

**IN THE HIGH COURT OF THE REPUBLIC OF SINGAPORE**

HC/S 589/2020

Between

**DANNY RAJ A/L MUNIAPPAN**

(Malaysia Identity Card No. 921030-07-5297)

.. Plaintiff

And

**ANG ZHIQIANG**

(NRIC No. S8331354D)

... Defendant

**REPLY**

1. Save as set out in the Statement of Claim and hereinafter provided the Plaintiff joins issue with the Defendant in the matters set out in the Defence filed on 14<sup>th</sup> August 2020.
2. As regards to paragraph 3 of the Defence, the Plaintiff puts the Defendant to strict proof that the Defendant's vehicle ["car"] suddenly stalled on the extreme right lane of the highway.
3. Subject to discovery and/or interrogatories, the Plaintiff will assert that the Defendant allowed the car to travel along and remain on the extreme right lane when he knew or ought to have known that the car will pose a threat to other road users by impeding their path of travel.
4. Further and in the alternative, and subject to discovery and or interrogatories, the Plaintiff will allege that the car did not suddenly stall but there were sufficient signs and symptoms for the Defendant to apprehend that the car is likely to malfunction and for which a reasonable and competent driver would take steps to divert the car to the breakdown lane along the highway.
5. Save as is hereinbefore expressly admitted the Plaintiff denies each and every allegation contained in the Defence as if the same were set forth herein seriatim and specifically traversed.

Dated 26<sup>th</sup> day of august 2020

*Central*  
**SOLICITORS FOR THE PLAINTIFF**  
**CENTRAL CHAMBERS LAW CORPORATION**  
**RKC/200200/uk/DaveAnan(DannyRaj)**

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