

Veron Chen (LKKAuto)

From: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Sent: Monday, 7 November 2022 3:00 PM
To: admin-d; assignments; SUR
Cc: Work Shop Estimate (SG)
Subject: LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

Importance: High

WITHOUT PREJUDICE

Dear Yan,

As we spoke earlier, kindly conduct the paper RI report urgently.

Thank you.

Best Regards,

Esther Cheah
Claims Department

Liberty Insurance Pte Ltd
51 Club Street #03-00 Liberty House
Singapore 069428
DID: (65) 63280794



From: Yan (LKK Auto) <admin-d@lkkauto.com>
Sent: Tuesday, October 4, 2022 5:11 PM
To: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>; assignments@lkkauto.com; 'SUR' <sur@lkkauto.com>
Cc: Work Shop Estimate (SG) <workshoestimate@libertyinsurance.com.sg>
Subject: {EXTERNAL} RE: Physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

Dear Esther,

Please be informed that according to our surveyor, the owner did not turn up at the prescribed time and place.

Kindly re-schedule the appointment and get back to us in advance.

Thank you.

Best Regards,

Yan | Admin

LKK Auto Consultants Pte Ltd

Phone: 6741-8434 | email: assignments@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Yan (LKK Auto) <admin-d@lkkauto.com>

Sent: Friday, 30 September 2022 1:27 PM

To: 'Cheah, Esther' <cheah.esther@libertyinsurance.com.sg>; assignments@lkkauto.com; 'SUR' <sur@lkkauto.com>

Cc: 'Work Shop Estimate (SG)' <workshopestimate@libertyinsurance.com.sg>

Subject: RE: Physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

Dear Esther,

Thank you for the assignment.

Appointment confirmed.

Best Regards,

Yan | Admin

LKK Auto Consultants Pte Ltd

Phone: 6741-8434 | email: assignments@lkkauto.com | fax: 6256-4315

Blk 51, Paya Ubi Industrial Park, Ubi Avenue 1, #02-25 | S(408933)

From: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>

Sent: Friday, 30 September 2022 12:16 PM

To: assignments@lkkauto.com; Yan (LKK Auto) <admin-d@lkkauto.com>; 'SUR' <sur@lkkauto.com>

Cc: Work Shop Estimate (SG) <workshopestimate@libertyinsurance.com.sg>

Subject: Physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

Importance: High

Dear LKK,

Due to parties are far apart on quantum of damages, we are unable to close the gap on COR, kindly proceed to conduct physical re-inspection as follows:

Date	:	4 October 2022 (Tuesday)
Time	:	11.30 a.m. (sharp)
Venue	:	Block 5035 Ang Mo Kio Industrial Park 2, #01-357, Singapore 569538
Contact	:	Mrs Oh @ 9762-9883

Please find the attached relevant documents and will send it in separate emails.

Meanwhile, **kindly confirm the physical RI as arranged.**

Thank you.

Best Regards,

Esther Cheah

Claims Department

Liberty Insurance Pte Ltd
51 Club Street #03-00 Liberty House
Singapore 069428
DID: (65) 63280794



From: Lim Igene <igene@axalt.sg>
Sent: Thursday, September 29, 2022 3:23 PM
To: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Cc: Claims_Admin (SG) <claims_admin@libertyinsurance.com.sg>
Subject: {EXTERNAL} RE: Request physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

OUR REF : ALL.T1.2200584.IG
YOUR REF : AVS22/1658

Dear Esther

Pending your confirmation on the downtime fees and costs, please note that we have made an arrangement for our client's vehicle **SLH 8740K** to be available for re-inspection on:

Date : 4 October 2022 (Tuesday)
Time : 11.30 a.m. (sharp)
Venue : Block 5035 Ang Mo Kio Industrial Park 2, #01-357, Singapore 569538
Contact : Mrs Oh @ 9762-9883

Kindly ensure that your appointed surveyor attends to the above without fail.

Please also let us have your written confirmation on the above arrangement as soon as possible.

Thanks & Best Regards,

IGENE

AXALT LAW LLC

Advocates & Solicitors
(UEN No. 202038023M)
66 Tannery Lane
#01-04j, Sindo Building
Singapore 347805
Tel : 6547 0082
Fax : 6547 0083
Email : igene@axalt.sg

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Thank you.

