

5. Prior to repair, YP 6245R was surveyed by Mr. Michael Ee of KM Auto Assessors Pte. Ltd. (hereinafter referred to as "KM Auto"). The recommended cost of repair by KM Auto was the lump sum of \$ 14,900.00 and the estimate period for repair was 24 days.
6. Repairs were completed on or about 13/01/20 and the cost of repair was \$ 15,943.00 inclusive of GST (i.e. \$ 14,900.00 as per KM Auto's recommendation plus GST).
7. Prior to repair, YP 6245R was also inspected by a surveyor from LKK Auto Consultant Pte Ltd (hereinafter referred to as "LKK"), namely one, Mr. Xing Guo Qiang.
8. Both KM Auto and LKK recommended cost of repair on a lump sum basis. When repair is undertaken on lump sum basis, the repairer is at liberty to :
 - (1) Replace any damaged parts with used, reconditioned or new parts.
 - (2) Repair any damaged body parts that the repairer is confident and capable of repairing to a roadworthy condition and to the entire satisfaction of the owner.
9. In this regard, I respectfully refer the court to the letter from the Singapore Automobile Appraiser Association dated 07/01/14, a copy of which is exhibited herein.
10. I have read the inspection report by LKK. There are some disputed items and I wish to address the same. The photographs annexed to KM Auto's report have been numbered for ease of reference and the photographs referred to below are the photographs annexed to KM Auto's report.
11. With regard to the disputed items, I wish to say the following :-
 - (i) **Cabin rear windscreen glass rubber** : LKK's report stated that this item was serviceable.

comment: not consistent with accident

(a) As evidenced by the photographs taken by KM Auto namely photographs no. 89, 90, 92, 93, 94, 95 and 96, the said glass rubber was twisted and deformed. As it was rubber, it could not be repaired. Further, it was in any event necessary to replace the rubber because the rear windscreen had to be removed for the purpose panel beating the rear cabin and once the rear windscreen was removed, the cabin rear windscreen rubber would be damaged and cannot be re-used.

(ii) **1 piece cab front panel sealant** : LKK's report stated that this item was serviceable.

comment: not necessary to use

(a) The cab front panel assy had to be removed for the purpose of panel beating and once the cab front panel assy was removed, the cab front panel sealant would be damaged and had to be replaced. I therefore do not agree that this item was not necessary.

(iii) **1 set front grille clips** : LKK's report stated that this item was serviceable.

comment: not necessary to change

(a) This item was necessary because as evidenced by photographs no. 102, 104, 105 and 107, the front grille clips were damaged.

(b) Front grille clips are the plastic clips that hold the front grille. The front grille of YP 6245R was made of plastic and it had to be replaced.

(c) When the damaged front grille was removed, the front grille clips, being made of plastic, were damaged and could not be re-used.

(iv) **1 piece front no. plate** : LKK recommended \$ 15.00 for this item whereas KM Auto recommended \$ 30.00.

comment: it's base on market rate

(a) I do not agree with LKK's recommendation because the market price for number plates range between \$ 25.00 and \$ 35.00 each.

- (vi) **1 piece tailgate mounting crossbar sticker** : LKK recommended \$ 30.00 for this item whereas KM Auto recommended \$ 80.00.

comment: it's base on market rate

- (a) I do not agree with LKK's recommendation because for this item, the supplier was the one who supply and paste the sticker. The supplier had to come to our workshop to do the job and I have not come across a supplier who would supply and paste sticker at a sum of \$ 30.00. The market rate for supply of the sticker plus the labour of pasting it is in the range of between \$ 80.00 to \$ 100.00.

- (vii) **1 set tailgate hydraulic cylinder pumps assy –short** : LKK recommended \$ 400.00 for this item whereas KM Auto recommended \$ 2,400.00.

comment: during after repair inspection I found 2 items used back after repair, the benefit of the doubt I can only approved for labour.

- (a) I do not agree with LKK's recommendation because a brand new tailgate hydraulic cylinder pumps assy – short cost around \$ 2,400.00. I shall address further on the cost of this item below.

- (viii) **1 set tailgate hydraulic cylinder pumps assy –long** : LKK recommended \$ 400.00 for this item whereas KM Auto recommended \$ 3,000.00.

comment: during after repair inspection I found 2 items used back after repair, the benefit of the doubt I can only approved for labour.

- (a) I do not agree with LKK's recommendation because a brand new tailgate hydraulic cylinder pumps assy – long cost around \$ 3,000.00.

- (b) With regard to both the tailgate hydraulic cylinder pumps assy – short and tailgate hydraulic cylinder pumps assy long, when I knew that these two parts had to be replaced, I started sourcing and checking with suppliers for availability and cost of both new and re-conditioned ones. I contacted Ng Wah Hong Enterprise Pte Ltd to inquire on the costs of these parts and I was verbally informed that new tailgate hydraulic cylinder pumps assy – short cost \$2,400.00 (excluding GST) and new tailgate hydraulic cylinder pumps assy – long cost \$ 3,000.00 (excluding GST).

- (c) At that time I did not ask for a written quotation from Ng Wah Hong Enterprise Pte Ltd. Subsequently, I managed to obtained re-conditioned

parts which cost about \$ 1,200.00 for tailgate hydraulic cylinder pumps assy – short and about \$ 1,500.00 for tailgate hydraulic cylinder pumps assy – long.

