

**I.R.B. LAW LLP | MAIN OFFICE**

117A Jalan Sultan, Singapore 199007

T : 6298 2537 F : 6298 2547 www.irblaw.com.sg

We are a Singapore registered limited liability partnership (UEN T12LL0483A)

GST Registration No: M90368625L

Your ref : *To be advised*
 Our ref : **MB-LK/2019012866/lk**
 Date : 24 June 2019

Writer : Mohamed Baiross
 Email : baiross@irblaw.com.sg
 Foreign Lawyer : Lavanya
 Email : lavanya@irblaw.com.sg
 Tel : 6298 2537(Ext. 109)

AIG Asia Pacific Insurance Pte. Ltd.
 78 Shenton Way #07-16
 Singapore 079120

<input checked="" type="checkbox"/>	By Fax	: 6415 3727
<input type="checkbox"/>	By PDX	:
<input type="checkbox"/>	By Hand	:
<input checked="" type="checkbox"/>	By Post	: AR Registered Post

(Enclosures sent by Post only)

WITHOUT PREJUDICE
SAVE AS TO COSTS

Dear Sirs,

CLAIMANT: SYED SALEH S/O SYED MAHIDEEN ABDUL KADER
ACCIDENT ON 24.03.2018 INVOLVING FX6299T AND SLK3975S ALONG ANG
MO KIO AVENUE 4

We refer to the above matter.

We are instructed by **Syed Saleh S/o Syed Mahideen Abdul Kader** ("our client") to notify you of a road traffic accident on 24 March 2018 at along Ang Mo Kio Avenue 4 involving our client's vehicle registration number FX6299T ("our client's vehicle") and vehicle registration number SLK3975S driven by your insured driver at the material time.

As a result of the accident, our client's vehicle has been damaged. Before our client / we proceed to repair our client's vehicle, please let us know **within 2 working days** of your receipt of this notice whether you or your insurer would like to conduct a pre-repair survey of the vehicle. If we do not receive any reply from you within the stipulated timeline, our client / we shall proceed to repair the vehicle without further reference to you.

For your easy reference, we enclose herewith copies of the following:

- i. Singapore Accident Statement filed by our client;
- ii. Estimate of the repairs cost issued by Erofia Motor Trading Pte Ltd;

Date: 24 June 2019
I.R.B. Law LLP

- iii. LTA search of motor vehicle no. SLK 3975S; and
- iv. Letter from traffic police department dated 16 January 2019.

Yours faithfully,

f I.R.B. Law
I.R.B. LAW LLP

Encls. (by post only)

cc. client

21-06-19;14:45 ;

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MSI110088171 / STA INSPECTION PTE LTD - Sin Ming
ENTRY DATE & TIME: 09/07/2018 14:24
SUBMITTED BY: Wong Lip Yong

Your NCD will be affected due to late reporting
Actual e-Filing Submission Date & Time: 09/07/2018 14:36

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 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	09/07/2018 14:24
Date Of Accident	24/03/2018 21:55
Exact Location Of Accident	ALONG ANG MO KIO AVE 4 AT CARPARK EXIT A7B
Country/State of Loss	SINGAPORE

DETAILS OF OWN VEHICLE

Vehicle Registration Number	FX8298T
Insured/Policyholder	
Name Of Registered Owner	SYED SALEH S/O SYED MOHIDEEN ABDUL KADER
NRIC No	S8710784A
Email Address	SYED.SALSA87@GMAIL.COM
Mobile Phone No	(LOCAL) +65-81285843
Alternative Phone No	OTHERS-81285843
Vehicle Particulars	
Manufacturer	PIAGGIO
Model	X9 200-198CC EVO (A)
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	THIRD PARTY
Fleet Policy	NO
Policy Number	5095018568
Cover Note Number	
Driver	
Name of Driver	SYED SALEH S/O SYED MOHIDEEN ABDUL KADER
NRIC No	S8710784A
Date Of Birth	25/04/1987
Occupation	INDOOR
Date Of Driving Pass	21/08/2007
Driving Experience	10 YEARS AND 9 MONTHS
Gender	MALE
Mobile Number	(LOCAL) +65-81285843
Fax Number	
Contact Number	OTHERS-81285843
Email Address	SYED.SALSA87@GMAIL.COM

