Ubi Avenue 3 SINGAPORE 408865
Tel No: 65470000

3 of 3

Report No. T/20170728/7002

CONTINUATION OF REPORT

Sketch Plan

Informant is not able to provide sketch plan

Signature Of Officer Recording The Report:
Not applicable

Signature Of Interpreter:
Not applicable

Officer In Charge Of Case:
TP / TPIB /
MOHAMMAD ABDILLAH BIN PALIL
Contact No.: 65476246

Signature Of Informant:
The identity of the person making this report has
been authenticated by SingPass. No signature is
required.

Date/Time:
28/07/2017 10:49

Classification Of Case:

Authentication Stamp

NP168



**SINGAPORE
POLICE FORCE**

Traffic Police
10 Ubi Avenue 3
Singapore 408865
Tel +65 6547 0000
Fax +65 6547 6259
www.police.gov.sg

Our Ref : TP/IP/34813/2017
Date : 31 October, 2017

Stipp Werner
Blk 8 Temasek Boulevard
#16-01
Singapore 038988

Dear Sir/Madam

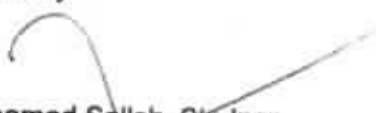
ACCIDENT INVOLVING FBJ8554P/ GBC1458S ON 12/04/2017 AT 1000 HRS, ALONG PIONEER CRESCENT

I refer to the above accident.

2. Please be informed that we have completed our investigations which shows that the passenger and driver of GBC1458S has committed an offence of Opening door and causing danger to other person under Rule 115(1)(a) Road Traffic (motor vehicle, construction & use) Rules and Permitting door to be opened which caused danger to other person under Rule 115(1)(a) Road Traffic (Motor Vehicles, Construction & Use) Rules. Action has been initiated against the passenger and driver respectively for the said offence

3. If you have any queries, please contact the Investigation Officer, Juremah at telephone number 65476190.

Yours faithfully


Zaini Mohamed Salleh, Sth Insp
For Head Investigation
Traffic Police
Singapore Police Force

SINGAPORE ACCIDENT STATEMENT

IMPORTANT NOTICE

1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Authorised Driver.
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4. The issue and acceptance of this Form by insurance companies is not an admission of policy liability on the part of the insurance companies.
5. Any false reporting may be referred to the Police for investigation.
6. This report will be forwarded by the insurers of the insurers of the GIA Records Management Centre established by the General Insurance Association of Singapore(GIA) for archiving and that copies of this report will for a fee be made available upon application by interested parties.
7. By the lodgement of this report to the insurers, you hereby consent to the archiving of this report at the centre and to copies of the report being made available aforesaid.

ACCIDENT STATEMENT

Date Of Report	13/04/2017 08:24
Date Of Accident	12/04/2017 09:45
Exact Location Of Accident	10 PIONEER CRESCENT
Country/State of Loss	SINGAPORE

DETAILS OF OWN VEHICLE

Vehicle Registration Number	GBC1458S
Insured/Policyholder	
Name Of Registered Owner	FINE AIR ENGINEERING PTE LTD
Co Reg No	199904517D
Email Address	KARLTONPHUA@GMAIL.COM
Mobile Phone No	
Alternative Phone No	OFFICE-64539028

Vehicle Particulars

Manufacturer	NISSAN
Model	CABSTAR
Exact Purpose for which vehicle was being used at time of accident	WORK PURPOSE
Are you claiming under your own insurance policy for repair to your vehicle?	NO
If No, Please state action to be taken	THIRD PARTY
Vehicle Category	COMMERCIAL VEHICLE

Insurance Company

Name of Insurance Company	NTUC INCOME INSURANCE CO-OPERATIVE LTD
Type Of Coverage	COMPREHENSIVE
Fleet Policy	NO
Policy Number	5081319221
Cover Note Number	