- (d) For the purpose of proving the cost of new parts in respect of these two items, I have obtained a written quotation from Ng Wah Hong Enterprise Pte Ltd, a copy of which is exhibited herein.

(viii) **2 pieces rear lamps assy** : LKK's report stated that this item was serviceable.
comment: during after repair inspection I found 2 items used back after repair. the mentioned photos not showing any damages.

- (a) I do not agree with LKK's recommendation because as evidenced by photographs no. 9, 10, 12, 22, 23, 24, 27, 45 and 47 the rear lamps assy were damaged.

- (ix) **2 pieces rear lamps brackets** : LKK's report stated that this item was serviceable.

comment: during after repair inspection I found 2 items used back after repair. the mentioned photos not showing any damages.

- (a) I do not agree with LKK's recommendation because as evidenced by photographs no. 9, 10, 12, 22, 23, 24, 27, 45 and 47 the rear lamps brackets were damaged.

- (x) **1 pieces rear no. plate** : : LKK recommended \$ 15.00 for this item whereas KM Auto recommended \$ 30.00.

COMMENT: IT'S BASE ON MARKET RATE

- (a) I do not agree with LKK's recommendation because number plates cost between \$ 25.00 and \$ 35.00 each.

- (xi) **1 piece rear no. plate bracket** : LKK recommended \$ 30.00 for this item whereas KM Auto recommended \$ 45.00.

COMMENT: IT'S BASE ON MARKET RATE

- (a) I do not agree with LKK's recommendation because number plate brackets cost between \$ 40.00 and \$ 50.00 each.

- (xii) **1 piece rear underrun bumper assy** : LKK's report stated that this item was serviceable.

comment: during after repair inspection I found this item used back after repair. the mentioned photos not showing any damages.

- (a) I do not agree with LKK's recommendation because as evidenced by photographs no. 53, 54, 55, 56, 57, 58, 58, 60, 61, 62. 63, 64, 65, 66, 67, 68, 74, 76, 78, 80, 197, 199, 200 202, 210 and 211, the rear underrun bumper assy was bent and displaced.

- (b) For the purpose of comparison, I respectfully refer the court to photographs no. 263 and 267 which show the post repair underrun bumper assy.

LABOUR

- (xiii) **Remove necessary cabin interior upholstervys and fittings to enable necessary repairs, check and refit the same** : LKK recommended \$ 60.00 for this item whereas KM Auto recommended \$ 120.00.

comment: it's base on industry practice

- (a) Based on the Singapore Automobile Appraisers Association guide published in 2008, the labour charge for this portion of the work ranges between \$ 60.00 and \$ 120.00. The said guide was published 12 years ago and taking into account amount of work required and inflation, the recommendation of \$ 60.00 (lowest in the range) by LKK is too low.

- (xiv) **Remove cabin rear windscreen glass to enable necessary repair, renew glass rubber and refit glass assy** : LKK's report stated that this item was not necessary.

comment: not consistent with accident

- (a) As evidenced by photographs no. 89, 90, 91, 92, 180, 181, 182, 183, 184, 188, 189, 191, 192, 193, 194, 195, 196 and 198, the cabin rear was damaged. The cabin rear windscreen was removed so that panel beating could be done on the cabin rear. If the windscreen was not removed, the panel beating would cause it to crack. I therefore do not agree that this item was not necessary.

- (xv) Dismantle and remove tailgate assy and fittings, check, straighten up and repair tailgate assy, tailgate mounting crossbar assy, renew all hydraulic cylinder assy, refit, top up hydraulic fluid, reassemble, refit tailgate assy and test hydraulic system. Lift out and remove rear carriages' aluminium canopy assy to enable necessary repairs, check, lift up, refit and realign same, after necessary repairs. Disconnect, lift out rear carriage assy, repairs and rebuild carriage assy, including repairs to front reinforcement frame assy, n/s sidegate assy and hinges, carriage rear body crossmember, n/s body side member and floorboard assy, lift up, refit, realign same on main chassis frame assy. Paint rear carriage assy. Remove lamps, necessary wirings and electrical fittings to enable necessary repairs, check, replace damaged parts, refit same, test electrical circuit.

LKK recommended \$ 800.00 for the aforesaid labour whereas KM Auto recommended \$ 3,200.00.

comment: it's base on industry practice

- (a) This part of the labour was sub-contracted to Ng Wah Hong Enterprise Pte Ltd as they specialize in the repairing of tailgate assy. The cost charged by Ng Wah Hong Enterprise Pte Ltd was already \$ 2,800.00 plus GST i.e. \$ 2,996.00. Hence, I do not agree with LKK's recommendation.

- (xvi) Jack out, straighten up and realign main chassis frame assy : LKK's report stated that this item was not necessary.

comment: the mentioned photos not showing any chassis repair job

- (a) As evidenced by photographs no. 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218 and 219, the chassis frame was bent and needed to be straighten. Before the chassis frame could be straighten, jack out would be necessary and after straightening the chassis frame, it has to be realigned. Hence, I do not agree that this item was not necessary.