

## Celine Fong (LKKAuto)

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**From:** Celine Fong (LKKAuto)  
**Sent:** Friday, 10 December 2021 3:56 PM  
**To:** Cooma & Rai  
**Cc:** assignments; SUR  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76  
**Attachments:** Comments.pdf

Dear Sir/Mdm,

We refer to your email above matter.

The following is our surveyor's comments:-

- a. the statements made by the repairer on the items they had disagreed with you;

[Our comments are within the AEIC of Lau Soon Poo. See attached.](#)

- b. the proper offer on COR to be made;

[Our recommended COR is \\$6,900.00.](#)

- c. the reasonable period for the repairs to be completed.

[The reasonable period for the repairs is 14 days.](#)

Best Regards,

**Celine Fong**

**LKK Auto Consultants Pte Ltd**

phone: 6256-3561 | email: [celinefong@lkkauto.com](mailto:celinefong@lkkauto.com) | fax: 6256-4315

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

---

**From:** Cooma & Rai <coomarai@singnet.com.sg>  
**Sent:** Friday, 10 December 2021 2:56 PM  
**To:** Celine Fong (LKKAuto) <celinefong@lkkauto.com>  
**Cc:** assignments <assignments@lkkauto.com>; SUR <sur@lkkauto.com>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76  
**Importance:** High

Dear Ms Celine,

This matter has been delayed for a long time. Your urgent response would be appreciated as we have to reply to the court's follow up by next Tuesday.

Regards

M/s Cooma & Rai

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**From:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Sent:** Thursday, 18 November 2021 3:39 pm  
**To:** 'Celine Fong (LKKAuto)' <[celinefong@lkkauto.com](mailto:celinefong@lkkauto.com)>  
**Cc:** 'assignments' <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; 'SUR' <[sur@lkkauto.com](mailto:sur@lkkauto.com)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Done

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**From:** Celine Fong (LKKAuto) <[celinefong@lkkauto.com](mailto:celinefong@lkkauto.com)>  
**Sent:** Thursday, 18 November 2021 3:03 pm  
**To:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Cc:** assignments <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; SUR <[sur@lkkauto.com](mailto:sur@lkkauto.com)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Hi,

Can consent another link? I have sent over for request

Best Regards,

**Celine Fong**

**LKK Auto Consultants Pte Ltd**

phone: 6256-3561 | email: [celinefong@lkkauto.com](mailto:celinefong@lkkauto.com) | fax: 6256-4315

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

---

**From:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Sent:** Thursday, 18 November 2021 2:57 PM  
**To:** Celine Fong (LKKAuto) <[celinefong@lkkauto.com](mailto:celinefong@lkkauto.com)>  
**Cc:** assignments <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; SUR <[sur@lkkauto.com](mailto:sur@lkkauto.com)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Hi Ms Celine,

Consent has been given. Do let us know if there is any other difficulty in downloading the 2 affidavits.

Regards

M P Rai

M/s Cooma & Rai

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**From:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Sent:** Thursday, 18 November 2021 1:32 pm  
**To:** 'Celine Fong (LKKAuto)' <[celinefong@lkkauto.com](mailto:celinefong@lkkauto.com)>  
**Cc:** 'assignments' <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; 'SUR' <[sur@lkkauto.com](mailto:sur@lkkauto.com)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76  
**Importance:** High

Hi Ms Celine,

We now have 2 affidavits from the repairer. Copies are enclosed via the links below:

[https://drive.google.com/file/d/1S0xdk0r947JbN9W5YejjC2-hISSU\\_gON/view?usp=sharing](https://drive.google.com/file/d/1S0xdk0r947JbN9W5YejjC2-hISSU_gON/view?usp=sharing)  
&  
[https://drive.google.com/file/d/1a\\_ufbu86R7buTwtKluSAJcUva20oki4Q/view?usp=sharing](https://drive.google.com/file/d/1a_ufbu86R7buTwtKluSAJcUva20oki4Q/view?usp=sharing)

Based on the contents of the said affidavits, please let us have your comments on:

- a. the statements made by the repairer on the items they had disagreed with you;
- b. the proper offer on COR to be made;
- c. the reasonable period for the repairs to be completed.