Driver

Name of Driver	TAN KIAM HOCK
NRIC No	S2673281F
Date Of Birth	25/12/1965
Occupation	OUTDOOR
Date Of Driving Pass	04/11/1989
Driving Experience	27 YEARS AND 5 MONTHS
Gender	MALE
Mobile Number	(LOCAL) +65-98391945
Fax Number	
Contact Number	
Email Address	KARLTONPHUA@GMAIL.COM

Address BLK 433 TAMPINES STREET 43
 #11-57
 Postcode 520433
 Was driver an employee of the Insured's Company YES
 If No, Relationship of the Driver with the Insured
 Vehicle Registration Number of Driver's Own Vehicle -
 -
 -
 Insurance Company of Driver's Own Vehicle -
 -
 -

General Information of the Accident

Type Of Accident UNKNOWN - REFER STATEMENT & SKETCH PLAN
 Weather Conditions CLEAR
 Road Surface DRY

Other Information

Was any foreign vehicle involved in this accident? NO
 Was any body injured in the Accident? YES
 Was any other material or property damaged? YES
 I have been approached by unknown person(s) soliciting/offering accident claims assistance. NO
 Number of Passengers (Including Driver) 3

Details of Police Action

Was the accident reported to the police? NO
 If Yes, Please state which Police Station
 Was notice of intended Prosecution given? NO
 If Yes, against whom?

Circumstances of Accident

REFER ATTACHED

Attachment(s)

Are accident photos available for attachment? YES
 Was there any video captured by Car Camera? NO
 Was there any audio recorded? NO

DETAILS OF OTHER VEHICLE PROPERTY 1

Vehicle Registration Number FBJ8554P
 Vehicle Make/Model/Colour
 Details Of Properties
 Name of Driver WERNER STIPP
 NRIC/Passport Number G3184524L
 Contact Number 92728524
 Address
 Postcode
 Insurance Company Name
 Nature Of Damage
 No. Of Passenger (Including Driver)

Details of Witness

Name
 Phone Number
 Email Address

DETAILS OF INJURED PERSON 1

Name WERNER STIPP

Approximate Age

Injuries Sustain

Injured person in which vehicle?

FBJ8554P

Were seat belts worn?

Was injured conveyed to hospital by ambulance?

Address

Postcode

SKETCH PLAN

IMPORTANT NOTICE

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I understand, acknowledge, agree and consent that:

(a) My insurer, my workshop and the General Insurance Association of Singapore ("GIA") may be permitted to collect, use, disclose and/or process my personal data/personal information set out in this form and any other personal information provided by me or possessed by my insurer (collectively the "Personal Information") and disclose and transfer such Personal Information to all insurer(s) who have insured vehicle(s) involved in this accident (all insurer(s) who have insured vehicle(s) involved in this accident shall be collectively referred to as the "Insurers"), the Insurers' law firms, the Monetary Authority of Singapore and any relevant government agency/authority (such as the police), for the purpose(s) of:

(i) processing, handling and/or dealing with my claims including the settlement of the claims and any necessary investigations relating to the claims.

(ii) investigating the accident and/or my claims.

(iii) carrying out and/or dealing with my instructions or responding to any inquiries by me.

(iv) administering my claims (including the making of correspondence, statements, reports, reports or notices to me, which could involve disclosure of certain personal data about me to bring about delivery of the sums as well as on the external cover of envelopes, mail packages), and/or

(v) complying with applicable law in administering, processing, handling and/or dealing with my claims.