From: Lim Igene
Sent: Thursday, 29 September 2022 11:49 am
To: 'Cheah, Esther' <cheah.esther@libertyinsurance.com.sg>
Subject: RE: Request physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE
SAVE AS TO COSTS

OUR REF : ALL.T1.2200584.IG
YOUR REF : AVS22/1658

Dear Esther

Please revert on our proposal on downtime fees and costs.

Thanks & Best Regards,

IGENE

AXALT LAW LLC

Advocates & Solicitors
(UEN No. 202038023M)
66 Tannery Lane
#01-04i, Sindo Building
Singapore 347805
Tel : 6547 0082
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Thank you.

From: Lim Igene
Sent: Monday, 26 September 2022 12:46 pm
To: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Subject: RE: Request physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE
SAVE AS TO COSTS

OUR REF : ALL.T1.2200584.IG

YOUR REF : AVS22/1658

Dear Esther

Our clients have instructed us to claim a sum of \$120.00 as loss of rental of their vehicle for the day in the event that the re-inspection is carried out to be paid forthwith.

Furthermore, we are instructed to seek costs at \$200.00 for breach of Protocol. In compliance with clause 4.1 of the Practice Directions 2021, a copy of which is attached herein for your attention, your request for a re-inspection of our client's vehicle ought to be within 7 days from our letter of claim.

Please revert on this matter and we will take our client's instructions thereafter.

Thanks & Best Regards,

IGENE

AXALT LAW LLC

Advocates & Solicitors
(UEN No. 202038023M)
66 Tannery Lane
#01-04i, Sindo Building
Singapore 347805
Tel : 6547 0082
Fax : 6547 0083
Email : igene@axalt.sg

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Thank you.

From: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>

Sent: Friday, 23 September 2022 9:25 am

To: Lim Igene <igene@axalt.sg>

Subject: Request physical RI- LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE

Dear Igene,

We refer to your email below.

As parties are far apart on quantum & to bridge the gap between parties offer, kindly arrange a **physical re-inspection** on your client's motor vehicle, SLH8740K.

Meanwhile, please advise us the date, time & the workshop location, at least 5 working days in advance.(Monday to Friday).

Thank you.

Best Regards,

Esther Cheah

Claims Department

Liberty Insurance Pte Ltd
51 Club Street #03-00 Liberty House
Singapore 069428
DID: (65) 63280794



From: Lim Igene <igene@axalt.sg>
Sent: Thursday, September 22, 2022 2:42 PM
To: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Cc: Claims_Admin (SG) <claims_admin@libertyinsurance.com.sg>
Subject: {EXTERNAL} RE: Reoffer - LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE
SAVE AS TO COSTS

OUR REF : ALL.T1.2200584.IG
YOUR REF : AVS22/1658

Dear Esther

We regret to inform that our client is not prepared to accept your revised global offer.

Our instructions are still to settle matter only as follows:

(1) Cost of repairs	\$11,000.00
(2) Loss of Use for 10 days x \$120.00 per day	\$ 1,200.00
(3) PRS – Loss of Use for 2 days 21/06/2022)	\$ 240.00 (PRS arranged on 20/06/2022. PRS conducted on 21/06/2022)
(4) Survey fees	\$ 847.00
(5) GIA/LTA	\$ 38.49
(6) Costs & Incidentals	\$ 1,050.00

	\$14,375.49
	=====

Since we have given you our notice of intention to proceed with the issuance of an Originating Claim against your insured, in the event that you are not agreeable to our proposal, do let us know if you are appointing solicitors to accept service of the Originating Claim on your insured's behalf.

Thanks & Best Regards,

IGENE

AXALT LAW LLC

Advocates & Solicitors
(UEN No. 202038023M)
66 Tannery Lane
#01-04i, Sindo Building
Singapore 347805
Tel : 6547 0082
Fax : 6547 0083
Email : igene@axalt.sg

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Thank you.

From: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Sent: Wednesday, 21 September 2022 6:15 pm
To: Lim Igene <igene@axalt.sg>
Subject: Reoffer - LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE
SAVE AS TO COSTS

Dear Sir/Madam,

We refer to your email below.

Strictly without admission of liability and solely for the sake of amicable settlement, we revised our offer at \$8,450.00 for settlement.

Please advise your client's acceptance and let us have your respond for follow up.

Thank you.

Best Regards,

Esther Cheah
Claims Department

Liberty Insurance Pte Ltd
51 Club Street #03-00 Liberty House
Singapore 069428
DID: (65) 63280794



From: Lim Igene <igene@axalt.sg>

Sent: Wednesday, September 14, 2022 2:49 PM

To: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>

Subject: {EXTERNAL} RE: Offer - LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE

OUR REF : ALL.T1.2200584.IG

Dear Esther

We regret to inform that our client is not prepared to accept your offer.

