

26 October 2021

**INDIA INTERNATIONAL INSURANCE  
PTE LTD**

64 Cecil Street #04  
#05 IOB Building  
Singapore 049711  
(Insurers of SLH 9587E)

**BY EMAIL (lod@iii.com.sg) &  
BY POST WITH ENC**

**MSIG INSURANCE  
(SINGAPORE) PTE LTD**

4 Shenton Way  
#21-01  
Singapore 068807  
(Insurers of SLH 9587E)

**BY EMAIL (claims@sg.msig-asia.com) &  
BY POST WITH ENC**

**GRAB RENTALS PTE LTD**

28 Sin Ming Lane  
#01-143  
Singapore 573972  
(Owner of SLH 9587E)

**BY POST W/O ENC**

**LEONG KUM SING**

Blk 317 Woodlands Street 31  
#12-180  
Singapore 730317  
(Driver of SLH 9587E)

**BY POST W/O ENC**

Dear Sirs,

**ACCIDENT INVOLVING SLP 6184L & SLH 9587E AT OR ALONG THE EXIT OF PIE  
TOWARDS PAYA LEBAR ROAD ON OR ABOUT 20 AUGUST 2021**

1. We act for Mr Tan Cheng Lian, the owner / driver of SLP 6184L involved in the above captioned accident.
2. On or about 20 August 2021, at / along the exit of PIE towards Paya Lebar Road, there was an accident involving SLP 6184L and SLH 9587E. It is noted that the driver of SLH 9587E had negligently driven and / or managed SLH 9587E, thereby causing the accident between SLP 6184L and SLH 9587E.
3. We note that as per attached LTA search results, both MSIG Insurance (Singapore) Pte Ltd and India International Insurance Pte Ltd appear to be the insurers of SLH 9587E at the material time of the accident. However, the GIA report of SLH 9587E would suggest that India International Insurance Pte Ltd were the insurers of SLH 9587E. On that note, would MSIG Insurance

51 Goldhill Plaza #10-01, Goldhill Plaza, Singapore 308900  
T. 6222 5562 ■ F: 6222 5561  
(we do not accept service of Court documents by fax)

Characterist LLC (Incorporating Lie Kee Pong Partnership) UEN/GST No. 200501945H  
Advocates & Solicitors | Commissioners for Oaths | Notary Public  
Characterist LLC is incorporated with limited liability

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Lie Chin Chin  
Daniel Goh Choon Wah

**Consultant**  
Lie Kee Pong

**Directors**  
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**Senior Associate**  
Nicole Chee

**Associates**  
Cheston Ow  
Lee Hui Yi

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AT WORK**

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(Singapore) Pte Ltd and India International Insurance Pte Ltd please let us know who are the rightful insurers that should be dealing with this claim.

4. Following from the above, we also note that Grab Rentals Pte Ltd were the owners and Leong Kum Sing was the driver of SLH 9587E at the material time of the above accident.
5. On the issue of liability, please find enclosed the following: -
  - a. GIA report / Accident Statement of Tan Cheng Lian, the owner/driver of SLP 6184L dated 22 August 2021 of three (3) pages together with sketch plan of two (2) pages and photographs showing damages to SLP 6184L of nine (9) pages;
  - b. GIA report / Accident Statement of Leong Kum Sing, the driver of SLH 9587E dated 25 August 2021 of two (2) pages together with sketch plan of two (2) pages and photographs showing damages to SLH 9587E of five (5) pages and photographs taken at the accident scene of three (3) pages; and
  - c. Front in-car video footage of SLP 6184L showing how the accident happened:  
<https://www.dropbox.com/s/yrw1nep1976592/WhatsApp%20Video%202021-08-24%20at%2013.21.27.mp4?dl=0>
6. On the issue of quantum, please find enclosed the following: -
  - a. Proforma Invoice from JP Conceptz Pte Ltd for the sum of \$4,544.77 dated 8 September 2021 of one (1) page;
  - b. Satisfactory voucher from JP Conceptz Pte Ltd dated 30 August 2021 of one (1) page;
  - c. Invoice from Pro Plus Automobile Engineers for the Vehicle Damage Inspection Report for the sum of \$705.00 dated 1 September 2021 of one (1) page;
  - d. Vehicle Damage Inspection Report from Pro Plus Automobile Engineers dated 1 September 2021 of five (5) pages together with inspection photographs of fourteen (14) pages; and
  - e. Vehicle rental agreement from Autobahn Rent A Car Pte Ltd dated 25 August 2021 for the period from 24 August 2021 to 30 August 2021 for \$840.00 of four (4) pages.
7. As a result of the aforesaid negligence, our clients suffered the following losses: -

(a) Costs of repairs:	\$3,638.00
(b) Rental fees: (For the period of 24/08/21 to 30/08/21)	\$840.00
(c) Survey report fees:	\$705.00
(d) LTA/GIA search/report fees:	\$36.49

(c)	Legal costs / disbursements contribution at this stage:	\$600.00
	<b>TOTAL:</b>	<b>\$5,819.49</b>

8. Any settlement reached in this claim is on the basis that it does not prejudice any other relevant action that may arise out of this accident, in particular the uninsured losses claim if any.
9. We hereby give MSIG Insurance (Singapore) Pte Ltd and/or India International Insurance Pte Ltd notice as insurers of SLH 9587E that if the above is not acceptable, our client intends to proceed with the issue of Writ of Summons against your insured. In this regard, please give us an acknowledgment of receipt and also let us know if you are instructing a firm of solicitors to accept Service of process on behalf of your insured within **fourteen (14) days** of your receipt of this letter. Failing which, our client will have no alternative but to commence proceedings against you without further notice.
10. For Grab Rental Pte Ltd, please let us know within the next **seven (7) days** if you are taking the position that Leong Kum Sing was not your authorised driver / servant / agent of SLH 9587E at the material time of the accident. If we do not hear from you within the next **seven (7) days** and in any event **by 20 October 2021**, we will proceed on the basis that Leong Kum Sing was your authorised driver / servant / agent without further reference to you, and further that you agree to be bound by an extent of negligence found against him.
11. Please also note that if you have a counterclaim against our client arising out of this accident, you are also required to send to us a letter giving full particulars of the counterclaim together with all relevant supporting documents within **eight (8) weeks** of your receipt of this letter.

Yours faithfully,



f. Daniel Goh  
(Characterist LLC)  
*Encs*