

# EVEREST LAW LLC

Advocates & Solicitors

UEN No. 201943895D

151 Chin Swee Road, #12-12 Manhattan House, Singapore 169876

Tel: 69707502 Fax: 69707503

We do not accept service of court documents by facsimile.

Our ref : TA.2020.2814.ya(b)  
Your ref : SH9952B

8 March 2021

India International Insurance Pte Ltd  
64 Cecil Street,  
#04/#05 IOB Building,  
Singapore 049711  
Attn: Motor Claims Department

For your information only  
Owner of SH9952B

Dear Sir/Madam,

**CLAIMANT: LIM LIAN PANG - WITHOUT PREJUDICE**  
**ACCIDENT INVOLVING SLM3328A & SH9952B ON 24 DECEMBER 2020 ALONG UPPER PAYA LEBAR ROAD AT ABOUT 2245 HOURS**

We act for LIM LIAN PANG, the owner of vehicle no. SLM3328A, whose vehicle was damaged as a result of the abovementioned accident by vehicle no. SH9952B and our search reveals that you were the insurer of motor vehicle no. SH9952B at the time of the accident.

We are instructed that the accident was caused by your insured's negligent driving and/or management of the vehicle. As a result of the accident, our client's vehicle was damaged, and our client has been put to loss and expense, particulars of which are as follows:

1.	Costs of repair	\$18,204.01
2.	Rental fee	\$2,160
3.	Survey report fee	\$1,089
4.	LTA search fee	\$7.49
5.	GIA search / report fee	\$29.00
6.	Incidentals	\$80.00
7.	Costs	\$900.00
		<u>\$22,469.50</u>

We enclose herewith copies of the following documents supporting our client's claim for your attention:

1. GIA report for vehicle no. SLM3328A;
2. LTA/GIA search/report fee for SH9952B;
3. Final Repair Bill;
4. Rental agreement.
5. Survey report (enclosing original photographs) depicting damage to SLM3328A.

Please note that if you are insured and you wish to claim your insurance policy, you should immediately pass this letter and all the enclosed documents to your insurer. You should send to us an acknowledgement of receipt of this letter within 14 days from the receipt of this letter, failing which our client will have no alternative but to commence proceedings against you without further notice to you or your insurer.

Please take notice that there is a presumption in law that the said driver was driving as your servant and/or agent and if we do not hear from you within seven (7) days from the date hereof, you will be named as a Defendant if we commence proceedings in court (if any). If you are not the driver at the time of the accident, please let us have the driver's details within the next 7 days hereof.

Please also note that if you have a counterclaim against our client arising out of the accident, you are also required to send to us a letter giving full particulars of the counterclaim together with all relevant supporting documents within 8 weeks of your receipt of this letter.

  
Yours faithfully

Tiwary Anuradha (Ms)  
Everest Law LLC

Enc.

Confidentiality Notice: This letter is confidential. It may also be legally privileged.

If you are not the addressee or to whom it is intended, you may not copy, forward, disclose or use any part of it.

If you have received this message in error, please delete the message and all copies from your system and notify the sender immediately by e-mail.

## 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 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. 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 Submission	26/12/2020 11:09 (SGT)
Date of Accident	24/12/2020 22:45 (SGT)
Exact Location of Accident	Upper Paya Lebar Rd, Singapore
Additional Location Information	-
Country/State of Loss	Singapore

### DETAILS OF OWN VEHICLE

Vehicle Registration Number	SLM3328A
INSURED/POLICYHOLDER	
Is company?	No
Name Of Registered Owner	LIM LIAN PANG
NRIC No	SXXXX950J
Email Address	sophieyh.lim@gmail.com
Mobile Phone No	(Phone) +65-96204991
Alternative Phone No	+65-96204991

### VEHICLE PARTICULARS

Manufacturer	Volkswagen
Model	Golf
Variant	-
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 - Claiming third party
Vehicle Category	Private car

### INSURANCE COMPANY

Name of Insurance Company	China Taiping Insurance
Type of Coverage	Comprehensive
Fleet Policy	No
Policy Number	DMPCSNW00027962002
Cover Note Number	-