(collectively the "Purposes")

(b) all insurer(s) who have insured vehicle(s) involved in this accident and the Insurers' law firms, may be permitted to collect, use, disclose and/or process my Personal Information for one or more of the above Purposes; and

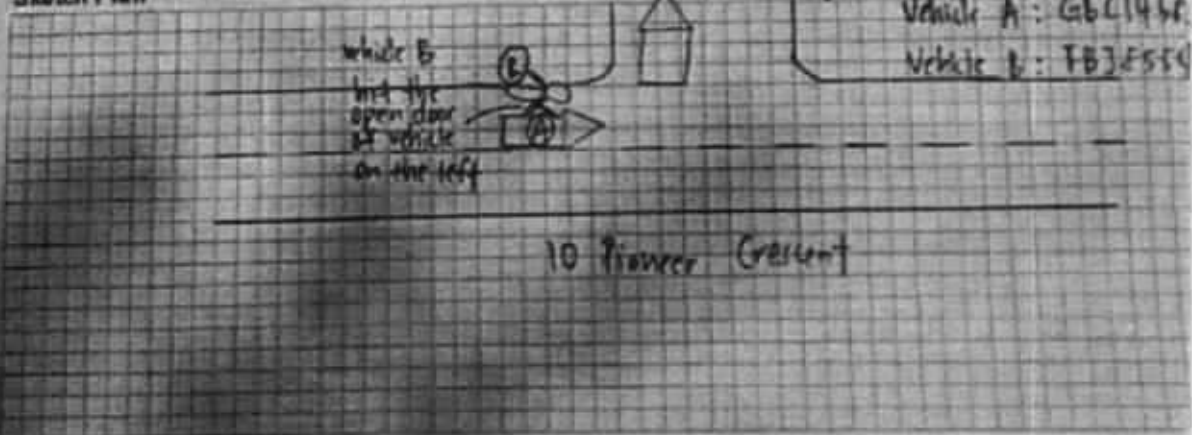
(c) my Personal Information may be disclosed by any of the Insurers and/or GIA to their third party service providers or agents (including their law firms), which may be used outside of Singapore, for one or more of the above Purposes.

Policyholder's Signature / Date & Time

Driver's Signature (if driver is not the policyholder) / Date & Time

Witnessed by Reporting Centre Personnel

Sketch Plan



Sketch Plan #2

Describe Circumstances of the Accident

My Sony C8614535 was stationary and waiting in the queue for security clearance to enter a warehouse building. My passenger on the left wanted the vehicle to change security rules to enter the building. My passenger checked clear on the vehicle side mirror and blind spot to ensure the narrow passageway was clear and no vehicle was in sight before opening the door to alight from the vehicle. However, to his surprise a speeding motorcycle appeared on the left of the vehicle and banged into the left passenger door. We were all shocked as the narrow passage was clear and there was no vehicle approaching before the passenger opened the door to alight from the vehicle. We never thought that someone will overtake in the left as it is obvious that it is sudden as the motorcycle was travelling quite fast to cut the vehicle queue to enter the warehouse building.

Declaration

I/we declare the foregoing particulars are true in every respect

Policyholder's Signature / Date & Time

Driver's Signature (if driver is not the policyholder) / Date & Time

Witnessed by Reporting Centre Personnel

Accident Photo



Accident Photo



Accident Photo

11



Accident Photo



Accident Photo



Identification Card



Accident Photo



Accident Photo



Accident Photo



Accident Photo



IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE

MC/MC 18855/2017

Between
FINE AIR ENGINEERING PTE LTD
(UEN NO. 199904517D)

... Plaintiff

AND
STIPP WERNER
(FIN NO.G3184524L)

... Defendant

**AFFIDAVIT OF EVIDENCE IN CHIEF OF TAN KIAM HOCK IN RESPECT OF
LIABILITY**

I, **TAN KIAM HOCK** (NRIC NO. S2673281F) care of Ang Mo Kio Industrial Park I
Blk 4024, #01-311 Singapore, Supervisor, do solemnly affirm and say as follows :-

