

Summer Lee (LKK Auto)

From: Lionel Chua <lionel.chua@sg.cntaiping.com>
Sent: Thursday, 19 November, 2020 2:19 PM
To: Kuru & Co; sur@lkkauto.com; assignments@lkkauto.com
Cc: Claims Dept of CTI; Chee So Chow; Albert Chua
Subject: RE: 2 CLEAR DAYS NOTICE | KURU REF: L19.1339.OLY | CHINA REF: SNM 19D204878/C02/SKV415R/CHUAKK | CLAIMANT: MOHD ANUAR BIN MD YUSOP
Attachments: 20201119141636.pdf

WITHOUT PREJUDICE

Your Ref: L19.1339.OLY

Our Ref: SNM19D204878/C02/SKV415R/TANGHL2

We refer to your email below.

As regard to your client's request for \$120 at downtime fee, we are not able to accept of the said request and does not expect the reinspection will take less than 1 hour. Nevertheless, we are prepared to pay for reasonable downtime fees. May we know what is your reasonable proposal? We hereby shall be deprived of our rights with regard of the NIMA protocol on the above matter.

Dear LKK,

Kindly refer to below email with detail and liaise with third party workshop with proceed to conduct a re-inspection on the third-party vehicle.

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Thank you & Best regards.

Lionel Chua

Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.

3 Anson Road #15-00 Springleaf Tower Singapore 079909

Tel: (65) 63896116 | F: (65) 62247175

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

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From: Kuru & Co <kurulegal@yahoo.com.sg>

Sent: Thursday, November 19, 2020 12:58 PM

To: Lionel Chua <lionel.chua@sg.cntaiping.com>

Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Chee So Chow <sochow.chee@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>

Subject: Re: 2 CLEAR DAYS NOTICE | KURU REF: L19.1339.OLY | CHINA REF: SNM
19D204878/C02/SKV415R/CHUAKK | CLAIMANT: MOHD ANUAR BIN MD YUSOP

Dear Lionel,

We refer to your email below.

We may arrange for the re-inspection on condition that we are provided with a free copy of the re-inspection report and that you compensate our client **\$120.00** for his loss of use.

Subject to your agreement on the above, you may arrange to re-inspect our client's vehicle on

Date: 24 November 2020 (Tuesday)

Time: 10.00 am

Place : Blk 9005 Tampines St 93, #01-252 Tampines Industrial Park A, Singapore 528839

Regards,

Judy Tan
Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009
Fax: 6532 2007

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On Wednesday, 18 November 2020, 10:56:35 am SGT, Lionel Chua <lionel.chua@sg.cntaiping.com> wrote:

Without Prejudice
Save as to Cost

Your Ref: L.19.1339.OLY
Our Ref: SNM19D204878/C02/SKV415R/TANGHL2

Dear Judy,

We refer to the above accident.

We still require a physical inspection of your client's vehicle. This will be better for us to assess the quantum.

As such, we would appreciate if you could arrange a scheduled time, date and venue for this re-inspection of your client's vehicle.

Meanwhile, please hold hands on legal proceeding.

We look forward to hear from you soon.

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Thank you & Best regards.

Lionel Chua

Claims Department

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3 Anson Road #15-00 Springleaf Tower Singapore 079909

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From: Kuru & Co <kurulegal@yahoo.com.sg>
Sent: Wednesday, November 18, 2020 10:27 AM
To: Lionel Chua <lionel.chua@sg.cntaiping.com>
Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Chee So Chow <sochow.chee@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>
Subject: Re: 2 CLEAR DAYS NOTICE | KURU REF: L19.1339.OLY | CHINA REF: SNM 19D204878/C02/SKV415R/CHUAKK | CLAIMANT: MOHD ANUAR BIN MD YUSOP

Dear Lionel,

We refer to your email dated 17 November 2020.

We wish to enlighten you that under the provisions of the Pre-Action Protocol for Non-Injury Motor Accident Cases ("NIMA Protocol"), the "Pre-repair inspection" is to give the insurers concerned to have an opportunity to inspect the physical damage(s) caused to the vehicle in order to prevent excess or fraud claim.

There is no provision provided in the NIMA Protocol that the Claimant must provide an estimate costs of repair at the time of inspection.

We are instructed that your appointed surveyor has conducted the following:-

Pre-repair inspection (before dismantling) on 22 October 2019;

Pre-repair inspection (after dismantling) on 23 October 2019;

Post-repair inspection on 26 October 2019.

We are unable to advise our client to consider your surveyor's estimated cost of repair.

You may wish to re-assign your surveyor to conduct a paper re-survey and let us have your reasonable offer within the next 14 days from date hereof.

Regards,

Judy Tan

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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On Tuesday, 17 November 2020, 1:27:57 pm SGT, Lionel Chua <lionel.chua@sg.cntaiping.com> wrote:

WITHOUT PREJUDICE
SAVE AS TO COSTS

Your Ref: L.19.1339.OLY

Our Ref: SNM19D204878/C03/SKV415R/tanghl2

Dear Sirs/Madam,

ACCIDENT INVOLVING SKV415R & MOHD ANUAR BIN MD YUSOP (DRIVER OF SKP3560R) ON 14.10.2019

We refer to the above caption.

