

# 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.2020.2791.ya(b)  
Your ref : PA7998E

8 March 2021

WITHOUT PREJUDICE

China Taiping Insurance (Singapore)  
Pte. Ltd.  
No. 3 Anson Road,  
#16-00 Springleaf Tower,  
Singapore 079909  
Attn: Motor Claims Department

Certificate of Posting  
Owner of PA7998E  
Yong Bus Service (no enclosure)  
218 Serangoon Avenue 4  
#08-196 Serangoon Green  
Singapore 550218

Certificate of Posting  
Driver of PA7998E  
Tay Poo Kiang Steven (no enclosure)  
Blk 139 Serangoon North Ave 2  
#03-112  
Singapore 550139

Dear Sir/Madam,

**CLAIMANT: EDMUND VEHICLE RENTAL PTE LTD**  
**ACCIDENT INVOLVING YP5507S & PA7998E ON 13 NOVEMBER 2020 ALONG HOUGANG AVENUE 2 AT ABOUT 0850 HOURS**

We act for EDMUND VEHICLE RENTAL PTE LTD, the owner of vehicle no. YP5507S, whose vehicle was damaged as a result of the abovementioned accident by vehicle no. PA7998E and our search reveals that you were the insurer of motor vehicle no. PA7998E 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	\$7,200
2.	Loss of use (PRI 9 days x \$100)	\$900
3.	Survey report fee	\$749
4.	LTA search fee	\$7.49
5.	GIA search / report fee	\$29.00
6.	Incidentals	\$80.00
7.	Costs	<u>\$900.00</u>
		<u>\$9,865.49</u>

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

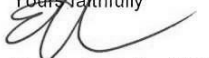
1. GIA report for vehicle no. YP5507S;
2. LTA/GIA search/report fee for PA7998E;
3. Final Repair Bill;
4. Survey report (enclosing original photographs) depicting damage to YP5507S.

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 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 following 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 Report	16/11/2020 18:49
Date Of Accident	13/11/2020 08:50
Exact Location Of Accident	HOUGANG AVENUE 2
Country/State of Loss	SINGAPORE

### DETAILS OF OWN VEHICLE

Vehicle Registration Number	YP5507S
<b>Insured/Policyholder</b>	
Name Of Registered Owner	EDMUND VEHICLE RENTAL PTE LTD
Co Reg No	2XXXXX244G
Email Address	EDMUNDEVIR@GMAIL.COM
Mobile Phone No	
Alternative Phone No	OFFICE-62503339

### Vehicle Particulars

Manufacturer	MITSUBISHI
Model	FUSO
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	5112254195-01
Cover Note Number	

### Driver

Name of Driver	ALAM JAHANGIR
Passport No/FIN	FXXXX909U
Date Of Birth	07/05/1970
Occupation	OUTDOOR
Date Of Driving Pass	22/06/2017
Driving Experience	3 YEARS AND 4 MONTHS
Gender	MALE
Mobile Number	(LOCAL) +65-96372031
Fax Number	
Contact Number	OFFICE-96372031
EMail Address	NOEMAIL

Address	279 BALESTIER ROAD #02-27 BALESTIER POINT SINGAPORE
Postcode	329727
Was driver an employee of the Insured's Company	NO
If No, Relationship of the Driver with the Insured	OTHER - HIRER
Vehicle Registration Number of Driver's Own Vehicle	-
	-
	-
Insurance Company of Driver's Own Vehicle	-
	-
	-

#### General Information of the Accident

Type Of Accident	COLLISION - HEAD TO REAR
Weather Conditions	CLEAR
Road Surface	DRY

#### Other Information

Was any foreign vehicle involved in this accident?	NO
Number of vehicles (including own vehicle) involved in the accident	2
Was any body injured in the Accident?	NO
Was any injured conveyed to hospital by ambulance?	NO
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 TO ATTACHED. VEHICLE B(PA7998E) REVERSED AND HIT FRONT PORTION OF VEHICLE A(YP5507S). PLEASE REFER TO SKETCH, STATEMENT AND VIDEO FOR TYPE OF ACCIDENT.

