

**IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE**

MC / MC 18210 / 2019

Between

**WANG XIPO**  
(FIN No.: G0681612L)

... Plaintiff

And

**TONG TENG WAH, JIMMY**  
(NRIC No. S1801477G)

... Defendant

**AFFIDAVIT OF EVIDENCE-IN-CHIEF OF TONG TENG WAH, JIMMY**

I, **TONG TENG WAH, JIMMY** (NRIC NO. S1801477G), of 320 Upper East Coast Road #01-10 Singapore 466452, do hereby solemnly and sincerely affirm / make oath and say as follows: -

1. I am the Defendant in this action.
2. I make this affidavit to relate an incident ("**the Incident**") on 25 September 2018 at the junction of China Street and Church Street ("**the Junction**") involving motor vehicle no. SKP 9800J ("**my Car**") driven by me and motor vehicle no. SLL 5469T ("**Plaintiff's Car**") which I now know was driven by the Plaintiff.
3. At all material times, the traffic on the road was heavy along China Street. The weather was fine and road surface was dry. The junction of China Street and Church Street is a T-junction ("**T-Junction**"). China Street is the stem of the "T", while Church Street is the top of the "T".

4. The relevant portion of China Street is a dual carriageway separated by a concrete kerb. China Street in the direction of Church Street has two lanes, both dedicated for vehicles turning right onto Church Street. Church Street is a 5-lane road, with all 5 lanes dedicated for vehicles proceeding in the same direction.
5. On 25 September 2018, I was driving my Car along the left lane of China Street in the direction of Church Street. I had two other passengers in my Car: -
  - (a) my colleague, Tan Wei Lan, who was seated at the front passenger seat of my Car; and
  - (b) my colleague, Ong Tee Nee, who was seated at the right rear passenger seat of my Car.

(collectively referred to as “**Colleagues**”)

At all material times, my Colleagues and I were having a conversation. We were heading out for lunch at the material time.

6. While I was driving my Car onto the rightmost lane of Church Street from the left lane of China Street, I noticed that the Plaintiff's Car suddenly dashed forward and appeared ahead of my Car on my right. Upon noticing the presence of the Plaintiff's Car, I instinctively swerved my Car to the left and immediately applied the brakes to my Car. I was able to swerve left and apply the brakes to my Car in time to avoid a collision

between my Car and the Plaintiff's Car. I would like to state that there was no contact at all between the Plaintiff's Car and my Car.

7. The Plaintiff then alighted from the Plaintiff's Car and started taking photographs. I wound down my Car's window and apologised to the Plaintiff for possibly making too sharp a right turn from China Street onto Church Street and thus causing my Car to come close to the Plaintiff's Car. Although there was no contact between my Car and the Plaintiff's Car, I felt apologising was the right thing to do if I had made too sharp a right turn into Church Street.
8. The Plaintiff merely said that he would be asking his insurers to contact me with regard to the Incident and that I should wait for his insurer's call. He then got back into the Plaintiff's Car and drove off.
9. I am the Managing Director of the General and Group Insurance arm of The Great Eastern Life Assurance Co Ltd. I was puzzled by what the Plaintiff said to me as there were no contact / collision between the Plaintiff's Car and Car. After I had swerved my Car to the left, applied the brakes to my Car and both my Car and the Plaintiff's Car came to a stop, I could see that there was a gap between the left portion of the Plaintiff's Car and the right portion of my Car.
10. I also did not feel / hear any impact to my Car. It can also be seen from the photographs taken by the Plaintiff that there was no contact between the Plaintiff's Car and my Car. Copies of the photographs taken at the scene by the Plaintiff are now produced and shown to me marked as exhibit "TTWJ-1".

11. Since there was no contact between the left portion of the Plaintiff's Car and the right portion of my Car and since the Plaintiff drove off immediately after coming down to take photographs, I thought nothing of the Incident. I too drove off and headed for lunch with my Colleagues as planned. However, all of us did think that the Incident was strange. We discussed about the Incident for a while before we lapsed back into the conversation topic prior to the Incident.
12. Thereafter, I did not keep this Incident in mind and had almost forgotten about it until I received a letter from the Plaintiff's ex-solicitors claiming for property damage on behalf of the Plaintiff. Accordingly, I had to lodge a report of this Incident. A copy of my Singapore Accident Statement dated 01 October 2018 is now produced and shown to me marked as exhibit "**TTWJ-2**".
13. Upon receiving the letter stated in paragraph 12 above, I also arranged for a surveyor to take photographs of my Car to document the condition of my Car. The photographs show that there was no damage to my Car. Copies of the photographs of my Car taken by the surveyor is now produced and shown to me marked as exhibit "**TTWJ-3**".
14. I am advised that the Plaintiff's claim against me is for cost of repairs and rental charges. I am very sure that there was no contact between the Plaintiff's Car and my Car. If there is any damage to the Plaintiff's Car, it could not have been caused by my Car. At best, the Plaintiff's claim is misconceived. At worst, it is something far more sinister.

