

17 MAR 2021

Def: Khoo Heng Lai: 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 KHOO HENG LAI**

I, KHOO HENG LAI (NRIC No. S1297320I) of 32 Lorong Tanggam  
Singapore 798732, 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 62 years old and have been a home maker for the past 30 years. I am the owner of motorcar SFJ 1223T ("the Vehicle"). The Vehicle is a white Audi S4 saloon car and was purchased brand new from Premium Auto in June 2010.

3. I reside in my family home together with my family including the Defendant (“my son”), and my son is an authorised driver.
4. For the first few years as the car was under warranty I would send the car to Audi Service Centre for routine servicing and maintenance.
5. After the warranty period, I serviced my vehicle at the expiry of the standard maintenance mileage intervals at various workshops. Since 2015, I have been sending my vehicle for its regular servicing maintenance and repair at NGS Trading. My son handles the maintenance of the car for me.
6. I go to various places for my LTA inspection but I usually go to STA at Xinmin for the yearly LTA inspection. The last LTA inspection was about one month before the accident. Annexed hereto at **KHL-1** are my service records from 2015 up to the time of the accident and the latest LTA certification of road worthiness dated 23 June 2017.
7. I am the main user of my vehicle. Apart from me, my son and my husband would also use it on occasions.
8. On 24 July 2017 at about 1045 a.m., my son was driving the Vehicle on the SLE towards the BKE. I was seated beside him as the front-seat passenger.

9. While he was driving in the extreme right lane, the Vehicle suddenly started to lose speed. I got a shock and wondered what was happening. The Vehicle then suddenly came to a stop. I noticed my son turning on the hazard lights and pressing the button to release the boot. I saw that he opened his door to alight, but before he could do so there was a loud crash from the back. I froze in shock and seconds later I saw someone flying ahead and landing on the road in front of us.
10. I was terrified and in a state of complete shock. I then alighted from the Vehicle and realised that a motorbike had crashed into the rear of the Vehicle. I wish to highlight that the Vehicle had just lost power and stalled when the motorbike crashed into it. This was the first time that the Vehicle had lost power and stalled while being driven.
11. I noticed that traffic from the other lanes slowed down. The police and ambulance came shortly thereafter.
12. My son asked me to wait in the car, and I did so.
13. When the tow truck arrived I was asked to board and sit in the tow truck. After a while my son joined me in the tow truck and we were driven to Tagore Avenue nearby for us to retrieve our belongings before the car was towed to another location. I understand it was taken to the Traffic Police. My son and I then returned home.

14. Subsequent to the event, my son handled everything pertaining to the accident. My insurers made a market value offer for the car. I accepted it and the car was scrapped.

**SWORN / AFFIRMED** by the abovenamed  
**KHOO HENG LAI**

On the 1<sup>st</sup> day of Dec 2020

At Singapore

through the interpretation of Tay Siew Gek  
 in Chinese Linda

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 )  
 )  
 )

Before me,

**A COMMISSIONER FOR OATHS**

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



THIS IS THE EXHIBIT MARKED "**KHL-1**".

REFERRED TO IN THE AFFIDAVIT OF

**KHOO HENG LAI**

AND SWORN / AFFIRMED BEFORE ME

THIS <sup>1<sup>st</sup></sup> DAY OF <sup>Dec</sup> 2020

BEFORE ME

A COMMISSIONER FOR OATHS



**TEST CERTIFICATE**NO **STAD0257265**Land Transport  AuthorityTHE ROAD TRAFFIC ACT  
(CHAPTER 276)

This is to certify that motor vehicle with registration No. **SFJ1223T** was examined under section 90 of the Road Traffic Act and that at the date of the examination the prescribed statutory requirements were complied with in relation to the vehicle.

Date of issue **23/06/2017**

STA Inspection Pte Ltd

Reference No **LD170623080****KEEP THIS CERTIFICATE SAFELY**

CHECK carefully that the particulars specified above are correct. A test certificate showing any alteration should not be issued or accepted as this may delay the renewal of a vehicle licence.

For the purpose of renewing road tax, this Certificate must be presented within 3 months from the date of issue.

**WARNING:**

A test certificate should not be accepted as evidence of the satisfactory mechanical condition of a vehicle offered for sale.

**STA Inspection Pte Ltd**

Sing Sing Centre  
303 The Arcade Road  
Singapore 439627  
Tel: 6733 4492 / 4392  
Fax: 655 9455 / 4394  
www.sta.sg  
100 Beach Road, #10-01/02/03  
Singapore 189701