#### Attachment(s)

Are accident photos available for attachment?	YES
Was there any video captured by Car Camera?	YES
Remarks/ Reasons:	VIDEO FOOTAGE SENT TO NTUC
Was there any audio recorded?	NO

#### DETAILS OF OTHER VEHICLE PROPERTY 1

Vehicle Registration Number	PA7998E
Vehicle Make/Model/Colour	
Details Of Properties	
Vehicle Category	BUS
Name of Driver	
NRIC/Passport Number	
Contact Number	
Address	
Postcode	
Insurance Company Name	
Nature Of Damage	
No. Of Passenger (Including Driver)	

## Sketch Plan


### SKETCH PLAN

#### IMPORTANT NOTICE

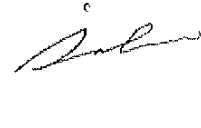
1. Please report correctly the details of the accident to speed up the claims process.
  2. This form must be completed by the Policyholder and/or the Authorised Driver.
  3. Information provided must be as truthful and accurate as possible. Any wilful misrepresentation or withholding of material facts 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 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.
- B. Consent under the Personal Data Protection Act (PDPA)**

I understand, acknowledge, agree and consent that:

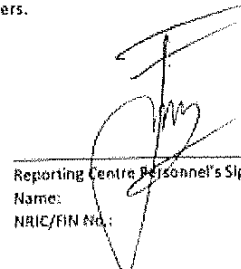
- (a) My insurer, my workshop and the General Insurance Association of Singapore ("GIA") may/are permitted to collect, use, disclose and/or process my personal data/personal information set out in this [form] and any other personal information provided by me or possessed by my insurer (collectively the "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/FIN No.:

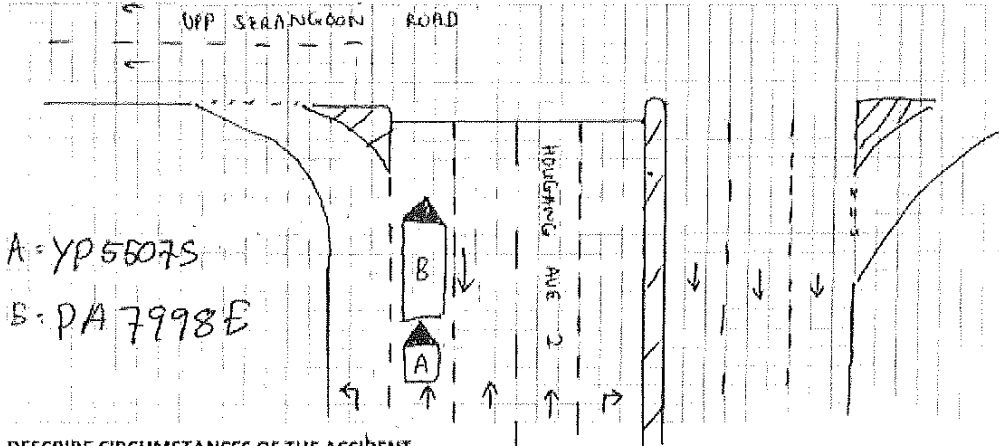


# Sketch Plan #2

Hougang Ave 3



## SKETCH PLAN



## DESCRIBE CIRCUMSTANCES OF THE ACCIDENT

I WAS DRIVING YP5607S TOWARDS HOUGANG  
AVENUE 2, AT THE TRAFFIC LIGHT I PA7998E  
REVERSE AND HIT MY VEHICLE. *[Signature]*

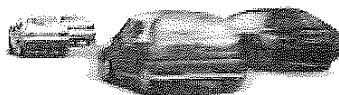
## DECLARATION

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

*[Signature]*  
Policyholder's Signature  
Date & Time:

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

*[Signature]*  
Reporting Centre Personnel's Signature  
Name:  
NMC/FIN No.:



# Thank you

Ang Shi Fun Yvonne has successfully logged out.

Your last login date and time was 03 Dec 2020, 14:49:00.

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	PA7998E	-	18.19 Enquire Veh Owner Info (Others) by Law Firm	7.49	03 Dec 2020 / 14:52:10
2	Vehicle	PA7998E	-	18.19 Enquire Veh Owner Info (Others) by Law Firm	7.49	03 Dec 2020 / 14:52:10



RECORD MANAGEMENT CENTRE

**GENERAL INSURANCE ASSOCIATION OF SINGAPORE**

**RECORDS MANAGEMENT CENTRE**

6 Raffles Quay #18-00, Singapore 048580

Phone: +65 6224 0010 Fax: +65 6224 0030

Operating Hours: Monday to Friday 9am to 5pm

GST Registration No: M400017735

## TAX INVOICE

Date of Request: 14/12/2020

Your Ref No: TA.2020.2791.YA

Dear Sir/Madam,

Date of Accident: 13/11/2020 00:00 (SGT)

Vehicle No: YP5507S

Place of Accident: HOUGANG AVE 2

With reference to your application for the accident report, we have attached the following accident report as requested:

DOCUMENTS	ACCIDENT LOCATION	PER DOC (S\$)	QTY	AMOUNT (S\$)
PA7998E	HOUGANG AVE 2	(29.00 )	1	(27.10 )
GST Amount				(1.90 )
Total Amount Due (GST Inclusive)				(29.00 )

The images provided to you are taken from the original reports forwarded to the centre by the members of the General Insurance Association of Singapore and we take no responsibility for their accuracy or contents and shall be under no liability whatsoever for any loss or damage arising out of or in connection with the reports or their images.