Please let us hear from you urgently as our mutual client has to be advised on the offer to be made by Wednesday next week.

Best Regards

**M P Rai**

**Cooma & Rai | Advocates & Solicitors | Notary Public | Commissioner for Oaths**

T +65 6438 0783 | F +65 6438 0784 | [coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg) | 133 New Bridge Road, #08-02 Chinatown Point, Singapore 059413 | [www.coomarai.com](http://www.coomarai.com) |

Office Hours: Mondays – Fridays from 9 am to 5.30 pm. We are closed for lunch between 1 pm and 2 pm. We are also closed on weekends and on Public Holidays.

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**From:** Celine Fong (LKKAuto) <[celinefong@lkkauto.com](mailto:celinefong@lkkauto.com)>  
**Sent:** Thursday, 1 July 2021 5:38 pm  
**To:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Cc:** assignments <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; SUR <[sur@lkkauto.com](mailto:sur@lkkauto.com)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Dear Sir/Mdm,

Apologise for the late reply.

We refer to your email above matter.

The following is our comments:-

1. For those items which LKK stated as “Serviceable” and hence, disallowed the costs of the items, please ask LKK to explain why they were serviceable and provide evidence of the same i.e. from the photographs available plus any other evidence. Please also ask LKK to clarify whether “serviceable” means the particular part was not damaged and hence, could be re-used or the particular part was damaged but repairable.

Cabin rear windscreen glass rubber – No damage (See photo 1)

Cab front panel sealant – No damage

Front grille clips – Re-used

Tailgate graphic stickers – Not change (See photo 2)

Rear lamps assy – Not change (See photo 3 & 4)

Rear lamp brackets – Not change (See photo 3 & 4)

Rear underrun bumper assy – Not change (See photo 5 & 6)

2. For those items which LKK did not agree with the costs of the parts recommended by KM Auto, please ask LKK to provide documentary proof for the amounts recommended by LKK.

The recommended prices are typically the prices in the market for these items.

3. Under Labour, we note that there are 4 disputed items. For two of the items, LKK stated in their report that the labour charges were not necessary. Please ask LKK to explain why they were not necessary. As for the two items which LKK reduced the charges, please ask the SJE to explain the basis for LKK's recommendation.

Jack out, straighten up and realign main chassis frame assy. – Not Necessary (See photo 7 to 10, No supporting photos & documents)

Remove cabin rear windscreen glass to enable necessary repair. Renew glass rubber and refit glass assy. – Not Necessary (No damage to glass rubber unnecessary labour)

Tailgate hydraulic cylinder pumps assy-short – Local repair (See photo 13 & 14)

Tailgate hydraulic cylinder pumps assy-long – Local repair (See photo 11 & 12)

Hope the above clarifies.

Best Regards,

**Celine Fong**

**LKK Auto Consultants Pte Ltd**

phone: 6256-3561 | email: [celinefong@lkkauto.com](mailto:celinefong@lkkauto.com) | fax: 6256-4315

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

---

**From:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>

**Sent:** Tuesday, 29 June 2021 2:44 PM

**To:** Shirley Hiew (LKK Auto) <[ShirleyHiew@lkkauto.com](mailto:ShirleyHiew@lkkauto.com)>

**Cc:** assignments <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; SUR <[sur@lkkauto.com](mailto:sur@lkkauto.com)>

**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

**Importance:** High

Dear Ms Shirley,

This matter has dragged for too long and the opposing counsel is chasing us for answers.

Please let us have your reply by this week without further delay as the matter has to be set down for hearing next Monday. Failure to provide the answers will prejudice your position when the hearing date is fixed.