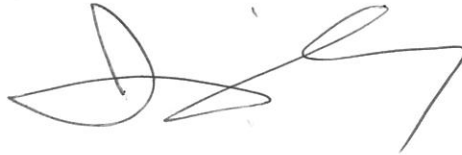
15. In the premises, I humbly pray for the Plaintiff's claim against me be dismissed with costs.

  
**SWORN / AFFIRMED** in Singapore )

By the abovenamed )

**TONG TENG WAH JIMMY** )

on this 4<sup>th</sup> day of December 2020 )



Before me,



**A COMMISSIONER FOR OATHS**



This Affidavit is filed on behalf of the Defendant.

THIS IS THE EXHIBIT MARKED "TTWJ-1"  
REFERRED TO IN THE  
AFFIDAVIT OF EVIDENCE-IN-CHIEF OF  
**TONG TENG WAH JIMMY**  
SWORN / ~~SWORN~~ AFFIRMED ON  
THIS 4TH DAY OF DECEMBER 2020

BEFORE ME



A COMMISSIONER FOR OATHS



**UNITED LEGAL ALLIANCE LLC**

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**ADVOCATES & SOLICITORS**



THIS IS THE EXHIBIT MARKED "TTWJ-2"

REFERRED TO IN THE  
AFFIDAVIT OF EVIDENCE-IN-CHIEF OF

**TONG TENG WAH JIMMY**

SWORN / ~~AFFIRMED~~ ON

THIS 4TH DAY OF DECEMBER 2020

BEFORE ME



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A COMMISSIONER FOR OATHS





## SINGAPORE ACCIDENT STATEMENT

### IMPORTANT NOTICE

1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Authorised Driver.
3. Information provided must be as truthful and accurate as possible. Any wilful misrepresentation or withholding of material facts may allow insurance companies to repudiate policy ability.
4. The issue and acceptance of this Form by insurance companies is not an admission of policy liability on the part of the insurance companies.
5. **Any false reporting may be referred to the Police for investigation.**
6. This report will be forwarded by the insurers of the GIA Records Management Centre established by the General Insurance Association of Singapore (GIA) for archiving and that copies of this report will, for a fee, be made available upon application by interested parties.
7. By the lodgement of this report to the insurers, you hereby consent to the archiving of this report at the centre and to copies of the report being made available aforesaid.

### ACCIDENT STATEMENT

Date Of Report	01/10/2018 14:20
Date Of Accident	25/09/2018 12:05
Exact Location Of Accident	TURNING FROM CHINA STREET TO CHURCH STREET
Country/State of Loss	SINGAPORE

### DETAILS OF OWN VEHICLE

Vehicle Registration Number	SKP9800J
<b>Insured/Policyholder</b>	
Name Of Registered Owner	TONG TENG WAH JIMMY
NRIC No	S1801477G
Email Address	NOEMAIL
Mobile Phone No	(LOCAL) +65-97591128
Alternative Phone No	OTHERS-97591128

### Vehicle Particulars

Manufacturer	MERCEDES-BENZ
Model	200E-2.0 (A)
Exact Purpose for which vehicle was being used at time of accident	
Are you claiming under your own insurance policy for repair to your vehicle?	NO
If No, Please state action to be taken	REPORTING ONLY
Vehicle Category	PRIVATE CAR

### Insurance Company

Name of Insurance Company	GREAT EASTERN GENERAL INSURANCE LIMITED
Type Of Coverage	COMPREHENSIVE
Fleet Policy	NO
Policy Number	V0097795
Cover Note Number	

### Driver

Name of Driver	TONG TENG WAH JIMMY
NRIC No	S1801477G
Date Of Birth	06/01/1967
Occupation	INDOOR
Date Of Driving Pass	03/03/1987
Driving Experience	31 YEARS AND 6 MONTHS
Gender	MALE
Mobile Number	(LOCAL) +65-97591128
Fax Number	
Contact Number	OTHERS-97591128
EMail Address	NOEMAIL

Address	320 UPPER EAST COAST ROAD, #01-10 BREEZE BY THE EAST
Postcode	466452
Was driver an employee of the Insured's Company	NO
If No, Relationship of the Driver with the Insured	OWNER
Vehicle Registration Number of Driver's Own Vehicle	SLP9800Y
	-
	-
Insurance Company of Driver's Own Vehicle	GREAT EASTERN GENERAL INSURANCE LIMITED
	-
	-