### DRIVER

Name of Driver	SOPHIE LIM YIN HUI
NRIC No	SXXXX553J
Date Of Birth	14/11/1994
Occupation	Indoor

Date Of Driving Pass	02/09/2013
Driving experience	7 YEARS AND 3 MONTHS
Gender	Female
Mobile Number	(Phone) +65-94756345
Alt. Phone Number	-
Email Address	sophieyh.lim@gmail.com
Address	187 TAI KENG GARDENS
Address complement	-
Postcode	534364
Is the driver the policyholder?	No
If No, Relationship of the Driver with the Insured	Child
Does Driver Own Other Vehicles?	No
Vehicle Registration Number of Other Vehicle Owned by Driver	-
Insurance Company of Other Vehicle Owned by Driver	-

#### GENERAL INFORMATION OF THE ACCIDENT

Type of Accident	Collision - Change/cross lane
Weather Conditions	Clear
Road Surface	Dry

#### OTHER INFORMATION

Was any foreign vehicle involved in the accident?	No
Number of vehicles involved in the accident	2
Was anybody injured in the Accident?	No
Was any injured conveyed to hospital by ambulance?	-
Was any other material or property damaged?	Yes
Number of Passengers (Including Driver)	1
Has the driver been approached by unknown person(s) soliciting/offering accident claims assistance?	No

#### DETAILS OF POLICE ACTION

Was the accident reported to the police?	No
Was notice of intended Prosecution given?	No
If yes, against whom?	-

#### CIRCUMSTANCES OF ACCIDENT

#### REFER TO STATEMENT.

#### ATTACHMENT(S)

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

#### DETAILS OF OTHER VEHICLE PROPERTY 1

Vehicle Registration Number	SH9952B
Vehicle Manufacturer	-
Vehicle Model	-
Vehicle Variant	-
Vehicle Colour	-
Vehicle Category	Taxi
Name of Driver	-
Contact Number	-
Address	-
Address complement	-
Postcode	-
Insurance Company Name	-

Nature Of Damage  
Details of property damaged in accident  
No. Of Passenger (Including Driver)

-  
-  
-

**SKETCH PLAN**

**IMPORTANT NOTICE**

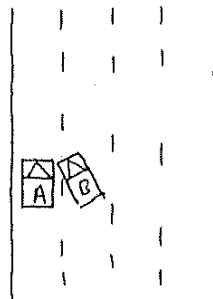
1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Authorised Driver.
3. Information provided must be as truthful and accurate as possible. Any wilful misrepresentation or withholding of material facts may 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 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.

Policyholder's Signature / Date & Time

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

Witnessed by Reporting Centre Personnel

**Sketch Plan**



A = SLM 3328 A

B = SH 9952 B

Upp Paya Lebar Rd

Describe Circumstances of the Accident

On 24/12/20 at 10:45 PM, I was driving on Upper Paya Lebar Road light outside the Breadtalk Building. I was switching from the 3rd to the extreme left lane with the intention to turn left to Airport Road. A Comfort taxi <sup>^</sup>swerved from the 2nd lane and into my path with the intention to pick up passengers from the left side of the road. Taxi did not signal left and drove into my path without checking for oncoming traffic, and crashed ~~on~~ <sup>my</sup> into the right front bumper.

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



# Thank you

Ang Shi Fun Yvonne has successfully logged out.

Your last login date and time was 29 Dec 2020, 07:54:45.

To return to ONE.MOTORING, please click [here](#)

For security reasons, please **CLEAR YOUR CACHE** after each session.

## Session Transaction History

S/No.	Asset Type	Asset ID	Asset Owner ID	Transaction Type	Transaction Amount (\$)	Log Date/Time
1	Vehicle	SH9952B	-	18.19 Enquire Veh Owner Info (Others) by Law Firm	7.49	29 Dec 2020 / 07:55:33
2	Vehicle	SH9952B	-	18.19 Enquire Veh Owner Info (Others) by Law Firm	7.49	29 Dec 2020 / 07:55:33

