



JusEquity Law Corporation

ADVOCATES & SOLICITORS • COMMISSIONER FOR OATHS

133 New Bridge Road #10-03 Chinatown Point, Singapore 059413
Telephone (65) 6536 9339, Fax : (65) 6536 5368 (Litigation & Conveyancing)
Email : claims@juseq.com.sg

Our Ref: JEQ/210056/0121/OMT-PI/cks

Your Ref: SH 6828Y

14 April 2021

To: CHUA KHENG YONG
220 Westwood Avenue
#07-05
Singapore 648352

BY POST
WITHOUT PREJUDICE

Cc: AXA INSURANCE SINGAPORE PTE LTD
8 Shenton Way #27-01
AXA Tower
Singapore 068811

BY EMAIL
WITHOUT PREJUDICE

Dear Sirs

CLAIMANT: MUHAMMAD RAFI'UDDIN BIN MOHD AMIN

**PROPERTY DAMAGE AND PERSONAL INJURY CLAIMS ARISING FROM ACCIDENT
INVOLVING VEHICLES FBR 8262P & SH 6828Y ALONG JURONG WEST STREET 42 ON 16
JANUARY 2021**

We are instructed by the abovenamed to claim damages against you in connection with an accident on 16th January 2021 along Jurong West Street 42 involving vehicle registration numbers FBR 8262P and SH 6828Y driven by you at the material time of the accident.

We are instructed that the accident was caused by your negligence in the driving, management and control of vehicle registration number SH 6828Y.

As a result of the accident, FBR 8262P was damaged and our client was injured and has been put to loss and expense, particulars of which are as follows:

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A. Special Damages

a) Transport expenses (till to-date)	\$	60.00
b) Medical / Consultation expenses (and continuing)	\$	633.41
c) Cost of repairs (lump sum)	\$	5,400.00
d) Loss of use for 10 days (8+2 days PRI) @ \$50.00 per day	\$	500.00
e) Loss of income for 14 days medical leave (from 16.01.2021 to 29.01.2021) (\$7,641.61 / 10 weeks x 14/7 days)	\$	1,528.32

B. General Damages

1) Pain and suffering

Brief description of injuries:

a) 2cm laceration on left side of scalp	\$	2,500.00
b) Multiple abrasions over both arms, legs and left shoulder regions	\$	2,500.00
c) Left rib fractures from 4 th to 7 th ribs	\$	10,000.00
d) Loss of consciousness	\$	2,000.00

C. Disbursements

a) Medical report fee	\$	88.00
b) Search & report fees / LTA / GIA	\$	36.49
c) Automobile survey fee	\$	592.00
d) PT's fee	\$	225.00

D. Legal cost (at this stage) + GST \$ 2,675.00

A copy each of the following supporting documents is enclosed:-

- Traffic police report lodged by our client;
- Two (2) GIA reports with sketch plan lodged by our client & the driver of SH 6828Y;
- LTA search result with receipt;
- Medical report and receipt from Ng Teng Fong Hospital;
- Tax invoices for medical expenses from Ng Teng Fong Hospital;

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- f) Medical certificate from Ng Teng Fong Hospital;
- g) Memo from Ng Teng Fong Hospital;
- h) Final repair bill from Ong Motor Pte Ltd;
- i) Survey report and invoice from Prudent Adjusters Services;
- j) Certificate of Insurance in respect of FBR 8262P;
- k) Tax invoices for GIA search & report fees;
- l) Copy of email from JusEquity Law Corporation to India International Insurance Pte Ltd; and
- m) Seventy-two (72) colour photographs depicting the damages sustained by FBR 8262P.

In compliance with the pre-action protocol under State Courts' Practice Directions 38, we propose using one of the following medical experts as a single joint expert:-

- i) Dr. Yeo Khee Quan from Yeo Orthopaedic Centre Pte Ltd;
- ii) Dr. James Lee Chong Hwa from James Lee Orthopaedic Surgery; and
- iii) Dr. Kishore Rajaguru from Ng Teng Fong Hospital.

Please note that if you are insured and you wish to claim under your insurance policy, you should immediately pass this letter and all the enclosed documents to your insurer.

Please note that you or your insurer should send to us an acknowledgement of receipt of this letter within 14 days of your receipt of this letter. If you or your insurer wish to have our client examined by your own medical expert, this should be stated in your acknowledgement of receipt. Please also advise within 14 days of the acknowledgement of receipt, where and when the examination of our client is to take place so that we may arrange for him to attend.

Should you fail to acknowledge receipt of this letter within 14 days, our client can commence court proceedings against you without further notice to you or your insurer.

Please also note that if you have a counterclaim against our client arising out of the accident, you are required to send to us a letter giving full particulars of the counterclaim together with all relevant supporting documents within 8 weeks of your receipt of this letter.

Yours faithfully

cc client
Enc

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