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17 May 2021

LKK Auto Consultants Pte. Ltd.
Block 51 Ubi Avenue 1
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BY E-MAIL ONLY

Attn: Mr Bryan Ang

Our Ref	Your Ref	No. of Pages
AWE/FDK/GEG/0205/rh	Please advise	1/6

MC / MC 18210 / 2019 (“the Suit”)

ACCIDENT ON 25.09.2018 INVOLVING MOTOR VEHICLE NO. SKP 9800J AND MOTOR VEHICLE NO. SLL 5469T ON 25 SEPTEMBER 2018 TURNING FROM CHINA STREET TO CHURCH STREET (“the Incident”)

Dear Sirs,

1. We refer to the matter above and the letter from C Yogarajah LLC dated 07 May 2021
2. We act for Great Eastern General Insurance Limited (“**our Clients**”), who are the insurers of motor vehicle number SKP 9800J, the driver of which is the Defendant in the Suit. C Yogarajah LLC acts for the Plaintiff in the Suit.
3. Our Clients have agreed to appoint you as the Single Joint Expert in the field of accident reconstruction. We note the directions from Court that the Accident Reconstruction report will need to be ready by 28 May 2021.

A. Background of the Incident

4. The Incident was an alleged collision between motor vehicle number SKP 9800J (“**SKP 9800J**”) and motor vehicle SLL 5469T (“**SLL 5496T**”) on 25 September 2018 at around 12:05 p.m..

5. Subsequent to the Incident, the driver of SLL 5496T (“**the Plaintiff**”) had commenced civil action against the driver of SKP 9800J, who is our Clients’ insured driver (“**the Insured Driver**”).
6. The Insured Driver is our Client’s Managing Director of their General and Group Insurance arm. He was on his way out for lunch with his 2 colleagues.
7. The Insured Driver had just driven SKP 9800J onto China Street from the car park exit of Great Eastern Centre.
8. The Incident occurred along the junction between China Street and Church Street. The Insured Driver was driving north-eastward along the 2nd lane (from the right) (“**2nd Lane**”) of China Street towards Church Street. China Street is a dual-carriageway spanning 3 lanes in total, 2 heading north-east and 1 heading south-west. The 2 directions of travel on China Street is divided by a raised concrete kerb. Both lanes of China Street north-eastward are right-turn-only lanes which allow traffic to turn into Church street. The following are images from Google Maps street view and satellite view of the place of the Incident.





9. There is no video of the Incident available. The following are the accounts of the parties with respect to how the incident occurred. We note that the Plaintiff's account significantly differs from the Insured Driver's account.
10. The Insured Driver recounts in his Affidavit of Evidence-in-Chief ("AEIC") that: -
 - a. He was driving along the 2nd Lane of China Street headed north-east and was intending on making a right turn into Church Street. 2 of the Insured Driver's colleagues, one Ms Ong Tee Nee and one Mr Tan Wei Lan, were passengers in SKP 9800J;
 - b. At the time before proceeding with the turn, the Insured Driver admitted that he had initiated a right turn into the 1st lane (from the right) of Church Street when he was supposed to turn into the 2nd lane (from the right) of Church Street ("**the Turn**");
 - c. In the midst of the Turn, SLL 5496T suddenly dashed forward and appeared on the Insured Driver's Right;
 - d. Upon noticing SLL 5496T, the Insured Driver swerved SKP 9800J to the left instinctively and stopped SKP 9800J. SLL 5496T had also stopped;



- e. The Insured Driver insists that there was no contact between SKP 9800J and SLL 5496T and that he did not feel any jerking or shaking motion nor did he hear a “bang” sound;
 - f. After the Incident, the Insured Driver inspected SKP 9800J and found no damage on SKP 9800J, in particular, no damage to the right side of SKP 9800J.
11. Subsequent inspection of SKP 9800J by a loss adjuster also found that there was no damage that was sustained from the incident.
12. The Plaintiff recounts in his AEIC that:-
- a. Traffic was heavy at the time of the incident and weather conditions were clear and dry;
 - b. He was driving on the 1st lane (from the right) of China Street (“**1st Lane**”) headed north-east towards Church Street;
 - c. He had joined a row of cars along the 1st Lane waiting to make a right turn into Church Street and was moving slowly towards the junction;
 - d. Before turning right, the Plaintiff inched SLL 5496T forward towards the edge of the yellow and angled SLL 5496T slightly to the right to gain a better view of the road;
 - e. SLL 5496T was stationary before turning right;
 - f. As the Plaintiff was looking left for incoming traffic, he suddenly saw and heard SKP 9800J collide into the front left portion of SLL 5496T;
 - g. The Plaintiff insists that SLL 5496T sustained damage to the back of the left side mirror and that SKP 9800J had its right side mirror dislodged from its original position; and
 - h. The Plaintiff also insists that the right fender and right front wheel rim of SKP 9800J had collided into the left portion of SLL 5496T causing damage to the left bumper, front left fender and front left wheel rim.



13. The details of the motor vehicles involved in the Incident are as follows: -

Registration No.	Make	Driver	Registered Owner
SKP 9800J	Mercedes-Benz 200E Sedan (R18)	Tong Teng Wah Jimmy	Tong Teng Wah Jimmy
SLL 5496T	Volkswagen Jetta GP 1.4 TSI 90 A/T TL 1632G7	Wang Xipo	Wang Xipo

B. Your Expert Opinion

14. We would require your expertise to reconstruct the Incident.

15. The main issue is whether there was any contact between SKP 9800J and SLL 5496T. In particular: -

- Whether damage to the back of the left side mirror of SLL 5496T could have been possible had the Incident occurred in the manner described by the Plaintiff (i.e. that SKP 9800J approached SLL 5496T from the rear left of SLL 5496T);
- Whether damage to the front left bumper of SLL 5496T could have been possible had the Incident occurred in the manner described by the Plaintiff;
- Whether damage to the front left fender of SLL 5496T could have been possible had the Incident occurred in the manner described by the Plaintiff; and
- Whether damage to the front left wheel rim of SLL 5496T could have been possible had the Incident occurred in the manner described by the Plaintiff.

16. In addition, we are instructed and would like your expert opinion on whether the images on pages 34 and 35 of the Plaintiff's AEIC depict:

- Damage to the right fender of SKP 9800J;



- b. A reflection of something on the right fender of SKP 9800J; or
 - c. any other reasons that the images look like that as seen on pages 34 and 35 of the Plaintiff's AEIC.
17. We enclose herewith the following documents for your reference: -
- a. Singapore Accident Statement of the Insured Driver dated 01 October 2018;
 - b. Singapore Accident Statement of the Plaintiff dated 26 September 2018;
 - c. Affidavit of Evidence-In-Chief of the Insured Driver;
 - d. Affidavit of Evidence-In-Chief of Ong Tee Nee, who was a passenger in SKP 9800J;
 - e. Affidavit of Evidence-In-Chief of Tan Wei Lan, who was a passenger in SKP 9800J;
 - f. Affidavit of Evidence-In-Chief of the Plaintiff;
 - g. Photographs of SKP 9800J taken by the Loss Adjusters of SKP 9800J; and
 - h. Vehicle Damage Inspection Report by JP Knights Adjusters & Surveyors dated 11 March 2019.
18. Please feel free to contact us at 6335 5848 (Mr Fendrick Koh – Ext 107) or by e-mail to fendrick@titaniumlaw.com.sg should you have any queries.
19. Thank you.

Yours faithfully,

Anthony Wee / Fendrick Koh
Titanium Law Chambers LLC

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Encs.