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Address BLK 8 LOR LEW LIAN #12-154
SINGAPORE

Postcode 531008

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 SIDE SWIPE

Weather Conditions CLEAR

Road Surface DRY

Other Information

Was any foreign vehicle involved in this accident? NO

Number of vehicles involved in the accident 2

Was any body injured in the Accident? YES

Was any injured conveyed to hospital by ambulance? 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) 2

Passenger 1 NAME: : NUR HAFIZAH BINTE HAMZAH

GENDER: : FEMALE

Details of Police Action

Was the accident reported to the police? YES

If Yes, Please state which Police Station

Police Station Name TRAFFIC POLICE DIVISION HQ

Police Station Address ROAD: 10 UBI AVENUE 3 , POSTCODE: 408885 , COUNTRY: SINGAPORE

Police Station Contact TEL NO: 65470000 - FAX NO:

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 SLK397SS

Vehicle Make/Model/Colour

Details Of Properties

Vehicle Category PRIVATE CAR

Name of Driver

NRIC/Passport Number

Contact Number

Address

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Postcode

Insurance Company Name

AIG ASIA PACIFIC INSURANCE PTE. LTD.

Nature Of Damage

No. Of Passenger (Including Driver)

DETAILS OF INJURED PERSON 1

Name SYED SALEH S/O SYED MOHIDEEN ABDUL KADER
Approximate Age
Injuries Sustain REFER POLICE REPORT
Injured person in which vehicle? FX6288T
Were seat belts worn?
Was this injured conveyed to hospital by ambulance? YES
Address
Postcode

DETAILS OF INJURED PERSON 2

Name NUR HAFIZAH BINTE HAMZAH
Approximate Age
Injuries Sustain REFER POLICE REPORT
Injured person in which vehicle? FX6299T
Were seat belts worn?
Was this injured conveyed to hospital by ambulance? YES
Address
Postcode

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Sketch Plan Pg. 1

SKETCH PLANIMPORTANT 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 lodgment 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 this accident (all insurer(s) who have insured vehicle(s) involved in this accident shall be collectively referred to as the "Insurers"), the Insurers' lawyers/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' lawyers/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 lawyers/law firms), which may be sited outside of Singapore, for one or more of the above Purposes.
- (d) my Personal Information will also be collected and used to compile claims history for the purpose of fraud detection, investigation and management in present and all future claims.
- (e) the information so collected under (d) above may be shared / disclosed:
 - (i) to all insurers and/or any other third parties that assist in evaluating, investigating, controlling or managing fraud, regulators, law enforcement and government agencies as reasonably required for the purposes stated, or
 - (ii) for complying with requirements under any regulations, laws or court orders.

Policyholder's Signature
Date & Time:

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

Reporting Centre Personnel's Signature
Name:
NRIC/PIN No.:

GIAACC SketchPlanForm_V3

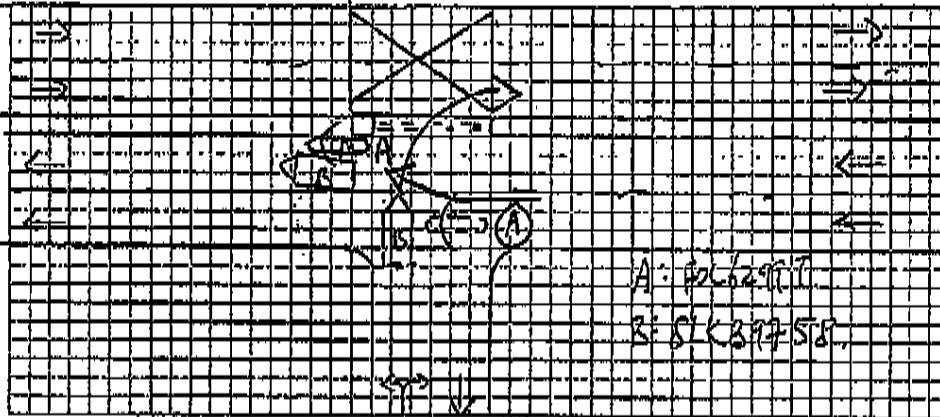
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Sketch Plan #2 Pg. 1

SKETCH PLAN



DESCRIBE CIRCUMSTANCES OF THE ACCIDENT

Redar Police Report.