1. I am employed by the Plaintiff as their supervisor. I confirmed that I was the driver of motor lorry No GBC 1458S. The facts deposed to herein are within my personal knowledge.
2. On 12th April 2017, at about 9.45 am, I was driving my motor lorry along Pioneer Crescent. The entire stretch of the road was marked with double yellow zig zag lines. My colleague was the front seat passenger. The traffic volume was moderate. The road surface was a bit wet. Visibility was clear. I stopped my lorry and turned on my left signal behind two lorries waiting for security clearance to enter to a worksite building ie a warehouse. My front seat passenger decided to alight first to obtain the security passes. I did not keep close to the kerb as I intended to turn left soon.
3. I looked at my rear view mirror and saw that it was clear. At the same time, my front seat passenger also checked by looking at the left wing mirror and blind spot before alighting from the lorry. My front seat passenger then opened the door for a few seconds and getting ready to alight when suddenly a motorcycle No FBJ 8554P ridden by the Defendant knocked into the edge of the front passenger door. I saw that the Defendant's skidded before falling onto the left side of the road. The Defendant also fell down.
4. I alighted from the motor lorry. I asked the Defendant whether he was alright. I saw that his pants were torn and some bleeding. The traffic police came.

5. The Defendant did not say anything to me.
6. Traffic police came and took down our particulars and my front passenger's work permit.
7. My front seat passenger had since returned to Bangladesh last year after his work permit had expired.
8. I wish to state that my front seat passenger did check before alighting. Furthermore, I did not expect a motorcycle to ride on the left and overtake on the left. Furthermore, it was obvious that my motor lorry was positioned behind two lorries to make a left turn. If the Defendant had intended to make a left turn and go through security clearance to enter into the warehouse, he should have queued behind my lorry instead of trying to overtake on the left.
9. I annex a copy of my accident report, scene photographs, photographs of my motor lorry marked "A" .
10. I believe that the accident was caused by the negligent driving of the Defendant and I asked for judgment in respect of my claim.

AFFIRMED by the abovenamed
TAN KIAM HOCK
 Through the interpretation in Mandarin language
 By Julie Tok
 on this 9th day of October 2018

)
)
)
)
)




A COMMISSIONER FOR OATHS



This is the exhibit marked "A" referred to in the affidavit of
TAN KIAM HOCK affirm before me this
9th day of October 2018.



A Commissioner for Oaths,

Singapore

IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE

MC/MC 18855/2017

Between

FINE AIR ENGINEERING PTE LTD
(Singapore UEN No. 199904517D)

...Plaintiff

And

STIPP WERNER
(FIN No. G 3184524L)

...Defendant

AFFIDAVIT OF EVIDENCE-IN-CHIEF OF STIPP WERNER

I, **STIPP WERNER** (FIN No. G 3184524L) of 35 Bukit Batok East Avenue 6, Park Natura, #04-14, Singapore 659765, do solemnly and sincerely swear and state as follows:-

1. I am the abovenamed Defendant.
2. The matters deposed to herein are within my personal knowledge or knowledge acquired from the documents relating to this matter. Insofar as the matters deposed to herein are not within my personal knowledge, they are true to the best of my knowledge, information and belief.
3. The Plaintiff's claim for damages against me arises out of an accident on or about 12 April 2017 at around 10.00 am along Pioneer Crescent at the

driveway outside the Kuehne-Nagel compound ("**the said compound**"). The accident involved the motorcycle no. FBJ 8554P ridden by myself ("**my motorcycle**") and the motor truck no. GBC 1458S owned by the Plaintiff ("**the Plaintiff's truck**") and driven by one TAN KIAM HOCK (NRIC No. S 2673281F) ("**the Plaintiff's driver**"). At the material time, there was also an unknown passenger was traveling in the front passenger seat ("**the Plaintiff's passenger**").

4. At the material time, I was riding along the left side of the left lane of Pioneer Crescent towards the said compound. I then noticed that the Plaintiff's truck was stopped ahead behind an unknown stationary truck along Pioneer Crescent and was waiting to turn left into the said compound ahead. The Plaintiff's stationary truck was stopped at least two (2) metres away from the left side road kerb.
5. As I had likewise intended to turn left into the Kuehne-Nagel compound, I decided to pass on the left side of the Plaintiff's stationary truck to overtake both stationary vehicles ahead of me in order to make the said left turn ahead.
6. At the material time, there was more than sufficient leeway between the Plaintiff's stationary truck and the left kerb of at least two (2) metres. At this point in time, both doors of the Plaintiff's truck was shut, and the

hazard lights and signal lights on the Plaintiff's truck were also not switched on.

