

17 MAR 2021

Def: Neo Gim Seong: 1st:

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 NEO GIM SEONG

I, Neo Gim Seong (NRIC No. S1718536E) care of NGS Trading, Blk 10
Ang Mo Kio Industrial Park 2A #02-01 AMK AutoPoint Singapore 568047, 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. The documents I intend to refer to in this Affidavit are annexed hereto and marked as “NGS-1”.
2. I am working as a mechanic and am the sole proprietor of NGS Trading, a car repair workshop situated at AMK Industrial Park. A copy of the

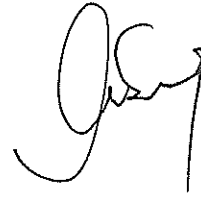
Questnet search of NGS Trading is annexed hereto at pages 5 to 7. I have been in the trade of repairing cars for over 30 years.

3. I started repairing the motorcar SFJ 1223T (“the Vehicle”) in or around November 2015 when the Defendant first sent the Vehicle to my workshop for repairs, and then I subsequently continued servicing the car over the years. Annexed hereto at pages 8 to 19 are my service records from 2015 up to the time of the accident on 24 July 2017.
4. The last invoice dated 27 September 2017 at page 20 is for change of tyres for the Vehicle that was carried out on or about 15 June 2017. The work was invoiced to the Defendant on 27 September 2017 as my tyre supplier Stamford Tyres had only invoiced me for the tyres on 21 September 2017. Annexed hereto at pages 21 and 22 are the said invoice as well as delivery order from Stamford Tyres.
5. I was informed by the Defendant sometime after the accident that on 24 July 2017 that the Vehicle had suddenly lost power and stalled while being driven on the highway. There was thereafter an accident where the Plaintiffs had collided into the Vehicle.
6. The servicing maintenance and repair of the Vehicle over the years did not show any reason for which the Vehicle would have stalled. I do not know what caused the Vehicle to stall.

7. I did not service the Vehicle after the accident. I understand from the Defendant that the Vehicle had been compounded by the traffic police and thereafter sent to another workshop, before the Vehicle was scrapped.

SWORN / AFFIRMED by the abovenamed
NEO GIM SEONG
 On the 30th 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 “**NGS-1**”

REFERRED TO IN THE **AFFIDAVIT** OF

NEO GIM SEONG

AND ~~SWORN~~ / AFFIRMED BEFORE ME

THIS 30th DAY OF Dec 2020

BEFORE ME

A COMMISSIONER FOR OATHS



ENHANCED INSTANT SEARCH



REQUEST CRITERIA

(You have requested to search on the following)

Date of Request :	30/12/2020
Name of Requestor :	ETHOZ CAPITAL LTD
Requested Entity Name :	NGS TRADING
Requested Entity Number :	51106300L
File Reference Number :	

SEARCH RECORD

Entity Name :	1) NGS TRADING
Entity Number :	51106300L

ACCOUNTING AND CORPORATE REGULATORY AUTHORITY
BUSINESS PROFILE (COMPANY)



WHILST EVERY ENDEAVOUR IS MADE TO ENSURE THAT THE INFORMATION PROVIDED IS UPDATED & CORRECT, THE AUTHORITY DISCLAIMS ANY LIABILITY FOR ANY DAMAGE OR LOSS THAT MAY BE CAUSED AS A RESULT OF ANY ERROR OR OMISSION.

DETAILS OF BUSINESS

Entity Name:	NGS TRADING
Entity Number:	51106300L
Date Of Registration (dd/mm/yyyy):	19/07/1994
Commencement Date:	15/07/1994
Certificate Renewal Date:	16/06/2020
Expiry Date:	19/07/2021
Renewal via Giro:	YES
Date Of Change Of Name:	-
Former Name:	-
Type:	SOLE-PROPRIETOR
Status:	LIVE
Status Date:	19/07/1994
Principal Place Of Business:	10 ANG MO KIO INDUSTRIAL PARK 2A #02-01 AMK AUTOPOINT SINGAPORE 568047
Date Of Change Of Address:	28/07/2015
Principal Activity / Activities:	1)REPAIR AND MAINTENANCE OF MOTOR VEHICLES (INCLUDING INSTALLATION OF PARTS & ACCESSORIES) (95301) 2)RETAIL SALE OF MOTOR VEHICLES EXCEPT MOTORCYCLES AND SCOOTERS (47311)

