

# 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/210621/1021/HC-PI/cks

Your Ref:

SHC 8143H

9 May 2022

To: AXA INSURANCE SINGAPORE PTE LTD

8 Shenton Way #27-01

**AXA Tower** 

Singapore 068811

BY EMAIL

WITHOUT PREJUDICE

Cc: NG SER HUA

Blk 224 Simei Street 4

#05-108

Singapore 520224

BY POST

WITHOUT PREJUDICE

Dear Sirs

**CLAIMANT: SULAIMAN BIN DAUD** 

PROPERTY DAMAGE AND PERSONAL INJURY CLAIMS ARISING FROM ACCIDENT INVOLVING VEHICLES FBS 8346B & SHC 8143H ALONG NEW UPPER CHANGI ROAD ON 24 OCTOBER 2021

We are instructed by the abovenamed to claim damages against you in connection with an accident on 24th October 2021 along New Upper Changi Road involving vehicle registration numbers FBS 8346B and SHC 8143H driven by you at the material time of the accident. Our client was the owner and rider of FBS 8346B 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 SHC 8143H.

As a result of the accident, FBS 8346B 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
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a) Transport expenses	\$ 30.00
b) Medical / consultation expenses	\$ 26.75
c) Cost of repairs (lump sum)	\$ 6,000.00
d) Loss of use for 16 days (14+2 days PRI) @ \$50.00 per day	\$ 800.00

### B. General Damages

1) Pain and suffering

#### Brief description of injuries:

a) Left shoulder sprain	\$ 1,500.00
b) 4cm diameter bruise over the volar aspect of the right forearm	\$ 1,000.00
c) 8cm diameter abrasion over the left forearm	\$ 1,000.00
d) 2cm diameter abrasion over the right forearm	\$ 1,000.00

#### C. Disbursements

a) Medical report fee	\$ 192.60
b) Search & report fees / LTA / GIA	\$ 36.49
c) Automobile survey fee	\$ 596.00

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

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

- a) Two (2) GIA reports with sketch plan lodged by our client & the driver of SHC 8143H;
- b) LTA search result with receipt;
- c) Medical report and invoice from Northeast Medical Group;
- d) Tax invoice for medical expenses from Northeast Medical Group;
- e) Medical certificate issued in respect of our client;
- f) Invoice from HL Cycle Pte Ltd;

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- g) Survey report and invoice from CL Appraiser Pte Ltd;
- h) Tax invoices for GIA search & report fees;
- i) Certificate of Insurance in respect of FBS 8346B;
- i) Copy of email from JusEquity Law Corporation to AXA Insurance Pte Ltd; and
- k) One hundred and sixteen (116) colour photographs depicting the damages sustained by FBS 8346B.

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. Amy Wee Lay Kuan from Northeast Medical Group.

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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