

17 MAR 2021

Def: Chandra Kumaran Rao A/L Krishnan Moorthy: 1<sup>st</sup>:

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

HC/S 589/2020

Between

DANNY RAJ A/L MUNIAPPAN  
(Malaysia Malaysian ID 921030075297)

...Plaintiff(s)

And

ANG ZHIQIANG  
(NRIC No. S8331354D)

...Defendant(s)

**AFFIDAVIT OF EVIDENCE-IN-CHIEF**  
**OF CHANDRA KUMARAN RAO**  
**A/L KRISHNAN MOORTHY**

I, CHANDRA KUMARAN RAO A/L KRISHNAN MOORTHY (FIN No. G6523417W) of Blk 612 Ang Mo Kio Avenue 4 #07-1133 Singapore 560612 do solemnly and sincerely make ~~oath~~ / affirm and say as follows:-

1. In so far as the facts are within my personal knowledge, they are true. In so far as the facts are not within my personal knowledge, they are true to the best of my information and belief.
2. I am currently working as a technician with All-Best Photocopy & Printing having joined the company in 2018. Before that I was working with SATS Singapore.

3. On the day in question (24 July 2017), I had just finished my night shift at SATS Singapore and was making my way home to Johor Bahru, Malaysia. I was riding along the TPE and entered into the SLE, travelling on the 3<sup>rd</sup> lane along SLE.
4. Just before the Lentor exit, the Plaintiff's motorbike sped past me on the right from behind and overtook me at a high speed. Ahead of me I observed the Plaintiff changing lanes quickly as he moved from the 3<sup>rd</sup> to the 2<sup>nd</sup> to the 1<sup>st</sup> lane.
5. I observed that the Plaintiff then overtake a vehicle on the 1<sup>st</sup> lane and, to my shock and horror, I saw someone being flung forward. I did not see the collision.
6. When I arrived at the scene, I saw that the person who was flung forward had landed before a white car. I approached him and he asked me what had happened. I told him "you just had an accident, don't move".
7. I then approached the white car and saw that the Plaintiff was lying at the rear of the car.
8. When I was standing near the white car, the Defendant asked me if I saw the accident. I realised that he was the driver of the white car and told him I did not see the collision, but saw the Plaintiff's motorbike overtaking me at a

high speed about 200-300m from where the accident took place. I saw him change lane and then saw someone being flung forward.

9. I wish to highlight that the Plaintiff's motorbike was going at such a high speed he had already gone 200-300m ahead despite only just overtaking me.
10. The Defendant then asked if I would be a witness for him. I agreed and gave him my number.
11. A few days later, I received a call from the Traffic Police who asked me if I had seen the accident. I told the Traffic Police the same thing I stated above, i.e. that I did not see the collision but saw the Plaintiff overtake me from the right and travel from 3<sup>rd</sup> lane to the 1<sup>st</sup> lane, overtaking a car before I saw a person being flung forward shortly thereafter.
12. The Traffic Police did not require me to come to the police station to give a statement.

**SWORN / AFFIRMED** by the abovenamed )  
**CHANDRA KUMARAN RAO A/L** )  
**KRISHNAN MOORTHY** )  
 On the 30<sup>th</sup> day of NOV 2020 )  
 At Singapore )  
 through the interpretation of **SUSILA GANESAN** )  
 in Tamil )




Before me,  


**A COMMISSIONER FOR OATHS**

M/s ComLaw LLC - Ref: DV.2020.221290.axa