Best Regards

**M P Rai**

**Cooma & Rai | Advocates & Solicitors | Notary Public | Commissioner for Oaths**

T +65 6438 0783 | F +65 6438 0784 | [coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg) | 133 New Bridge Road, #08-02 Chinatown Point, Singapore 059413 | [www.coomarai.com](http://www.coomarai.com) |

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**From:** Cooma & Rai <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Sent:** Monday, 26 April 2021 4:10 pm  
**To:** 'Shirley Hiew (LKK Auto)' <[ShirleyHiew@lkkauto.com](mailto:ShirleyHiew@lkkauto.com)>  
**Cc:** 'assignments' <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; 'SUR' <[sur@lkkauto.com](mailto:sur@lkkauto.com)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76  
**Importance:** High

Dear Ms Shirley,

Your urgent response would be appreciated.

Best Regards

**M P Rai**

**Cooma & Rai | Advocates & Solicitors | Notary Public | Commissioner for Oaths**

T +65 6438 0783 | F +65 6438 0784 | [coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg) | 133 New Bridge Road, #08-02 Chinatown Point, Singapore 059413 | [www.coomarai.com](http://www.coomarai.com) |

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**From:** Ruthra <[ruthra@coomarai.com](mailto:ruthra@coomarai.com)>  
**Sent:** Friday, 16 April 2021 10:50 am  
**To:** 'Shirley Hiew (LKK Auto)' <[ShirleyHiew@lkkauto.com](mailto:ShirleyHiew@lkkauto.com)>  
**Cc:** 'assignments' <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; 'SUR' <[sur@lkkauto.com](mailto:sur@lkkauto.com)>; 'Cooma & Rai' <[coomarai@singnet.com.sg](mailto:coomarai@singnet.com.sg)>  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76  
**Importance:** High

Dear Shirley,

The lawyers for the Plaintiff/workshop has asked the following questions:

Quote

**Issues for LKK to address :-**

1. For those items which LKK stated as "Serviceable" and hence, disallowed the costs of the items, please ask LKK to explain why they were serviceable and provide evidence of the same i.e. from the photographs available plus any other evidence. Please also ask LKK to clarify whether "serviceable" means the particular part was not damaged and hence, could be re-used or the particular part was damaged but repairable.
2. For those items which LKK did not agree with the costs of the parts recommended by KM Auto, please ask LKK to provide documentary proof for the amounts recommended by LKK.
3. Under Labour, we note that there are 4 disputed items. For two of the items, LKK stated in their report that the labour charges were not necessary. Please ask LKK to explain why they were not necessary. As for the two items which LKK reduced the charges, please ask the SJE to explain the basis for LKK's recommendation.

Unquote

We would be obliged to receive your reply soon.

Regards

M P Rai  
M/s Cooma & Rai

---

**From:** Shirley Hiew (LKK Auto) <[ShirleyHiew@lkkauto.com](mailto:ShirleyHiew@lkkauto.com)>  
**Sent:** Friday, 16 October 2020 11:01 am  
**To:** [ruthra@coomarai.com](mailto:ruthra@coomarai.com)  
**Cc:** assignments <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>; SUR <[sur@lkkauto.com](mailto:sur@lkkauto.com)>; [vicky@coomarai.com](mailto:vicky@coomarai.com); [su@coomarai.com](mailto:su@coomarai.com)  
**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Dear Ruthra,

We refer to your below email above matter.

1. Why is there such a great difference in the two assessments, listing the areas of difference, the sums involved and the reason(s) for the difference?

item 1: tailgate hydraulic cylinder pumps assy - short from \$2400 reduce to labour \$400

item 2: tailgate hydraulic cylinder pumps assy - long from \$3000 reduce to labour \$400 during after repair inspection I found 2 items used back after repair, the benefit of the doubt I can only approved for labour.

2. What is the prudent sum for COR that Lonpac should offer to resolve the dispute?

\$6900

3. What is the prudent period for repairs that Lonpac should offer to resolve the dispute? And

14 days

4. Any other matter that you may wish to state or highlight that would assist in the defence of the claim made by the third party.

COR will be review when additional evidence provided.

Thank you.