DECLARATION

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

Policyholder's Signature
Date & Time:

GIAHAC Sketch Plan Form_V2

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

Reporting Centre Personnel's Signature
Name:
NRIC/FIN No.:

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Accident Sketch Plan Pg. 1


**SINGAPORE
POLICE FORCE**


T/20180624/7007

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

1 of 4

Report No. T/20180624/7007

REPORT OF A TRAFFIC ACCIDENT

Date/Time Report Made: 24/06/2018 20:46		Vide Report No.:		Station Diary No.:	
Informant's Particulars					
Name of Informant: SYED SALEH S/O SYED MOHIDEEN ABDUL KADER			Address: APT BLK 8 LORONG LEW LIAN #12-154 SINGAPORE 531008		
ID Type / ID No.: NRIC NO / S8710784A			Contact No.: Home/Office: Mobile: 81285843		
Nationality: SINGAPORE CITIZEN			Email: syed.salsa87@gmail.com		
Sex: Male	Age: 31	Date of Birth: 25/04/1987	Type of Informant: Rider		
Race: Indian			Language: English		Institution / School Name:
Occupation: EXECUTIVE (DATA & SYSTEMS)			Driving Licence information: Class: 2B		Date of Expiry:

General Information on the Accident				
Type of Accident:	Injury Attended by Police	Drink Drive: No	Date/Time of Accident: 24/06/2018 21:55	Type of Location: Straight Road
Location: ANG MO KIO AVENUE 4 Along the main road of Ang Mo Kio Ave 4, at carpark exit A76.				
Weather: Clear		Road Surface: Dry		Road Speed Limit:
Traffic Flow: Two Way		Traffic Control: Traffic Light - Working		Traffic Volume: Light
Type of Collision: Between Moving Vehicles - Side Swipe - Same Direction				Anyone conveyed by ambulance: Yes

Details of Vehicle Involved					
Vehicle No.:	Type:	Make:	Model:	Color:	Condition: No. of Passenger:
FX8299T	Motorcycle	PIAGGIO	X9 200 EVO A	Gray	Seriously Damaged 2

Details of Vehicle Insurance				
Vehicle No.:	Insurance Company:	Insurance No.:	Effective Date:	Expire Date:
FX8299T	NTUC Income Insurance Co-Operative Limited	5095018568	12/10/2017	14/12/2018

SLK 39755

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Accident Sketch Plan Pg. 1



**SINGAPORE
POLICE FORCE**



T/20180624/7007

Police Station Of Origin:
Traffic Police Division HQ
10 Ubi Avenue 3 SINGAPORE 408885
Tel No: 65470000

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Report No. T/20180624/7007

CONTINUATION OF REPORT

Details of Person Involved:			
Any Pedestrian Involved: No			
No. of Pedestrians Injured: NIL		Use of Pedestrian Crossing: NA	
Details of Person Involved:			
Name	SYED SALEH S/O SYED MOHIDEEN ABDUL KADER	ID No.	S8710784A
Related Vehicle	FX6299T (Motorcycle)	Contact No.	81285843
Hospital/Clinic	KHOO TECK PUAT HOSPITAL	Class of Driving Licence & Expiry Date	Class: 2B Date of Expiry: NIL
Date Treatment	24/03/2018	Date Discharge	22/08/2018
No. of Days granted Medical Leave	102	Degree of Injury	Serious
Details of Person Involved:			
Name	NUR HAFIZAH BINTE HAMZAH	ID No.	S8222485F
Related Vehicle	FX6299T (Motorcycle)	Contact No.	85880437
Hospital/Clinic	KHOO TECK PUAT HOSPITAL	Class of Driving Licence & Expiry Date	Class: NIL Date of Expiry: NIL
Date Treatment	25/03/2018	Date Discharge	29/03/2018
No. of Days granted Medical Leave	27	Degree of Injury	Slight

Brief Details.