**CARS 88 LEASING PTE LTD**

7030 ANG MO KIO AVE 5  
#02-16 NORTHSTAR @ AMK  
SINGAPORE 569880

UEN No.201624377R

2814

# Invoice

**Bill To:**

GLATT AUTO KIT PRIVATE LIMITED  
1 KAKI BUKIT AVE 6  
#01-53  
AUTOBAY @ KAKI BUKIT  
417883

**Send To:**

GLATT AUTO KIT PRIVATE LIMITED  
1 KAKI BUKIT AVE 6  
#01-53  
AUTOBAY @ KAKI BUKIT  
417883

Invoice No :	00013637
Date :	30/12/2020
Page :	1

SalesPerson	P.O. Number	Date Shipped	Shipped Via	Terms
	SMR2911J			Net 30th after EOM

Description	Car Plate	Car Description	Amount (\$\$)
VEHICLE NO: SMR2911J BILLING PERIOD: 28/12/2020 - 21/1/2021 (24 DAYS) RENTAL RATE: \$90/DAYS	SMR2911J	AUDI A3	\$2,160.00

Memo:	Total	\$2,160.00
	Add: GST	\$0.00
	Total Inc GST	\$2,160.00
	Less: Paid	\$2,160.00
E. & O. E	Balance Due	\$0.00



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# Glatt Auto Kit Pte Ltd

No.1 Kaki Bukit Avenue 6 Autobay, #01-53, Singapore 417883  
Tel: 9225 6656

Vehicle No: SLM 3328 A Date: 1-Feb-21  
Model: Volkswagen Golf  
Name: Lim Lian Pang  
Address: c/o No.1 Kaki Bukit Avenue 6  
#01-53 Autobay  
Singapore 417883  
Accident date: 24-Dec-20

## Part By Part repair of SLM 3328 A

Qty	Descriptions	Amount (\$\$)
<b>List Items</b>		
1	Front o/s headlamp	\$ 2,330.82
1	Front bumper	\$ 1,443.20
1	Front bumper bracket	\$ 72.85
1	Front bumper side retainer	\$ 27.90
1	Front bumper lower grille	\$ 191.41
1	Front bumper o/s fog lamp	\$ 265.79
1	Front bumper o/s fog lamp grille	\$ 122.55
1	Front o/s nozzle spray pen	\$ 166.92
1	O/s side skirt	\$ 1,705.00
1	O/s side skirt retainer	\$ 101.00
1	Front o/s fender	\$ 667.36
1	Front o/s fender inner shield	\$ 158.76
1	Front o/s fender air guide	\$ 78.68
1	Front o/s fender inner garnish	\$ 63.00
1	Front o/s wheel hub c/w bearing	\$ 517.18
1	Front o/s shock absorber	\$ 310.40
1	Front o/s knuckle arm	\$ 329.65
1	Front o/s lower arm	\$ 375.31
1	Front o/s lower arm ball joint	\$ 133.72
1	Front steering rack cross member	\$ 795.00
1	Front steering tie rod	\$ 114.48
1	Front steering tie rod end	\$ 152.22
1	Front o/s driveshaft	\$ 2,714.59
		\$ 12,837.79
	Less 10.0%	\$ 1,283.78
		\$ 11,554.01
<b>Special Nett Items</b>		
1	Front o/s tyre (depreciation)	\$ 240.00
4	Front o/s sport rims (1 set)	\$ 3,000.00
1	Front headlamp sticker	\$ 90.00
		\$ 3,330.00

<u>S/N</u>	<u>Labour</u>	
1	To remove and refit headlamps.	\$ 40.00
2	To remove and refit front undercarriage.	\$ 400.00
3	To remove and refit wheel alignment.	\$ 120.00
4	Panel beating	\$ 1,320.00
5	Spray painting	\$ 1,320.00
6	To underseal	\$ 120.00
		<u>\$ 3,320.00</u>

Grand - total : \$ 18,204.01

# PAL'S

APPRAISER PTE LTD

No. 1 Kaki Bukit Avenue 6 #01-53 AutoBay @ Kaki Bukit Singapore 417883 Tel: 8181 8802 Fax: 6747 1017  
Registration No.: 201000268D

Billing Name & Address  
Lim Lian Pang  
c/o No.1 Kaki Bukit Avenue 6  
#01-53 Autobay  
Singapore 417883