**John Boon Lay Centre**

141 John Road, #01-01  
Singapore 109429  
Tel: 655 8281 / 8180  
Fax: 655 8181 / 8181

TAXI: 01 079 8 001 03 00 00

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

## CASH SALES

JAMES ANG - SFJ1223T

**No. : CS201511-19**

Veh No : SFJ1223T AUDI S4

Mileage : 142743 KM

Date : 12/11/2015

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
ACCIDENT REPAIR JOB:-	4,200.00
<i>Items Description</i>	<i>Quantity</i>
FRT BUMPER 'GENUINE'	1
RADIATOR GRILLE 'GENUINE'	1
HEADLAMP INNER BRACKET LH 'GENUINE'	1
HEADLAMP LOWER BRACKET LH OUTER 'GENUINE'	1
SPRAY PAINTING	1
PANEL BEATING	1
PACKAGE SERVICE:-	225.00
<i>Items Description</i>	<i>Quantity</i>
OIL FILTER AUDI 'GENUINE'	1
ENG OIL " EGDE" 5W/40	1
SERVICE CHARGES	1
SUPPLY & RENEW AUTO TRANSMISSION OIL 'GENUINE' 5 LTS	280.00
NO PLATE	60.00

SINGAPORE DOLLAR FOUR THOUSAND SEVEN HUNDRED SIXTY FIVE ONLY

**Net Total** **4,765.00**

Notes :

1. All cheques should be crossed and made payable to  
NGS TRADING
2. Goods sold are neither returnable nor refundable.

\_\_\_\_\_  
**Authorised Signature**

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201601-01

Veh No : SFJ1223T

Mileage :

Date : 02/01/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
UPPER & LOWER ARM BUSH 'GENUINE' RH/LH - 10 PCS	400.00
PRESS BUSHES	80.00
LABOUR TO REMOVE & REPLACE UPPER	200.00

SINGAPORE DOLLAR SIX HUNDRED EIGHTY ONLY

Net Total **680.00**

Notes :

1. All cheques should be crossed and made payable to  
NGS TRADING
2. Goods sold are neither returnable nor refundable.

\_\_\_\_\_  
 Authorised Signature



# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201605-21

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 13/05/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
PACKAGE SERVICE:-	260.00
<i>Items Description</i>	<i>Quantity</i>
OIL FILTER 'GENUINE' AUDI S4	1
ENG OIL "EGDE" 5W/40	2
LABOUR CHARGE	1

SINGAPORE DOLLAR TWO HUNDRED SIXTY ONLY

Net Total **260.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**

2. Goods sold are neither returnable nor refundable.

\_\_\_\_\_  
 Authorised Signature

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.:51106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201605-41

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 19/05/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
WATER PUMP JOB PACKAGE:-	810.00
<i>Items Description</i>	<i>Quantity</i>
WATER PUMP AUDI S4 'GENUINE'	1
THERMOSTAT AUDI S4 'GENUINE'	1
COOLANT AUDI S4 'GENUINE'	1
LABOUR TO REMOVE FRT ATTACHMENT BUMPER, HEADLAMP TO ENABLE TO RENEW WATERPUMP, HOSE & PIPING	1
HOSE BY PASS AUDI S4 'GENUINE'	15.00
PLASTIC HOSE AUDI S4 'GENUINE'	75.00
4 IN 1 PIPE AUDI S4 'GENUINE'	95.00

SINGAPORE DOLLAR NINE HUNDRED NINETY FIVE ONLY

Net Total **995.00**

Notes :

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NGS TRADING
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Authorised Signature

**NGS TRADING**

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

**CASH SALES**

JAMES ANG - SFJ1223T

**No. : CS201606-09**

Veh No : SFJ1223T AUDI S4

Mileage :

Date : 03/06/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
OIL SEPERATOR 'GENUINE' AUDI S4	220.00
HOSE	35.00
HOSE, TUBE	20.00
INTAKE MANIFOLD TOP & BOT GASKET SEAL 'GENUINE' - 12 PCS	132.00
FAN BELT 'GENUINE' 2 PCS	107.00
LABOUR TO RECTIFY WATER LEAKAGE AND RENEW INTAKE MANIFOLD GASKET & FAN BELT	120.00

SINGAPORE DOLLAR SIX HUNDRED THIRTY FOUR ONLY

**Net Total** **634.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**
2. Goods sold are neither returnable nor refundable.

**Authorised Signature**

**NGS TRADING**

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: S1106300L

**CASH SALES**

JAMES ANG - SFJ1223T

**No. : CS201607-37**

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 15/07/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
TOW - KING TROLLEY	120.00
AUTO FILTER	4,500.00
MEGATRONIC	
AUTO FILTER	
GASKET SET	
AUTO TRANSMISSION FLUID	
LABOUR TO RENEW ABOVE PARTS	
PROGRAMMING	

SINGAPORE DOLLAR FOUR THOUSAND SIX HUNDRED TWENTY ONLY

**Net Total** **4,620.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**

2. Goods sold are neither returnable nor refundable.

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**Authorised Signature**

**NGS TRADING**

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
Reg No.: S1106300L

**CASH SALES**

JAMES ANG - SFJ1223T

**No. : CS201608-17**

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 06/08/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
SUPPLY & REPLACE REAR BOOT LOCK & DAMPER	240.00

SINGAPORE DOLLAR TWO HUNDRED FORTY ONLY

**Net Total** **240.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**

2. Goods sold are neither returnable nor refundable.

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**Authorised Signature**

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: S1106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201609-20

Veh No : SFJ1223T S4 3.0 8V

Mileage : 161872 KM

Date : 11/09/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
PACKAGE SERVICE:-	260.00
<i>Items Description</i>	<i>Quantity</i>
OIL FILTER AUDI 'GENUINE' S4	1
ENG OIL "EGDE" 5W/40	2
SERVICE CHARGES	1

SINGAPORE DOLLAR TWO HUNDRED SIXTY ONLY

Net Total **260.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**
2. Goods sold are neither returnable nor refundable.