Prior to the above mentioned accident date/time, I was heading home with my wife, the pillion, travelling along Ang Mo Kio Avenue 5 and had made a right turn into Ang Mo Kio Avenue 4, I recall that the road was a two lane road, but I am unable to remember which lane I was on when the accident happened.

I was going straight when I noticed a car inching out of the first carpark exit on the left, the car did not have any signal on to indicate which direction he intended to turn to. As I live nearby, I am familiar with that carpark exit, I recall that one may make both a left or right turn to the opposite side of the road, however the vehicle had inched out too much to make a left turn, as he would have already done so if that was his intention.

Hence I could see that he intended to make a right turn and so proceeded to horn to let him know I was coming towards him, then he turned his head to the right to notice me but instead of slowing down or stopping he proceeded regardless to rush out into my way which would cause a T-Bone collision. I engaged my breaks to slow down but it was too late to stop in time, so I swerved to the right to avoid colliding with him.

As I swerved to the right, I noticed the car suddenly made a turn to the left and I turned to the left as well, similar to a crank course, to avoid collision as I would be in the middle of the car (to my left) and the road divider (to my right). With the little space I had I attempted to proceed forward while side swiping or grazing the car which forced me to the right to mount the divider and collide with either a lamp post or

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Accident Sketch Plan Pg. 1

**SINGAPORE
POLICE FORCE**

T/20180624/7007

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

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Report No. T/20180624/7007

CONTINUATION OF REPORT

road sign.

The collision caused my wife and myself to be flung over to the opposite side of the road. I recall being hit by something on my legs which caused a sharp pain and landed on the divider, with half my body on it and the other half on the road. I was scared and panicked and immediately shouted over to my wife to see if she if was ok, but didn't receive any response. I took off my helmet and shouted to my wife and for the public to help us.

A man rushed to me and identified himself as the driver of the car mentioned above, he kept apologising profusely to me and my wife a few times throughout saying "Sorry sorry, I'm sorry" as he attended to me and my wife. I also heard him complaining to someone that there are now scratches on his car. A construction worker attended to me as well and both him and the car driver identified themselves as trained medics and moved me to lay me flat on the road.

I handed over my phone to a passerby to call my brother to inform about the accident. The paramedics arrived in ambulances shortly and transferred my wife and I to Khoo Teck Puat Hospital.

I did not have any on vehicle cameras to capture the accident but as there are construction sites & traffic lights, there might be cameras around that may have captured the accident to assist Traffic Police in investigation. The accident has also come out in the news, where a resident at a block nearby, Ms Justina Tan, mentioned that she "heard a horn followed by a deafening crash".

You may find the article at the following link: <https://www.straitstimes.com/singapore/foreign-workers-praised-for-rushing-to-direct-traffic-after-accident-in-ang-mo-kio>

Due to the accident, I broke both my left and right femurs, tore a few ligaments in my left knee, injured my peroneal nerve which causes a foot drop on my left feet and have some bruises and abrasions. My wife suffered from some bruises, abrasion and cuts on her upper and lower extremities of her body. I have been in hospital ever since for treatment and I have been discharged as of 22nd June 2018.

I am submitting my account of what happened for the Police to investigate so my wife & I may get some compensation for our suffering.

Kindly assist us to do the needful, should my statement not be clear or if you have more questions, I am available for a call at 8128 5843.

Thank you very much.

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Accident Sketch Plan Pg. 1

**SINGAPORE
POLICE FORCE**

T/20180624/7007

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

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Report No. T/20180624/7007

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 / TPHQ / MOHAMED RIZWAN BIN IBRAHIM Contact No.: 65470000

Authentication Stamp
NP166

Signature Of Informant: The identity of the person making this report has been authenticated by SingPass. No signature is required.
Date/Time: 24/06/2018 20:46
Classification Of Case:

21-06-19:14:45 ;

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EROFIA MOTOR TRADING PTE LTD