Thank you.

This is a computer generated document and requires no signature.

# M/s Ngee Ngee Motor

Blk K, No. 22 Pandan Loop (West Coast Road, Jurong Town), Singapore 128219

Name : EDMUND VEHICLE RENTAL PTE LTD  
Address : 279 Balestier Road #02-27, Balestier Point Singapore 329727  
Vehicle No. : YP5507S  
Accident date : 13 November 2020

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Final Repair Bill for Vehicle No. YP5507S

To supply labour and replaced parts,  
labour charges for repairing, knocking,  
panel-beating, welding and respray  
(Lumpsum repair)

S\$ 7,200

Singapore Dollars: SEVEN THOUSAND AND TWO HUNDRED ONLY

## CARLINK CONSULTANCY

60 Hillside Drive, Singapore 549009  
Fax: 62874788 Tel: 62856178

## INVOICE

M/S Edmund Vehicle Rental Pte Ltd  
279 Balestier Road, #02-27 Balestier Point  
Singapore 329727

Invoice No: CL 12243 TP  
Our Ref: CL 12243 YP 5507 S  
Date: 23rd February 2021

S/N	DESCRIPTION	QTY	UNIT PRICE (\$)	AMOUNT (\$)
1	<u>Vehicle No: YP 5507 S</u> Charges for accident vehicle inspection and appraisal report, transportation, photographs and misc*** (photographs - 74 copies)			\$749.00
			<b>Total:</b>	<b>\$749.00</b>

We thank you for the opportunity to serve you and assure you of our best at all times

  
PATRICK NG  
Automotive Engineer-Assessor  
MIMI, MIRTE, LCGI, I ENG, LAE, CGLI FTC.

Note: Payment by cheque should be crossed and made payable to "CARLINK CONSULTANCY"

**CARLINK CONSULTANCY**

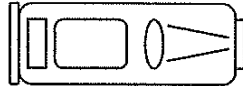
60 Hillside Drive  
Singapore 549009

Tel : 62856178

Fax : 62874788

**ACCIDENT VEHICLE INSPECTION / ASSESSMENT REPORT**

Our Ref: CL 12243 YP 5507 S

<b>1 REFERENCE</b>			
Date of request	:	3rd December 2020	
Requested by	:	M/S Edmund Vehicle Rental Pte Ltd 279 Balestier Road, #02-27 Balestier Point Singapore 329727	
Type of claim	:	Third party	
Workshop	:	M/S Ngee Ngee Motor Blk K, No. 22 Pandan Loop Singapore 128240	
Date of survey	:	3rd December 2020	
Accident date	:	13th November 2020	
<b>2 DETAILS OF VEHICLE</b>			
Registration No.	:	YP 5507 S	
Make & Model	:	Mitsubishi Canter FEB21ER4SDEB (CBU)	
Date of registration	:	12th January 2017	
Engine No.	:	4P10B97593	
Chassis No.	:	FEB21EA20185	
Speedometer reading	:	101343 Km	
Transmission	:	Manual	
Colour	:	White	
<b>3 STATIC CHECK</b>			
Steering	:	see annex(es)	Paintwork : Good
Footbrake	:	see annex(es)	Modification : Nil
Handbrake	:	see annex(es)	General condition : Good
<b>4 TYRE CONDITION</b>			
		<u>Nearside/Make</u>	<u>Offside/Make</u> <u>Size</u>
Front tyre	:	7mm/Yokohama	7mm/Yokohama : 195/85 R15
Rear tyre	:	7mm/Yokohama	7mm/Yokohama : 195/85 R15
<b>5 POINT OF IMPACT</b>			
See Annex(es) and Motor Accident Reports			
<b>6 REMARK</b>			
This inspection was conducted entirely on a "WITHOUT PREJUDICE" basis and we have not authorised any repair.			