We are instructed to propose settlement as follows:

(1) Cost of repairs	\$11,000.00
(2) Loss of Use for 10 days x \$120.00 per day	\$ 1,200.00
(3) PRS – Loss of Use for 2 days 21/06/2022)	\$ 240.00 (PRS arranged on 20/06/2022. PRS conducted on
(4) Survey fees	\$ 847.00
(5) GIA/LTA	\$ 38.49
(6) Costs & Incidentals	\$ 1,050.00

	\$14,375.49
	=====

In the event that you are not inclined to go along with our suggestion, please let us know if you are appointing solicitors to accept service of the Originating Claim should there be no settlement and/agreement on our client's proposal.

Thanks & Best Regards,

IGENE

AXALT LAW LLC

Advocates & Solicitors
(UEN No. 202038023M)

66 Tannery Lane
#01-04j, Sindo Building
Singapore 347805

Tel : 6547 0082

Fax : 6547 0083

Email : igene@axalt.sg

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Thank you.

From: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>

Sent: Tuesday, 13 September 2022 4:52 pm

To: Lim Igene <igene@axalt.sg>

Subject: Offer - LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE

SAVE AS TO COSTS

Dear Sir/Madam,

Strictly without admission of liability and solely for the sake of amicable settlement, we offer as follows:

COR	\$5,618.33
LOU	\$600.00
SR	\$847.00
GIA/LTA	\$38.49
Costs	\$400.00
Total	\$7,503.82

Please advise your client's acceptance and please respond for follow up.

Thank you.

Best Regards,

Esther Cheah

Claims Department

Liberty Insurance Pte Ltd
51 Club Street #03-00 Liberty House
Singapore 069428
DID: (65) 63280794



From: Lim Igene <igene@axalt.sg>
Sent: Monday, September 5, 2022 12:21 PM
To: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Subject: {EXTERNAL} RE: ACK LOD - LIB ref: AVS22/1658 RE: ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

OUR REF : ALL.T1.2200584.IG
YOUR REF : SNC 4609L

Dear Esther

We have sent you our client's letter of claim on 13 July 2022.

We trust you would have completed your investigation by now.

Please let us have your offer for our client's consideration.

Thanks & Best Regards,

IGENE

AXALT LAW LLC

Advocates & Solicitors

(UEN No. 202038023M)
66 Tannery Lane
#01-04i, Sindo Building
Singapore 347805
Tel : 6547 0082
Fax : 6547 0083
Email : igene@axalt.sg

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Thank you.

From: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>
Sent: Wednesday, 13 July 2022 5:38 pm
To: Lim Igene <igene@axalt.sg>
Subject: ACK LOD - LIB ref: AVS22/1658 RE:ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE

Dear Sir/Madam,

We acknowledge receipt of your letter dated 13/7/22 together with supporting documents.

We reserve our rights for your client's vehicle to be re-inspected if necessary.

We will revert in due course.

Thank you.

Best Regards,

Esther Cheah
Claims Department

Liberty Insurance Pte Ltd
51 Club Street #03-00 Liberty House
Singapore 069428
DID: (65) 63280794



From: Lim Igene <igene@axalt.sg>
Sent: Wednesday, July 13, 2022 12:53 PM
To: Claims_Admin (SG) <claims_admin@libertyinsurance.com.sg>
Cc: Cheah, Esther <cheah.esther@libertyinsurance.com.sg>; Lim, Stewart <lim.stewart@libertyinsurance.com.sg>

Subject: {EXTERNAL} LETTER OF DEMAND | ACCIDENT ON 18 JUNE 2022 INVOLVING VEHICLE NOS. SLH 8740K, SNC 4609L AND SMB 1312D

WITHOUT PREJUDICE

OUR REF : ALL.T1.2200584.IG
YOUR REF : SNC 4609L

Dear Sir

We refer to the captioned matter.

Please find attached a copy of the LETTER OF DEMAND and all documents, except for coloured surveyor's photos which will attach in a separate email in support of our client's claim.

Thanks & Best Regards,

IGENE

(For and on behalf of Miss Tan May Yee)

AXALT LAW LLC

Advocates & Solicitors
(UEN No. 202038023M)
66 Tannery Lane
#01-04i, Sindo Building
Singapore 347805
Tel : 6547 0082
Fax : 6547 0083
Email : igene@axalt.sg

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