Invoice No 12-20008/AY

Date 1 Feb 2021

Vehicle No : SLM 3328 A

Model : Volkswagen Golf

Item	Descriptions	Amount S\$
1	Date of inspection : <u>28 Dec 2020</u> A copy of the inspection / survey report Correspondence, postages and etc.	
2	Photography Services - Purchase of films, develop negatives - Storage of negatives - Submission of photographs <u>164</u> copies	
3	Transportation Charges	
4	2nd Inspection & Final Inspection	
	Total	<u>\$ 1089.00</u>
	SDLS : ONE THOUSAND AND EIGHTY-NINE ONLY	

Notes :

1. All cheque payment should be "Crossed" and made payable to "Pal's Appraiser Pte. Ltd."
2. All cheque should have our "Invoice No." written on the reverse side of the cheque
3. For further enquiries on this invoice, please feel free to contact us



Official Stamp

E & O. E

# PAL'S

APPRAISER PTE LTD

No. 1 Kaki Bukit Avenue 6 #01-53 AutoBay @ Kaki Bukit Singapore 417883 Tel: 8181 8802 Fax: 6747 1017  
Registration No.: 201000268D

Report Reference : **TP / 12-20008/AY / 2020**

Date of Report : **1 Feb 2021**

Lim Lian Pang  
c/o No.1 Kaki Bukit Avenue 6  
#01-53 Autobay  
Singapore 417883

## **THIRD PARTY SURVEY ACCIDENT HAPPENED ON 24 Dec 2020**

As per your instruction dated **28 Dec 2020** with regard to the above matter. We have carried out a physical inspection on the said vehicle **SLM 3328 A**. We enclosed herewith our report and findings as follows:

### **1. VEHICLE PARTICULARS**

Registration No : SLM 3328 A  
Model : Volkswagen Golf  
Year / Capacity : 2017/1395  
Chassis No : WVGZZZAUZHW109889  
Engine No : CZD257925  
Mileage : 35308  
Colour : White

### **2. TYRES CONDITION**

		<u>Size</u>	<u>Made</u>	<u>Balance</u>		<u>Rim</u>
FRONT	O/S	: 225/35 R19	Pirelli	4.00	mm	Sport
REAR	O/S	: 225/35 R19	Pirelli	4.00	mm	Sport
FRONT	N/S	: 225/35 R19	Pirelli	4.00	mm	Sport
REAR	N/S	: 225/35 R19	Pirelli	4.00	mm	Sport

# PAL'S

APPRAISER PTE LTD

No. 1 Kaki Bukit Avenue 6 #01-53 AutoBay @ Kaki Bukit Singapore 417883 Tel: 8181 8802 Fax: 6747 1017  
Registration No.: 201000268D

### 3. DESCRIPTION OF DAMAGES

At the time of inspection, we noted that the vehicle has sustained an impact damages on the front o/s portion(s). For more detail of the damages, please see photograph attached.

4. Workshop Address : Glatt Auto Kit Pte Ltd  
No.1 Kaki Bukit Avenue 6  
#01-53 Autobay  
Singapore 417883

5. Estimated normal period of repair : **11** working days to complete.

6. Enclosed number of photograph : **164** copies.

7. In accordance to your instruction, we have **Not Authorised** repair to the vehicle and the survey was done on a "**Without Prejudice**" basis. We hope that this report will be of assistance to you in dealing with the matter.

8. Should you discover any discrepancy in the report, please kindly notify us **within 2 weeks**, or the report will be treated as correct.

#### Disclaimer

The rates and assessment of damages as stated in this report is to be used solely for legal proceedings in relation to the surveyed vehicle and the accident in which the surveyed vehicle was involved in. The rates and assessment of damages must not be used in any circumstances for comparison with other vehicles and/or other accidents in other legal proceedings.