## Annex A : Assesement / Adjustment on Spare Parts

YP 5507 S

Item	Vehicle Parts Description	Condition	Qty	W/shop Est. (\$)	Disc (%)	Adjusted Cost (\$)
<b>List Items</b>						
1	Front bumper	Repair	1	\$895.00	100%	\$0.00
2	Front bumper side cover LH	Necessary	1	\$334.00	25%	\$250.50
3	Front bumper side cover RH	Necessary	1	\$334.00	25%	\$250.50
4	Front bumper bracket L/R	Repair	1	\$36.40	100%	\$0.00
5	Head lamp RH	Grazed/shifted/cracked	1	\$10.00	25%	\$7.50
6	Head lamp LH	Grazed/shifted/cracked	1	\$610.00	25%	\$457.50
7	Side lamp garnish RH	Cracked	1	\$218.80	25%	\$164.10
8	Side lamp garnish LH	Cracked	1	\$218.80	25%	\$164.10
9	Signal lamp RH	Grazed/shifted/cracked	1	\$325.65	25%	\$244.24
10	Signal lamp LH	Grazed/shifted/cracked	1	\$325.65	25%	\$244.24
11	Front panel	Buckled	1	\$3,046.00	25%	\$2,284.50
12	Front panel FUSO emblem	Necessary	1	\$152.00	25%	\$114.00
13	Front grille badge	Necessary	1	\$57.00	25%	\$42.75
14	Front grille assy	Distorted/cracked	1	\$959.50	25%	\$719.63
15	Front corner panel RH	Cracked	1	\$383.15	25%	\$287.36
16	Front corner panel clips RH	Necessary	2	\$12.00	25%	\$9.00
17	Front corner panel LH	Cracked	1	\$383.15	25%	\$287.36
18	Front corner panel clips LH	Necessary	2	\$12.00	25%	\$9.00
19	Front LH mirror stay	Bent	1	\$415.00	25%	\$311.25
20	Front LH mirror (round)	Distorted/cracked	1	\$125.00	25%	\$93.75
<b>Total for Spare Parts :</b>				<b>\$8,853.10</b>		<b>\$5,941.28</b>

## Annex B : Adjustment on Labour and Spray Painting

YP 5507 S

Item	Job Description	Workshop Est. (\$)	Adjusted Cost (\$)
1	Anti rust treatment	\$150.00	\$120.00
2	To check wiring system & lights	\$100.00	\$80.00
3	To respray affected areas	\$1,200.00	\$950.00
4	To renew damaged parts, straighten/repair front bumper & bracket & aligned all parts	\$1,800.00	\$1,400.00
<b>TOTAL FOR LABOUR &amp; SPRAY PAINTING :</b>		<b>\$3,250.00</b>	<b>\$2,550.00</b>

### Summary

	Workshop Est. (\$)	Adjusted Cost (\$)
TOTAL FOR SPARE PARTS :	\$8,853.10	\$5,941.28
TOTAL FOR LABOUR & SPRAY PAINTING :	\$3,250.00	\$2,550.00
<b>TOTAL REPAIR COSTS :</b>	<b>\$12,103.10</b>	<b>\$8,491.28</b>



## CARLINK CONSULTANCY

YP 5507 S

### Annex C: Recommendation

We have inspected thoroughly the actual damages found on the vehicle and our assessment is appended in the Annex(es) attached. The condition and age of the vehicle was considered before we reached our recommendation as to whether the parts need replacement or repair.

M/S Ngee Ngee Motor estimated repair cost is **S\$12,103.10** and we have adjusted it to **S\$8,491.28** on a part by part basis. However, taking into consideration the age of the vehicle and the availability of used/recondition components. We, therefore recommend a contract lump sum repair cost.

The repairer have agreed to undertake the repairs on a contract lump sum of **S\$7,200.00**, according to acceptable quality and standard. (Repairer discretion to repair parts, to replace with old parts, or to replace with OEM or genuine parts).

The entire repair of the damaged vehicle should be completed within a reasonable period of **7** working days.

We have advised the repairer that the inspection was conducted strictly on a WITHOUT PREJUDICE basis and we have not given any instruction and authorisation to proceed with the repair of the vehicle.

We are reverting the matter to you for your discretion and enclosed is our invoice for service rendered.

Yours faithfully,

CARLINK CONSULTANCY



PATRICK NG

Automotive Engineer Assessor

MIMI, MIRTE, LCGI, I ENG, LAE, CGLI FTC.