\_\_\_\_\_  
 Authorised Signature

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201612-09

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 05/12/2016

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
LABOUR TO REPLACE FRT & REAR BRAKE PAD, FRT DISC ROTOR AND RESETTING BRAKE	500.00
<i>Items Description</i>	<i>Quantity</i>
FRT BRAKE PAD & SENSOR 'GENUINE' AUDI S4	1
RR BRAKE PAD 'GENUINE' AUDI S4	1
LABOUR TO RENEW FRT & REAR BRAKE PAD	1
SUPPLY & REPLACE INTAKE MANIFOLD LH 'GENUINE ' & RESETTING	980.00

SINGAPORE DOLLAR ONE THOUSAND FOUR HUNDRED EIGHTY ONLY

Net Total **1,480.00**

Notes :

1. All cheques should be crossed and made payable to  
NGS TRADING
2. Goods sold are neither returnable nor refundable.

Authorised Signature

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201701-12

Veh No : SFJ1223T AUDI S4

Mileage : 172810 KM

Date : 10/01/2017

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
AIR VALVE LH 'GENUINE' AUDI S4	110.00
COMBI VALVE LH 'GENUINE' AUDI S4	290.00
COMBI VALVE GASKET 'GENUINE' AUDI S4	10.00
POWER STEERING FLUID 'GENUINE' AUDI S4	25.00
LABOUR TO RENEW COMBI VALVE, AIR VALVE, RECTIFY POWER STG OIL LEAKING RENEW ALL O RING 9 PCS	280.00
PACKAGE SERVICE	260.00
<i>Items Description</i>	<i>Quantity</i>
OIL FILTER AUDI 'GENUINE' S4	1
ENG OIL "EGDE" 5W/40	2
SERVICE CHARGES	1

SINGAPORE DOLLAR NINE HUNDRED SEVENTY FIVE ONLY

Net Total **975.00**

Notes :

1. All cheques should be crossed and made payable to  
NGS TRADING
2. Goods sold are neither returnable nor refundable.

\_\_\_\_\_  
 Authorised Signature



**NGS TRADING**

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
Reg No.:51106300L

**CASH SALES**

JAMES ANG - SFJ1223T

**No. : CS201703-62**

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 29/03/2017

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
SUPPLY & REPLACE SPARK PLUG 6PCS AUDI S4 'GENUINE'	150.00
LABOUR	60.00

SINGAPORE DOLLAR TWO HUNDRED TEN ONLY

**Net Total** **210.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**

2. Goods sold are neither returnable nor refundable.

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**Authorised Signature**

# NGS TRADING

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No. 51106300L

## CASH SALES

JAMES ANG - SFJ1223T

No. : CS201706-47

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 21/06/2017

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
FRT & REAR WHEEL BEARING 4PCS AUDI S4 '	700.00
FRT BRAKE PAD 'GENUINE AUDI S4	185.00
FRT CALIPER PISTON R/KIT SET 'GENUINE' AUDI S4	150.00
PRESS & PUMP BEARING	80.00
LABOUR TO RENEW FRT BRAKE PAD, FRT & REAR WHEEL BRG, REPAIR BRAKE CALIPER	280.00
SUPPLY & REPLACE RADIATOR:-	1,160.00
<i>Items Description</i>	<i>Quantity</i>
RADIATOR AUDI S4 'GENUINE'	1
RAD PIN AUDI S4 'GENUINE'	1
WATER PLUG AUDI S4 'GENUINE'	2
COOLANT, 'GENUINE'	1
WATER PUMP AUDI S4 'GENUINE'	1
LABOUR TO RENEW RADIATOR & WATER PUMP	1

SINGAPORE DOLLAR TWO THOUSAND FIVE HUNDRED FIFTY FIVE ONLY

Net Total **2,555.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**

2. Goods sold are neither returnable nor refundable.

\_\_\_\_\_  
 Authorised Signature

**NGS TRADING**

Blk 10 Ang Mo Kio Ind. Pk 2a #02-01 AMK AutoPoint Singapore 568047  
 Tel: 64815727 Fax: 64815772 Email: ngstrading94@gmail.com  
 Reg No.: 51106300L

**CASH SALES**

JAMES ANG - SFJ1223T

**No. : CS201709-40**

Veh No : SFJ1223T S4 3.0 8V WA

Mileage :

Date : 27/09/2017

TEL : 9721 5614

FAX :

Page : 1 of 1

Description	Amount S\$
245/40ZR18 TYRE 2PCS CHANGE ON SFJ1223T	680.00

SINGAPORE DOLLAR SIX HUNDRED EIGHTY ONLY

**Net Total** **680.00**

Notes :

1. All cheques should be crossed and made payable to  
**NGS TRADING**
2. Goods sold are neither returnable nor refundable.

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**Authorised Signature**