Vehicle No: **SLM 3328 A**  
 Report No: **TP/ 12-20008/AY / 2020**

**SPARE PARTS**

Qty	Parts Description	Condition	Workshop's Estimation	Our Revised Estimation
<u>List Items</u>				
1	Front o/s headlamp	Damage	\$ 2330.82	\$ 2330.82
1	Front bumper	Damage	\$ 1443.20	\$ 1443.20
1	Front bumper bracket	Damage	\$ 72.85	\$ 72.85
1	Front bumper side retainer	Damage	\$ 27.90	\$ 27.90
1	Front bumper lower grille	Damage	\$ 191.41	\$ 191.41
1	Front bumper sensor	Intact	\$ 250.00	\$
1	Front bumper o/s fog lamp	Damage	\$ 265.79	\$ 265.79
1	Front bumper o/s fog lamp grille	Damage	\$ 122.55	\$ 122.55
1	Front o/s nozzle spray pen	Damage	\$ 166.92	\$ 166.92
1	O/s side skirt	Damage	\$ 1705.00	\$ 1705.00
1	O/s side skirt retainer	Damage	\$ 101.00	\$ 101.00
1	Front o/s fender	Damage	\$ 667.36	\$ 667.36
1	Front o/s fender inner shield	Damage	\$ 158.76	\$ 158.76
1	Front o/s fender air guide	Damage	\$ 78.68	\$ 78.68
1	Front o/s fender inner garnish	Damage	\$ 63.00	\$ 63.00
1	Front o/s wheel hub c/w bearing	Damage	\$ 517.18	\$ 517.18
1	Front o/s shock absorber	Damage	\$ 310.40	\$ 310.40
1	Front o/s shock absorber mounting	Intact	\$ 131.16	\$
1	Front o/s knuckle arm	Damage	\$ 329.65	\$ 329.65
1	Front o/s lower arm	Damage	\$ 375.31	\$ 375.31
1	Front o/s lower arm ball joint	Damage	\$ 133.72	\$ 133.72
1	Front steering rack	Intact	\$ 2951.00	\$
1	Front steering rack cross member	Damage	\$ 795.00	\$ 795.00
1	Front steering tie rod	Damage	\$ 114.48	\$ 114.48
1	Front steering tie rod end	Damage	\$ 152.22	\$ 152.22
1	Front o/s driveshaft	Damage	\$ 2714.59	\$ 2714.59
			<u>\$ 16169.95</u>	<u>\$ 12837.79</u>
	Discount	10.0%	\$ 1617.00	\$ 1283.78
			<u>\$ 14552.95</u>	<u>\$ 11554.01</u>
<u>Special Nett Items</u>				
1	Front o/s tyre (depreciation)	Damage	\$ 600.00	\$ 240.00
4	Front o/s sport rims (1 set)	Damage	\$ 3000.00	\$ 3000.00
1	Front headlamp sticker	Necessary	\$ 90.00	\$ 90.00
			<u>\$ 3690.00</u>	<u>\$ 3330.00</u>

**Spare Parts Total**      \$ 18242.95      \$ 14884.01

Vehicle No: **SLM 3328 A**  
Report No: **TP/ 12-20008/AY / 2020**

**LABOUR COST**

S/No	Job Descriptions	Workshop's Estimation	Our Revised Estimation
	Spare Parts Total c/f	\$ 18242.95	\$ 14884.01
1	To remove and refit damage parts, test for proper functioning and focus of headlamps.	\$ 50.00	\$ 40.00
2	To remove and refit front undercarriage.	\$ 600.00	\$ 400.00
3	To check and re-adjust (Computerized) all wheel alignment.	\$ 150.00	\$ 120.00
4	To remove and replace the above damaged parts, straighten, knock out, realign and repair including cut and weld body panels. To re-adjust to the original position using power tools.	\$ 1900.00	\$ 1320.00
5	To spray paint on the replaced and repaired parts, prepare spray such as masking tape the unaffected areas with paper, cleaning and sanding of surfaces, final polishing and waxing are also available.	\$ 1700.00	\$ 1320.00
6	To apply undercoating on the repaired and replaced panels for rust protection.	\$ 150.00	\$ 120.00
<b>Total</b>		<u>\$ 22792.95</u>	<u>\$ 18204.01</u>

Recommended PART BY PART Repair Amount of: **\$ 18204.01**

SDLS: EIGHTEEN THOUSAND TWO HUNDRED FOUR  
AND CENTS ONE ONLY

  
\_\_\_\_\_  
Qualified Appraiser