7. I thereafter turned to check that there were no oncoming vehicles, and after ascertaining that my path of travel was clear, I proceeded to ride forward slowly (i.e. at a speed not exceeding 20 km/h) with a view to overtaking the Plaintiff's stationary truck from its left.
8. Just as I was slowly riding past the front left passenger door of the Plaintiff's truck, the said front left passenger door suddenly opened directly in front of me. I immediately engaged my emergency brakes in an attempt to avoid colliding into the front left passenger door of the Plaintiff's truck, but was unable to bring my motorcycle to a safe stop in time.
9. As a result, the front handlebars of my motorcycle collided into the front left passenger door of the Plaintiff's truck. I then fell off my motorcycle and onto the grass patch to my adjacent left.
10. After the collision, I got off my motorcycle and noticed that I had suffered some abrasions to my right upper leg, right hand and left ankle. The Plaintiff's passenger then approached me to render assistance, and therein apologised for having caused the accident. He then informed me that he

did not check his wing mirror for oncoming vehicles before opening his door, and therefore had failed to see my motorcycle riding past as he opened the front left passenger door.

11. Upon inspecting both vehicles, I noticed that the front left passenger door of the Plaintiff's truck had suffered some dents. I had also noticed that there was some damage sustained to the front handlebars and mudguard of my motorcycle.
12. I then proceeded to take accident scene photographs which I had enclosed to my Singapore Accident Statement dated 13 April 2017, and which is now reproduced herein in the exhibit marked "SW-1".
13. The Traffic Police and ambulance subsequently arrived at the scene. However, I was not conveyed to the hospital via ambulance, and all parties involved left the accident scene soon after.
14. The day after the accident, I filed my Singapore Accident Statement dated 13 April 2017 to provide details of the accident. On 28 July 2017, I also filed my Traffic Police report to provide further details of the accident.

15. Exhibited hereto collectively and marked "SW-1" are copies of my Singapore Accident Statement dated 13 April 2017 and my Traffic Police report dated 28 July 2017 for this Honourable Court's reference.
16. I had also been informed by my solicitors that the investigations by the Traffic Police revealed that the Plaintiff's passenger had committed an offence of Opening Door and Causing Danger to Other Person under Rule 115(1) Road Traffic (Motor Vehicle, Construction & Use) Rules.
17. Further to the same, I had also been informed that the Plaintiff's driver had committed an offence of Permitting Door to be Opened which Caused Danger to Other Person under Rule 115(1) Road Traffic (Motor Vehicles, Construction & Use) Rules.
18. Action had accordingly been initiated against both the Plaintiff's driver and passenger. Exhibited hereto and marked "SW-2" is a copy of the letter from the Traffic Police to me dated 31 October 2017 informing me of the Traffic Police action taken against the Plaintiff's driver and passenger.
19. I have been informed by my solicitors that the Plaintiff's driver claimed that the left passenger door of his truck was already prior to the collision with my vehicle, as the Plaintiff's passenger was about to alight from his said vehicle. Further to the same, the Plaintiff's driver then claimed that it

was my speeding motorcycle which had ridden straight into the front left passenger door of the Plaintiff's truck which was already opened at the time. I verily deny this version of events.

20. I wish to reiterate that at all material times prior to the collision, I had not seen the front left passenger door of the Plaintiff's truck open. It was the Plaintiff's passenger who had failed to heed the presence of my oncoming motorcycle, and thereby opened the front left passenger door abruptly.
21. Further to the same, the hazard lights and / or signal lights on the Plaintiff's truck were not switched on. In this regard, there was no way for me to reasonably anticipate that the Plaintiff's passenger would have suddenly opened his front left passenger door into the path of my oncoming motorcycle.
22. I also wish to highlight that the Plaintiff's truck was stopped more than two (2) metres away from the left road kerb, which was nowhere close to an appropriate distance from the kerb for which it would have been safe to alight a passenger. This is clearly seen in the accident scene photographs enclosed to my Singapore Accident Statement dated 13 April 2017, exhibited hereto as "SW-1".

