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13 April 2021

By Email

LKK Auto Consultants Pte Ltd 51 Ubi Avenue 1 #01-25 Paya Ubi Industrial Park Singapore 408933

Attn: Mr Bryan Ang

Dear Sirs

HC/S 589/2020 - DANNY RAJ A/L MUNIAPPAN v ANG ZHIQIANG ACCIDENT INVOLVING MOTORCYCLE AND WHITE CAR ON 24 JULY 2017 ON THE SLE TOWARDS BKE

We act for AXA Insurance Pte Ltd in the above matter. The accident in question involved a motorcycle colliding into a white car ("SFJ1223T") driven by our insured which had broken down on the SLE.

We are instructed to engage you as an expert and seek your opinion on the following:

- (1) What are the likely causes(s) for SFJ1223T breaking down on the day in question before the accident:
- (2) Whether all cars which break down show a warning or alert before the car breaks down;
- (3) Whether SFJ1223T would have shown a warning or alert before the car broke down before the accident;
- (4) If a warning or alert would have been shown:
 - a. When would the warning or alert have shown;
 - b. How would the driver of SFJ1223T be warned or alerted;

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(5) Is it possible that no warning or alert was given before SFJ1223T broke down, or that the warning or alert was given just before SFJ1223T broke down.

SFJ1223T has been deregistered. We enclose the following documents for your reference:

- (1) Parties' pleadings in HC/S 589/2020; and
- (2) The AEICs affirmed by the Defendants' witnesses. The Plaintiff has not yet filed AEICs for his witness(es).
- (3) A dashcam video footage of the accident from the Defendant's witness.

Kindly let us hear from you soonest possible.

Thank you.

Yours faithfally

Vivekananda Devendarajah

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