#### General Information of the Accident

Type Of Accident	NO COLLISION
Weather Conditions	CLEAR
Road Surface	DRY

#### Other Information

Was any foreign vehicle involved in this accident?	NO
Number of vehicles involved in the accident	
Was any body injured in the Accident?	NO
Was any injured conveyed to hospital by ambulance?	NO
Was any other material or property damaged?	NO
I have been approached by unknown person(s) soliciting/offering accident claims assistance.	NO
Number of Passengers (Including Driver)	3
Passenger 1	NAME: : ONG TEE NEE GENDER: : FEMALE
Passenger 2	NAME: : TAN WEI LAN GENDER: : MALE

#### Details of Police Action

Was the accident reported to the police?	NO
If Yes, Please state which Police Station	
Was notice of intended Prosecution given?	NO
If Yes, against whom?	

#### Circumstances of Accident

KINDLY REFER ATTACHED

#### Attachment(s)

Are accident photos available for attachment?	NOT AVAILABLE DUE TO CIRCUMSTANCES OF ACCIDENT
Was there any video captured by Car Camera?	NO
Was there any audio recorded?	NO

#### Details of Witness 1

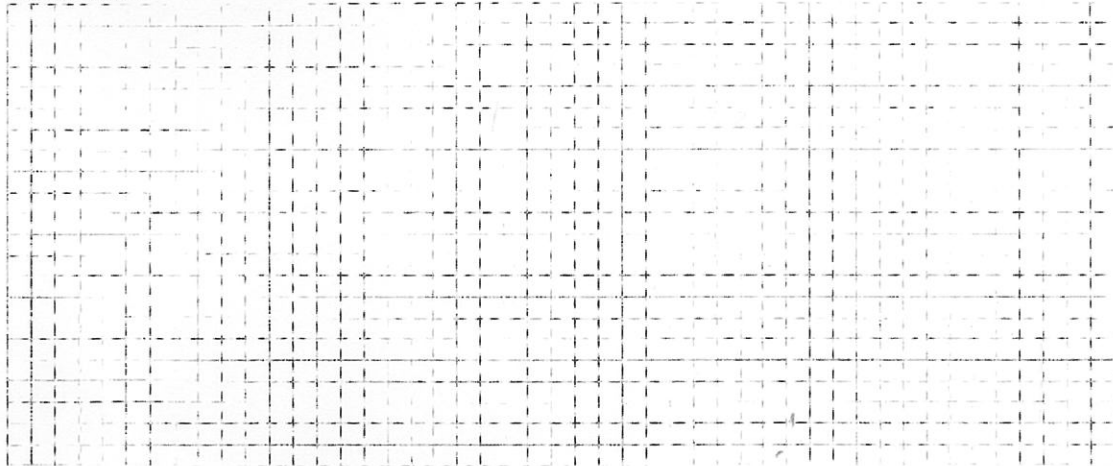
Name	ONG TEE NEE
Phone Number	
Email Address	

#### Details of Witness 2

Name	TAN WEI LAN
Phone Number	
Email Address	

## Sketch Plan

### SKETCH PLAN



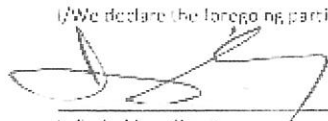
### DESCRIBE CIRCUMSTANCES OF THE ACCIDENT

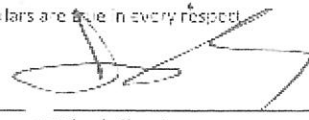
I was turning right from China Street towards Church Street. When turning, my car was very close to the other vehicle and I and the other vehicle managed to stop in time. There was no swipe and no collision. I apologised to the other vehicle driver for driving too close to his vehicle.

As there was no collision nor swipe, I left it as that and I see no need to submit any claims for own or third party damages. There were two colleagues in my car and they can verify that both vehicles stopped in time and there was no damage to either vehicle.


### DECLARATION

I/We declare the foregoing particulars are true in every respect.

  
x Policyholder's Signature  
Date & Time: 11/01/18

  
x Driver's Signature  
(If Driver is not the policyholder)  
Date & Time: 11/01/18

\_\_\_\_\_  
Reporting Centre Personnel's Signature  
Name:  
NRIC/FIN No:

THIS IS THE EXHIBIT MARKED "TTWJ-3"  
REFERRED TO IN THE  
AFFIDAVIT OF EVIDENCE-IN-CHIEF OF  
**TONG TENG WAH JIMMY**  
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