**TRUCK & BUS CORPORATION**

**FEB21E**

**FEB21EA20185A**

**5000**

**2300**

**3800**

MODEL CHASSIS NO. MAX G.V.W. MAX AXLE LOADS FRONT REAR

RLINK CONSULTANCY

CARTLINK CO





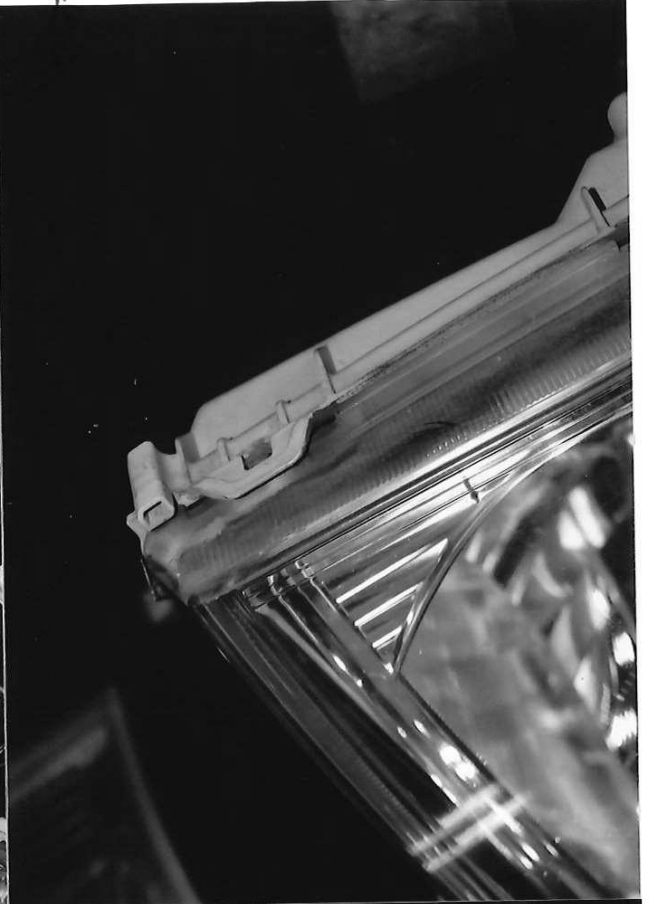








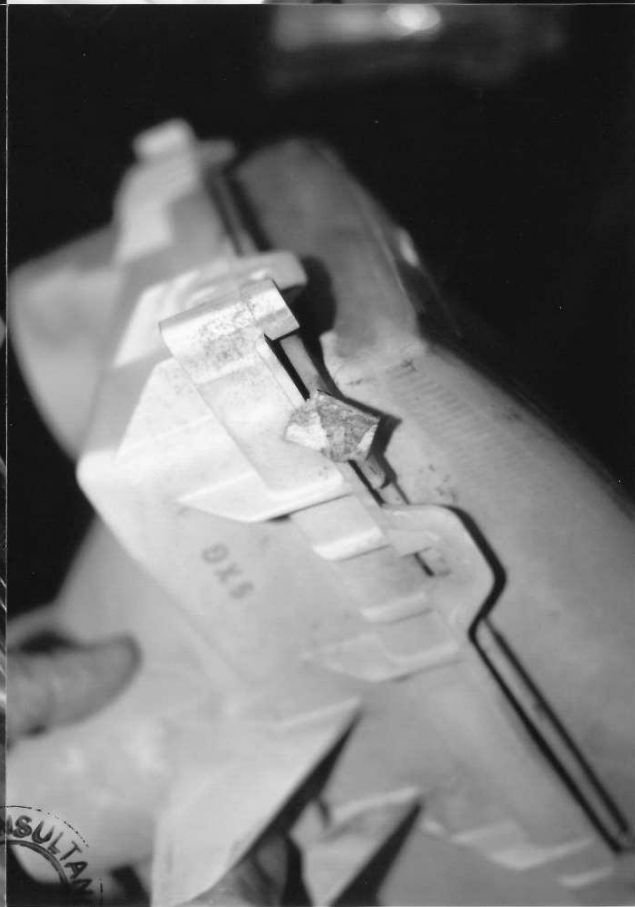