We wish to inform you that your client's workshop was not cooperative with our surveyor during the pre-repair inspection and our surveyor's has recommended based on the visual inspection of the damage during the pre-repair survey in the region of the estimated repair cost that should not exceed of \$4,000.00 - \$5,000.00 of the said claim.

On a without admission of liability, Hence we reiterate to resolve this claim at a global sum of \$10,300.00 (all-in) on both PD and PI to meet an amicable settlement.

We shall be grateful if you could revert with your client's acceptance and hold your hands in the meantime.

We look forward to hear from you soon.

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Thank you & Best regards.

Lionel Chua

Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.

3 Anson Road #15-00 Springleaf Tower Singapore 079909

Tel: (65) 63896116 | F: (65) 62247175

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From: Kuru & Co <kurulegal@yahoo.com.sg>

Sent: Monday, November 16, 2020 7:53 PM

To: Lionel Chua <lionel.chua@sg.cntaiping.com>

Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Chee So Chow <sochow.chee@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>

Subject: Re: 2 CLEAR DAYS NOTICE | KURU REF: L19.1339.OLY | CHINA REF: SNM 19D204878/C02/SKV415R/CHUAKK | CLAIMANT: MOHD ANUAR BIN MD YUSOP

Dear Lionel,

We refer to your email of even date attaching LKK's surveyor report.

We note that the parts and labour descriptions were not indicated and the recommended cost of repair was not accounted for.

Please let us have LKK's basis for the said recommendation.

Regards,

Judy Tan

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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On Monday, 16 November 2020, 5:58:39 pm SGT, Lionel Chua <lionel.chua@sg.cntaiping.com> wrote:

WITHOUT PREJUDICE
SAVE AS TO COSTS

Your Ref: L.19.1339.OLY
Our Ref: SNM19D204878/C03/SKV415R/tanghl2

Dear Sirs/Madam,

ACCIDENT INVOLVING SKV415R & MOHD ANUAR BIN MD YUSOP (DRIVER OF SKP3560R) ON 14.10.2019

We refer to your email below, our sincere apologies for the late response on the captioned matter.

As per your requested, we enclose a copy of our survey reports by LKK Auto Consultants Pte Ltd for your attention.

In the meantime, please hold hands and ask your clients to consider the offer of **\$10,300.00 (all-in)** on both PD and PI at our global basis with this acceptance.

We shall hold our rights to call a physical inspection of your client's vehicle, if the above offer is still not accepted.

We look forward to hear from you soon.

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Thank you & Best regards.

Lionel Chua

Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.

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From: Kuru & Co <kurulegal@yahoo.com.sg>

Sent: Monday, November 16, 2020 9:32 AM

To: Lionel Chua <lionel.chua@sg.cntaiping.com>

Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Chee So Chow <sochow.chee@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>

Subject: Re: 2 CLEAR DAYS NOTICE | KURU REF: L19.1339.OLY | CHINA REF: SNM
19D204878/C02/SKV415R/CHUAKK | CLAIMANT: MOHD ANUAR BIN MD YUSOP

Dear Lionel,

We refer to our email dated 2 November 2020.

Please let us have the surveyor report soonest possible, in order for us to take our client's instructions.

Regards,

Lay Yen

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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On Monday, 2 November 2020, 2:39:25 pm SGT, Kuru & Co <kurulegal@yahoo.com.sg> wrote:

Dear Lionel,

We refer to your email dated 29 October 2020.

Please let us have your surveyor's report in order for us to take our client's instructions.

Regards,

Judy Tan

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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On Thursday, 29 October 2020, 2:14:06 pm SGT, Lionel Chua <lionel.chua@sg.cntaiping.com> wrote:

WITHOUT PREJUDICE
SAVE AS TO COSTS

Your Ref: L.19.1339.lt(jt) (PD+PI)
Our Ref: SNM19D204878/C02/SKV415R/CHUAKK

Dear Sirs/Madam,

ACCIDENT INVOLVING SKV415R & MOHD ANUAR BIN MD YUSOP (DRIVER OF SKP3560R) ON 14.10.2019

We refer to your email of 28 October 2020 pertaining to the above matter.

Having perused both the documents, we are of our view that your client's injury was reasonable mild and the medical leave was showing not more than 3 days for this accident case.

We regret that we are unable to accept your proposed offer on the costs of repair of \$11,500.00, as our professional surveyor, LKK Auto Consultants Pte Ltd had adjusted the repair cost to \$4,000.00 and we have to adhere to our surveyor's recommendation pertaining to this claim.

For the purpose of facilitating an amicable settlement, we have reviewed and prepared to revise our offer upward at a global sum of **\$10,300.00** all-inclusive to avoid escalation on costs of said claim. Which we opine is fair and reasonable in this settlement.

Meanwhile, please hold hands on legal proceeding and re-consider to revert with your client's acceptance.

We look forward to hear from you soon.

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Thank you & Best regards.

Lionel Chua

Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.