Best Regards,

Shirley Hiew | Case Handler

**LKK Auto Consultants Pte Ltd**

Phone: 6256-3561 | email: [Sur@lkkauto.com](mailto:Sur@lkkauto.com) | fax: 6256-4315  
Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

**Note: We are on work from home arrangement. All correspondence should be made via email. Submission of claim related documents will be in softcopy. Any inconvenience caused is much regretted.**

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**From:** Ruthra <[ruthra@coomarai.com](mailto:ruthra@coomarai.com)>

**Sent:** Thursday, 8 October 2020 2:53 PM

**To:** Admin-D (LKKAuto) <[admin-d@lkkauto.com](mailto:admin-d@lkkauto.com)>; assignments <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>

**Cc:** 'Vicky' <[vicky@coomarai.com](mailto:vicky@coomarai.com)>; [su@coomarai.com](mailto:su@coomarai.com)

**Subject:** RE: Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Dear Sirs,

**MC/MC 6349/2020**

We refer to our email dated 20 July 2020 ("our email").

Kindly let us have your response to our email on an **urgent basis**.

Thank you.

Best Regards,

**Ruthra Ram**

**Cooma & Rai | Legal Associate**

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---

**From:** Ruthra [<mailto:ruthra@coomarai.com>]  
**Sent:** Monday, 20 July, 2020 4:25 PM  
**To:** 'admin-d@lkkauto.com' <[admin-d@lkkauto.com](mailto:admin-d@lkkauto.com)>; 'assignments@lkkauto.com' <[assignments@lkkauto.com](mailto:assignments@lkkauto.com)>  
**Cc:** 'Vicky' <[vicky@coomarai.com](mailto:vicky@coomarai.com)>; 'su@coomarai.com' <[su@coomarai.com](mailto:su@coomarai.com)>  
**Subject:** Your Ref: CS3/LPC19021451/Gsf3e2-1 | Our Ref: MPR/205404/L76

Dear Sirs,

**MC/MC 6349/2020**

We act for Lonpac Insurance Bhd (Lonpac).

Our client had engaged you to inspect the third party's vehicle no.YP 6245R. Our clients subsequently received a Report from you dated 20.03.2020.

The Third Party has now made a claim through their lawyers, M/s Kuru & Co. The items in dispute are the COR claimed by the third party at \$14,900 (excluding GST), based on a lump sum basis, and the period for repairs at 24 days. This is based on the survey report prepared by KM Auto Assessors Pte Ltd. A copy of their report is attached via dropbox link below for your reference.

<https://www.dropbox.com/s/p73w4p4d7acvp8z/km%20report.zip?dl=0>

In contrast, in your PRI report, you had assessed the COR at \$6,900 and the period of repairs at 14 days.

The difference between the two assessments on the COR is substantial.

As litigation has been commenced and in order to advise our clients on the prudent offer to make to protect their interest at an early stage, we would be obliged if you could review the gulf in the COR and period for repairs, and let us know the following:

1. Why is there such a great difference in the two assessments, listing the areas of difference, the sums involved and the reason(s) for the difference?
2. What is the prudent sum for COR that Lonpac should offer to resolve the dispute?
3. What is the prudent period for repairs that Lonpac should offer to resolve the dispute? And
4. Any other matter that you may wish to state or highlight that would assist in the defence of the claim made by the third party.

We look forward to hearing from you urgently as we have to advise Lonpac and make a prudent protective offer as soon as possible.

Thank you.

Best Regards,  
**Ruthra Ram**

**Cooma & Rai | Legal Associate**

T +65 6438 0783 | F +65 6438 0784 | [ruthra@coomarai.com](mailto:ruthra@coomarai.com) | 133 New Bridge Road  
#08-02 Chinatown Point, Singapore 059413 | [www.coomarai.com](http://www.coomarai.com) | Office Hours: Mondays – Fridays from 9 am to 5.30 pm. We are closed for lunch between 1 pm and 2 pm. We are also closed on weekends and on Public Holidays.

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