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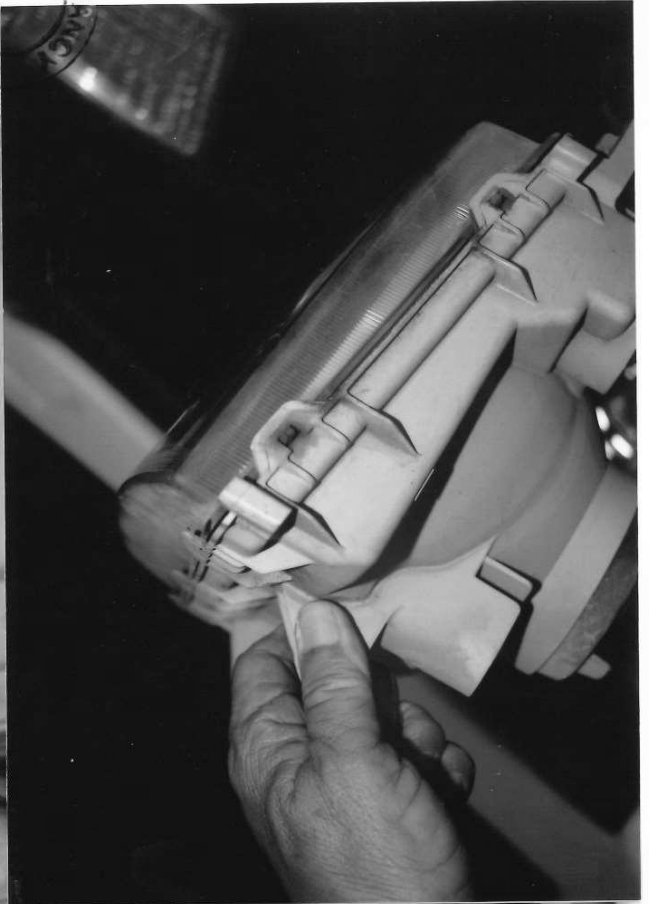
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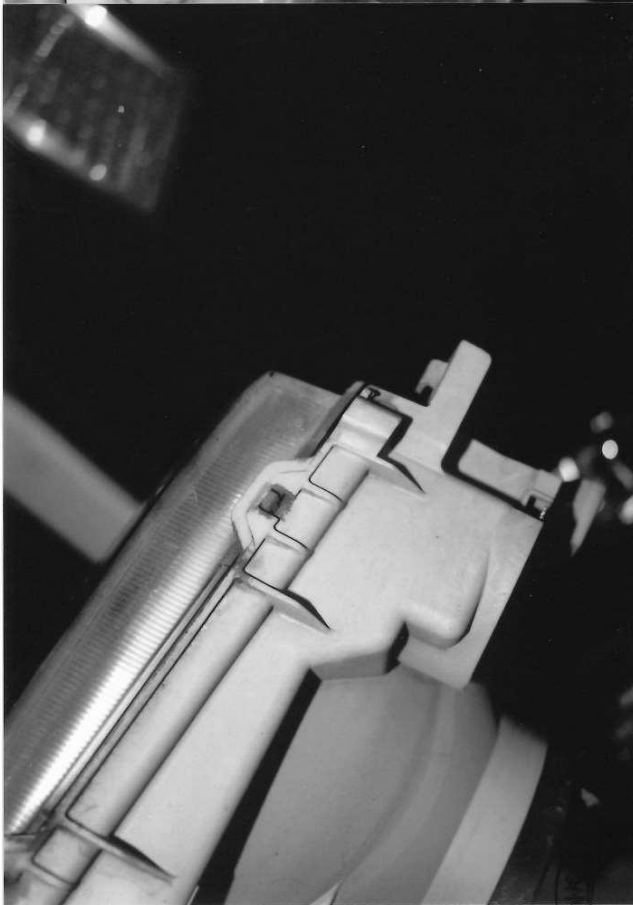
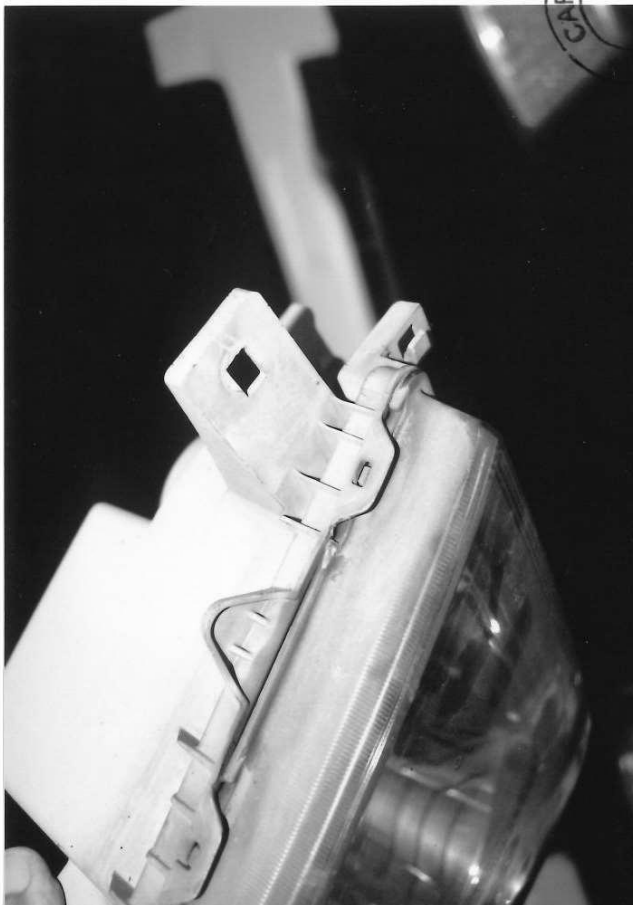
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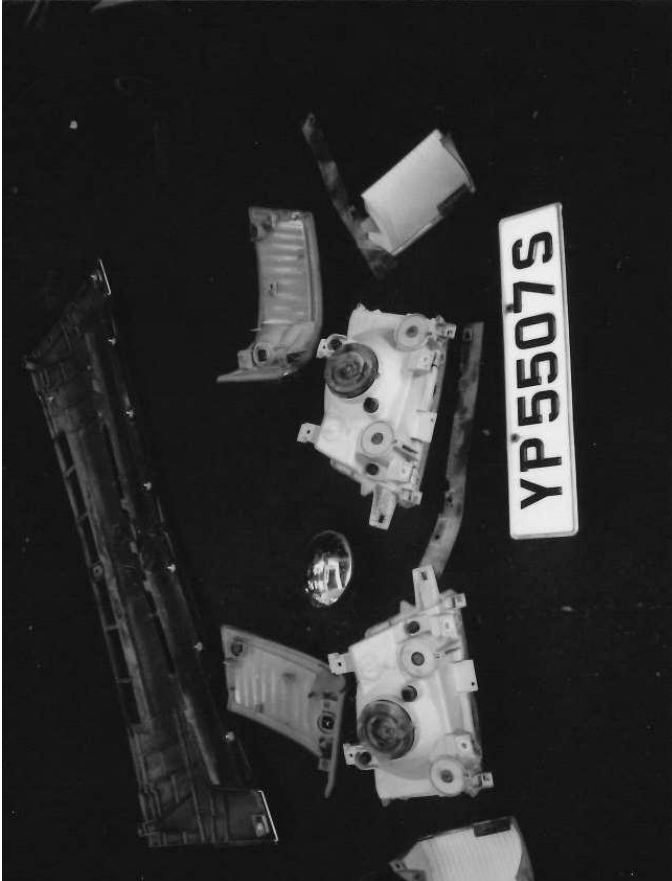