No 1 Kaki Bukit Avenue 6 #02-62 AutoBay @ Kaki Bukit Singapore 417883

Tel : 67527740 Fax : 67528669

Co. Reg No. 201202259N

Owner : SYED SALEH S/O SYED
MOHIDEEN ABDUL KADER

Accident Date : 24.03.2018

Vehicle No : FX 6299 T

Vehicle Model : PIAGGIO X9

Estimated Repair Costs

<u>Qty</u>	<u>Description</u>	<u>Amount S(\$)</u>
	<u>List Items</u>	
1	Front fender	\$ 175.00
1	Front fairing	\$ 280.00
1	Front fairing inner panel	\$ 185.00
1	Windshield-upper	\$ 135.00
1	Windshield (lower)	\$ 220.00
1	Top inner panel	\$ 88.00
1	Compartment cover	\$ 85.00
2	Side mirrors	\$ 570.00
1	Front fork assy	\$ 750.00
1	Fork under bracket	\$ 175.00
1	Front sport rim	\$ 335.00
1	Front brake disc	\$ 195.00
1	Handle-bar	\$ 110.00
2	Handle-bar balancers	\$ 160.00
1	Brake lever	\$ 48.00
1	Headlamp	\$ 310.00
1	Front fairing bracket	\$ 285.00
1	Side cowling	\$ 280.00
1	Side lower panel	\$ 120.00
1	Lower belly cowling	\$ 195.00
1	Centre inner panel	\$ 135.00
2	Footstep panels	\$ 256.00
2	Footstep rubbers	\$ 90.00
2	Rear side panels	\$ 180.00
1	Rear end panel	\$ 88.00
2	Rear tailboards	\$ 520.00
1	Rear taillamp	\$ 180.00
1	Rear fender	\$ 165.00
1	Side stand	\$ 115.00
1	Main stand	\$ 180.00
1	Engine mounting bracket	\$ 280.00
1	Exhaust	\$ 460.00
1	Exhaust protector	\$ 48.00
1	Rear box	\$ 500.00
1	Rear box bracket (1 set)	\$ 280.00
		<u>\$ 8,178.00</u>
	Less 10%	<u>\$ 817.80</u>
		<u>\$ 7,360.20</u>

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c/f: \$ 7,360.20

Special Nett Items

1	Number plate (1 set)	\$	28.00
2	Fork oils	\$	60.00
2	Fork oil seals	\$	112.00
1	Steering cone (1 set)	\$	75.00
		\$	<u>275.00</u>

S/No.Labour

1	To provide towing service.	\$	45.00
2	To provide labour.	\$	380.00
3	To check wiring and reset headlamp focusing	\$	80.00
		\$	<u>505.00</u>

Grand Total

\$ 8,140.20

EROFIA MOTOR TRADING PTE LTD

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Vehicle Hub

Insurance Company Name: AIG ASIA PACIFIC INSURANCE PTE. LTD.

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**SINGAPORE
POLICE FORCE**

Traffic Police
10 Ubi Avenue 3
Singapore 408665
Tel +65 6547 0000
Fax +65 6547 6259
www.police.gov.sg

Your Ref :
Our Ref : TP/IP/19611/2018

Date : 16 January 2019

SYED SALLEH S/O SYED MOHIDEEN ABDUL KADER
BLK 812 ANG MO KIO AVENUE 4
#07-1123
SINGAPORE 560612

Dear Sir/Mdm,

ROAD TRAFFIC ACCIDENT INVOLVING FX6299T AND SLK3975S ALONG ANG MO KIO AVENUE 4 ON 24 MARCH 2018 AT 9.58 PM.

I refer to the above accident.

2. We have completed our investigations into the case. Our investigations revealed that the following offence(s) was/were disclosed against the driver/rider of **SLK3975S**:
 - **Causing Grievous Hurt by Negligent Act under Section 338(b) of the Penal Code, Chapter 224;**
 - **Causing Hurt by Negligent Act under Section 337(b) of the Penal Code, Chapter 224.**
3. Action has been initiated against the driver/rider for the aforesaid offence(s).
4. Should you need any clarification, please contact Investigation Officer Syed Zayid Muhammad at Tel: 6547 6394.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Zayid'.

**SYED ZAYID MUHAMMAD
for HEAD INVESTIGATION
TRAFFIC POLICE
SINGAPORE POLICE FORCE**

NP 510