23. Moreover, the Plaintiff's truck was stopped along a double yellow "zig-zag" line, which prohibits the stopping of any vehicles on this side of the road at all material times. In the circumstances, it was clearly unsafe and / or unlawful to have alighted his passenger at the material time.

Sworn / affirmed by the abovenamed)

STIPP WERNER)

This 16th day of ~~October~~ November 2018)

At Singapore)

[Handwritten signature]

Before Me,

[Handwritten signature]

A Commissioner for Oaths



THIS IS THE EXHIBIT MARKED

SW-1

REFERRED TO IN THE AFFIDAVIT OF

STIPP WERNER

SWORN / ~~AFFIRMED~~ ^{November} THIS ~~16th~~ DAY OF ~~OCTOBER~~ 2018

BEFORE ME,



A COMMISSIONER FOR OATHS



THIS IS THE EXHIBIT MARKED

SW-2

REFERRED TO IN THE AFFIDAVIT OF

STIPP WERNER

SWORN / ~~AFFIRMED~~ ^{Noverse} THIS 16th DAY OF ~~OCTOBER~~ 2018

BEFORE ME,



A COMMISSIONER FOR OATHS





LKK Auto Consultants Pte Ltd

51 Ubi Ave 1 #01-25 Paya Ubi Industrial Park, Singapore 408933

TEL: 6256 3561 FAX: 6256 4315

Reg. No: 199607198R GST Reg. No. 19-9607198-R

Affiliated to Federation Internationale Des Experts En Automobile				
CATHERINE LIM LLC			Ref : CS/LAW19008267/Gvd3e2	
20 HAVELOCK ROAD #03-01 CENTRAL SQUARESINGAPORE 059765			Date : 21-05-2019	
			Code : L079	
1. Policy Particulars :- THIRD PARTY CLAIM (RESURVEY INSPECTION)				
Insured Veh.	FBJ 8554P	Veh. Inspected	GBC 1458S	
Policy No.		Coverage (\$)	0.00	
Claim No.	PYK/YHT0KW00007.2135	Excess (\$)	0.00	
Assign From	CATHERINE LIM	Assign Date	26/04/2019	
2. Vehicle Particulars & Condition				
Make & Model	NISSAN CABSTAR	c.c	2953	
Engine No.	HIDDEN	Year of Reg.	2011	
Chassis No.	JN1SC2F24Z0850004	Colour	SILVER	
Odometer	247146	Steering	IN ORDER	
Brakes	IN ORDER	Modification	NIL	
General	GOOD			
3. Conditions of Tyres				
	Size	Make	Balance	
R/H Front Tyre	195 R15	BRIDGESTONE	5 mm	
L/H Front Tyre	195 R15	BRIDGESTONE	5 mm	
R/H Rear Tyre	165 R13	BRIDGESTONE	5 mm	
L/H Rear Tyre	165 R13	BRIDGESTONE	5 mm	
4. Description of Damages				
THE VEHICLE HAD COMPLETED ITS REPAIR WORKS.				
REPAIR CONDITION SEE DETAILS.				
5. General Information				
Accident Date	12/04/2017	Inspection Date	16/05/2019	
Survey held at	BLK 4024 ANG MO KIO IND PK 1 #01-311			
Repairer	WAH YU AUTOMOTIVE BODY WORK			
5a. Remarks				
A)THE INSPECTION WAS CONDUCTED ON A"WITHOUT PREJUDICE" BASIS.				
B)IN ACCORDANCE TO YOUR INSTRUCTIONS, WE HAVE NOT AUTHORISED REPAIRS.				
5b. Estimate Days of Repair				
ESTIMATED NORMAL PERIOD FOR REPAIR:		4 Working Days		