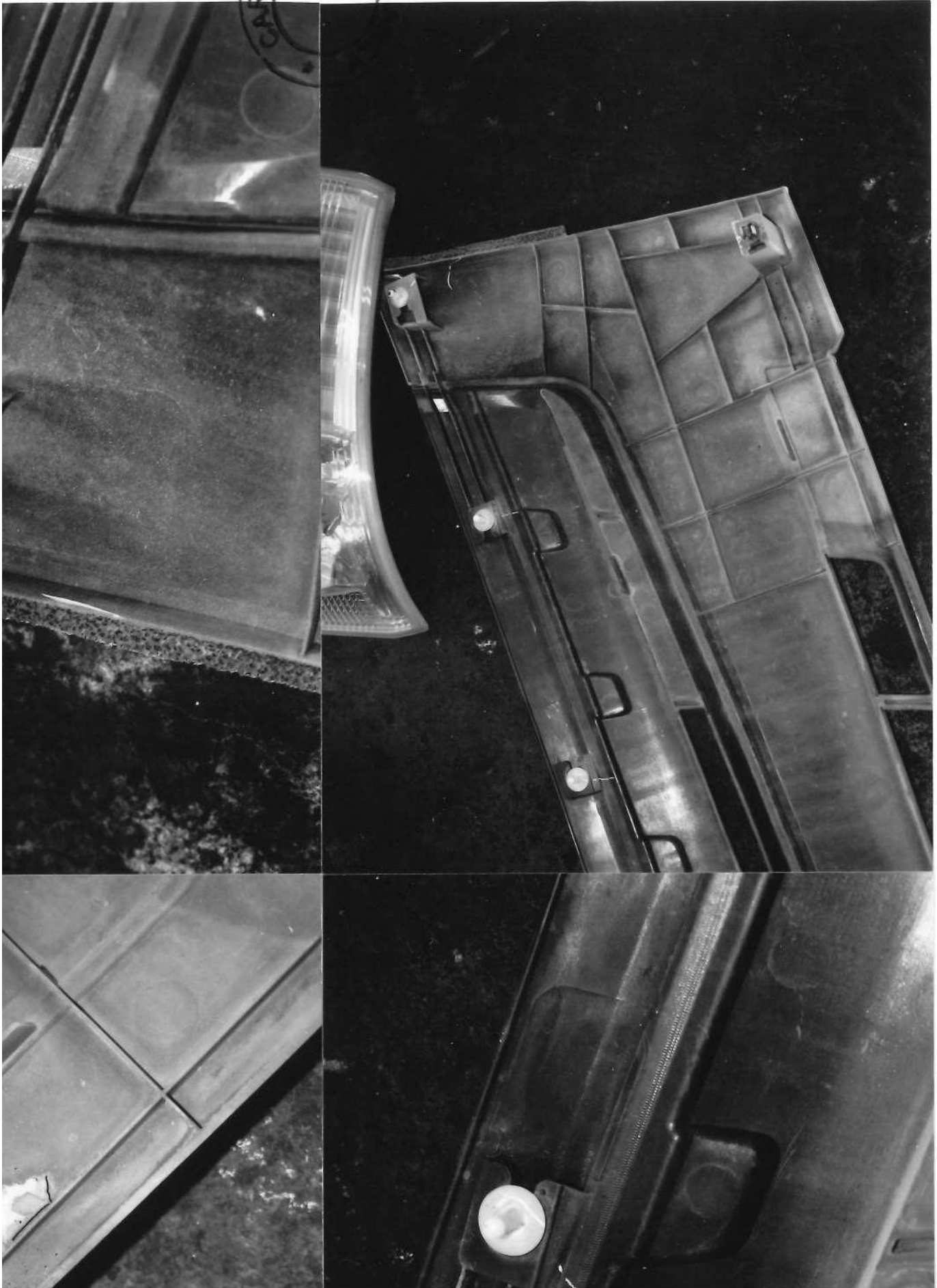
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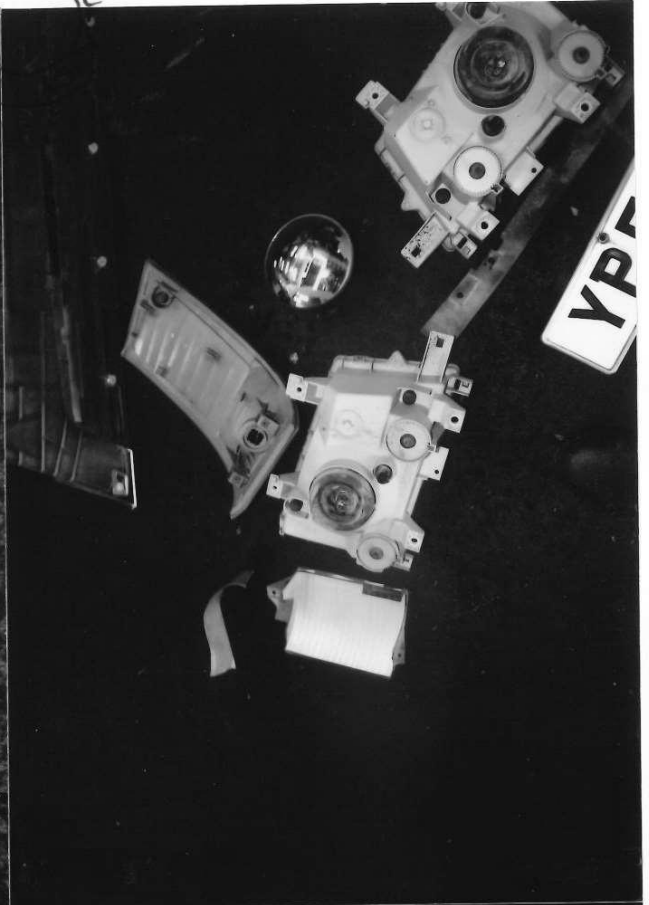