3 Anson Road #15-00 Springleaf Tower Singapore 079909

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From: Kuru & Co <kurulegal@yahoo.com.sg>
Sent: Thursday, October 29, 2020 12:49 PM
To: Lionel Chua <lionel.chua@sg.cntaiping.com>; Claims Dept of CTI <claimsdept@sg.cntaiping.com>
Cc: Chee So Chow <sochow.chee@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>
Subject: Re: 2 CLEAR DAYS NOTICE | KURU REF: L.19.1339.OLY | CHINA REF: SNM
19D204878/C02/SKV415R/CHUAKK | CLAIMANT: MOHD ANUAR BIN MD YUSOP

Dear Lionel,

We refer to our counter proposal via email dated 19 October 2020.

Please let us have your revised offer soonest possible.

Regards,

Lay Yen

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building

Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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On Monday, 19 October 2020, 3:38:31 pm SGT, Claims Dept of CTI <claimsdept@sg.cntaiping.com> wrote:

Dear Lionel,

Please refer to the append email and revert soonest possible.

Kindly quote our claim reference number when replying.

-

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Thank you.

Angie Foo

Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.

3 Anson Road #15-00 Springleaf Tower Singapore 079909

DID: (65) 63896116 | M: (65) 62247175 | F: (65) 6222 1033

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From: Kuru & Co <kurulegal@yahoo.com.sg>
Sent: Monday, October 19, 2020 9:09 AM
To: Ben Tang <Ben.Tang@sg.cntaiping.com>
Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Chee So Chow <sochow.chee@sg.cntaiping.com>; Alfred Toh <alfred.toh@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>; Lionel Chua <lionel.chua@sg.cntaiping.com>
Subject: Re: 2 CLEAR DAYS NOTICE | KURU REF: L.19.1339.OLY | CHINA REF: SNM 19D204878/SKV415R/BEN | ACC INVL SKP 3560R AND SKV 415R ON 14.10.2019 - CLAIMANT MOHD ANUAR BIN MD YUSOP

WITHOUT PREJUDICE

Dear Ben,

We refer to your email dated 25 September 2020.

Purely for an amicable settlement, we propose:-

General Damages	\$ 4,000.00
Medical expenses	\$ 315.65
Transport expenses	\$ 80.00
Cost of repair	\$11,500.00
Rental	\$ 1,765.50
Survey Fee	\$ 962.00
Medical report fee	\$ 160.50
LTA fee	\$ 7.49
Incidentals	\$ 53.50
Costs inclusive of GST	<u>\$ 2,461.00</u>
	<u>\$21,305.64</u>

Kindly let us hear from you soon.

Regards,

Judy Tan

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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On Friday, 25 September 2020, 11:27:33 am SGT, Ben Tang <ben.tang@sg.cntaiping.com> wrote:

WITHOUT PREJUDICE

SAVE AS TO COSTS

Dear Sir

We refer to above matter.

We are prepared to settle your client's claim as follows:

General damages	\$2,000.00
Medical expenses	\$315.65
Transport expenses	\$60.00
Medical report fee	\$160.50

Lta	\$7.49
Cost of repair	\$4,000.00
Loss of rental(\$120x5)	\$600.00
Survey fee	\$962.00
Costs + Disbs	<u>\$1,700.00</u>
Total	<u>\$9,805.64</u>

Please confirm acceptance, thank you.

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Best Regards

Ben Tang

Executive

Claims Department

China Taiping Insurance (Singapore) Pte. Ltd.

3 Anson Road #15-00 Springleaf Tower Singapore 079909

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From: Kuru & Co <kurulegal@yahoo.com.sg>
Sent: Thursday, September 24, 2020 9:13 AM
To: Ben Tang <Ben.Tang@sg.cntaiping.com>
Cc: Claims Dept of CTI <claimsdept@sg.cntaiping.com>; Chee So Chow <sochow.chee@sg.cntaiping.com>; Alfred Toh <alfred.toh@sg.cntaiping.com>; Albert Chua <albert.chua@sg.cntaiping.com>
Subject: 2 CLEAR DAYS NOTICE | KURU REF: L.19.1339.OLY | CHINA REF: SNM 19D204878/SKV415R/BEN | ACC INV L SKP 3560R AND SKV 415R ON 14.10.2019 - CLAIMANT MOHD ANUAR BIN MD YUSOP

VIA EMAIL ONLY

KURU REF: L.19.1339.OLY

CHINA REF: SNM 19D204878/SKV415R/BEN

Dear Sirs,

ACCIDENT INVOLVING SKP 3560R AND SKV 415R ON 14.10.2019

AT/ALONG LOYANG AVENUE TOWARDS TPE

INJURED: MOHD ANUAR BIN MD YUSOP

We refer to the above matter.

We regret that despite reasonable effort having been made to settle our client's claim, there does not appear to be any reasonable prospects of settlement.

We hereby give you **2 clear days'** notice that our client intends to proceed with the issue of a Writ of Summons against your insured. In this regard, please let us know if you are instructing solicitors to accept service of process on your insured's behalf.

Lay Yen

Kuru & Co
150 South Bridge Road
#04-06 Fook Hai Building
Singapore 058727
Tel: 6532 2009

Fax: 6532 2007

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