PARTICULARS OF AUTHORISED REPRESENTATIVE(S)

Name ID	Address	Nationality/Citizenship	Date Of Appointment	Date Of Cessation
-				

EXISTING SOLE-PROPRIETOR/PARTNER(S)

LEGAL RELATED SEARCH COUNT

(The number of times that the above company had been searched by Legal Firms using QuestNet)

Year	Total	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2020	0	0	0	0	0	0	0	0	0	0	0	0	0
2019	0	0	0	0	0	0	0	0	0	0	0	0	0
2018	0	0	0	0	0	0	0	0	0	0	0	0	0

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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 :

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. : 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. 51106300L

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.

 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. : 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.

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. : 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.: S1106300L

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.

 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. : 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.: S1106300L

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.

Authorised Signature



Stamford Tyres Int'l Pte Ltd
10 ANG MO KIO IND. PARK2A #01-14, S568047
ANG MO KIO MEGA MART
PH: 6483 3355, FAX: 655554776

RCB Reg. No.: 198904415C
GST Reg. No.: M2-008778-6
feedback@stamfordtyres.com
WORKORDER

CHEQUE RETAIL
SINGAPORE

DATE : 21/09/17 10:53:13 CAR NO.: NGS
INVOICE NO : / W/O D/O : 17000885/66
MILEAGE/CAR :
CUST PO : BY NGS TRADING

01-00607
1500/207

680

PRODUCT CODE	DESCRIPTION OF GOODS	QUANTITY	PRICE	AMOUNT
PCFA1258	245/40ZR18 FA FK453 97(Y) E S XL TL JP SFJ 1223T	2	320.00	640.00
PCFA1429	185/65R15 88H FA ZE914EC (A) E THAI SKW 5649U	4 ✓	80.00	320.00
PCFA1443	205/55R15 91V FA ZE914EC (A) E/S TH SKS 7242S,D/O:245980	4 ✓	100.00	400.00
PCC01135	245/45R17 C0 CSC5 99Y XL MO FRTL E/DOT EU SKW 8280G,D/O:245986	4 ✓	260.00	1,040.00
Total Amount Before 7.000 % of GST			2,242.99	
INCLUDES 7.000 % GST OF			157.01	
TOTAL			\$	2,400.00

Any irregularity of delivery should be reported within seven (7) days, otherwise no claim will be entertained.
Compound interests at the rate of 1% per month will be charged on late payment.
All cheques should be crossed and made payable to STAMFORD TYRES INTERNATIONAL PTE LTD or order.

GOODS RECEIVED IN GOOD ORDER & CONDITION

COMPANY STAMP

RECIPIENT'S SIGNATURE & DATE

FOR STAMFORD TYRES INTERNATIONAL PTE LTD.

STAMFORD Tires
INTERNATIONAL PTE LTD
星福泰輪胎有限公司

DELIVERY ORDER
CREDIT

19 LOK YAN WEE
JURONG, SINGAPORE 628635
TELEPHONE: (65) 6262 3355
FAX: (65) 6262 1494
Co. Reg. No.: 198504115C

GST Reg No: M2-0088778-6
Delivery Order No: **245980**

Date: 18 Feb 2011

Invoice To: _____

Deliver To: M/S TEENING

P/C No.: _____

A/C No.	Stock Code	Description	Quantity	U/M	Price	Gross	Disc	Nett Amt.
1510	TCR 155	155 R16 R15 H155 (S155 R155)	24		590.00			14160.00
1510	TCR 155	155 R16 R15 H155 (S155 R155)	24		590.00			14160.00
1510	TCR 155	155 R16 R15 H155 (S155 R155)	24		590.00			14160.00
TOTAL: 42480.00								

Any irregularity of delivery should be reported within 10 days of delivery.

Complaints received after 10 days will be treated as late complaints.

STAMFORD Tires International Pte Ltd, 198504115C

CUSTOMER ACCEPTANCE
GOODS RECEIVED / JOB COMPLETED

NAME: SIGNATURE & IC NO. _____

FOR STAMFORD Tires INTERNATIONAL PTE LTD

GST @: _____

TOTAL: _____

STORE COPY