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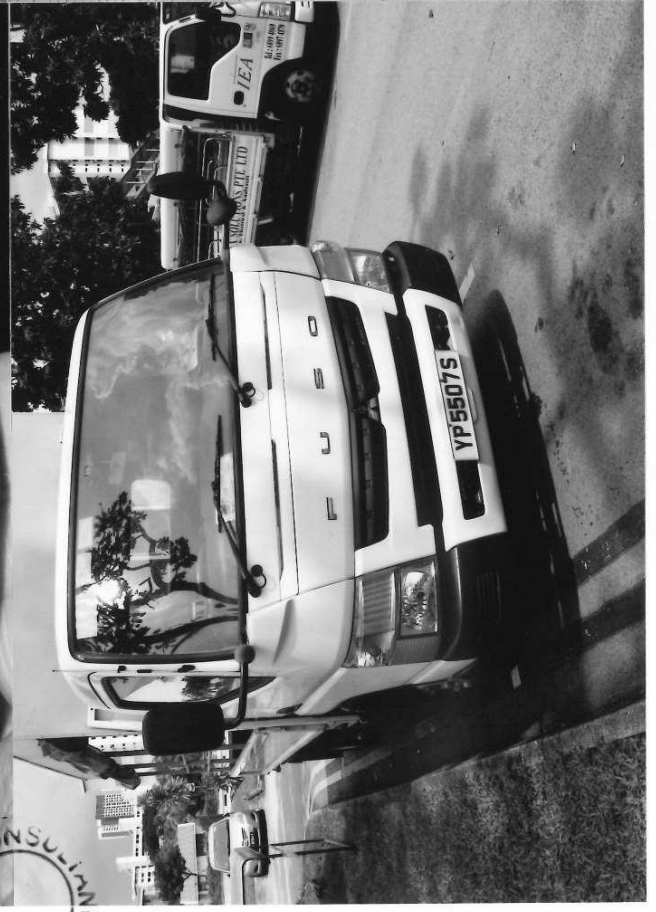
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