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ADJUSTMENT ON REPAIR COST FOR VEHICLE NO. GBC 1458S

Qty	Description of Parts	Condition	Estimate By Workshop (\$)	Our Adjusted (\$)
<u>REPLACEMENT OF PARTS</u>				
1	FRONT CORNER PANEL - N/S	REPLACED	437.00	437.00
1	FRONT SIDE BODY PANEL - N/S	REPAIRED SEE LABOUR	1,845.50	-
1	FRONT DOOR ASSEMBLY - N/S	REPAIRED SEE LABOUR	1,696.40	-
	LESS 30% DISCOUNT		-1,193.67	-131.10
			2,785.23	305.90
<u>NETT ITEMS</u>				
1	FRONT SLIT COVER - N/S (N)	REPLACED	23.30	23.30
1	FRONT CORNER PANEL PROTECTOR - N/S (N)	REPLACED	4.00	4.00
1	FRONT DOOR UPPER HINGE - N/S (N)	REPLACED	56.40	56.40
1	FRONT DOOR LINK STOPPER - N/S (N)	NOT NECESSARY	39.70	-
1	FRONT DOOR LOWER HINGE - N/S (N)	REPLACED	56.40	56.40
1	FRONT DOOR LOWER WEATHER-STRIP - N/S (N)	REPLACED	22.90	22.90
8	FRONT DOOR LOWER WEATHER-STRIP CLIP - N/S @\$1.20 (N)	REPLACED	9.60	9.60
	LESS 10% DISCOUNT		-21.23	-17.26
			191.07	155.34
<u>SPECIAL NETT ITEMS</u>				
1	FRONT DOOR INNER SEALANT - N/S (SN)	NOT NECESSARY	80.00	-
1	FRONT DOOR COMPANY DETAILS LABEL - N/S (SN)	REPLACED	45.00	40.00
			125.00	40.00
<u>LABOUR</u>				
	TO PANEL BEAT AND REPAIR LEFT FRONT SIDE BODY PANEL INCLUDING REPLACEMENT OF THE LEFT FRONT DOOR DAMAGED PARTS. INCLUSIVE OF THE REPAIR OF FRONT SIDE BODY PANEL - N/S AND FRONT DOOR ASSEMBLY - N/S.		1,400.00	400.00
	TO TRANSFER LEFT FRONT DOOR LOCKING MECHANISM AND OTHER COMPONENTS TO NEW DOOR PANEL INCLUDE CHECKING COMPONENTS FOR FUNCTION.	NOT NECESSARY	120.00	-

Report Ref No. CS/LAW19008267/Gvd3e2



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Qty	Description of Parts	Condition	Estimate By Workshop (\$)	Our Adjusted (\$)
	TO CHECK FRONT LIGHTINGS AND ELECTRICAL WIRING SYSTEMS INCLUDE FOCUSING BOTH HEADLIGHTS AND ADJUST IF NECESSARY.		80.00	30.00
	TO PUTTY AND RE-SPRAY PAINTING ON LEFT FRONT SLIT COVER, LEFT FRONT CORNER PANEL, LEFT FRONT SIDE BODY PANEL AND LEFT FRONT DOOR.		900.00	400.00
	RUST-PROOFING ON THE LEFT FRONT ACCIDENT AFFECTED PORTIONS.	NOT NECESSARY	80.00	-
			2,580.00	830.00
GRAND TOTAL			5,681.30	1,331.24
RECOMMENDED COST OF LUMP SUM REPAIRS (TO ITS PRE-ACCIDENT CONDITION)				1,050.00

Report Ref No. CS/LAW19008267/Gvd3e2

XING GUO QIANG

M.MATAI, AMSAE-A

Automotive Assessor

K.K.LAU CPT(RET)

BEng(Hons),B.Bus,MBA,PEng,PE,
MInstAEA,MASME,MIRTE

REGD Auto Consultant-SAE, Licensed Appraiser

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