

ISLAND LAW PRACTICE LLC

Advocates & Solicitors

(UEN No. 200918269D)

(GST Reg No. 200918269D)

KIRPAL SINGH SHARMA
ANTHONY CHEY

101 Upper Cross Street
#04-04 People's Park Centre
Singapore 058357
Tel: (65) 6221 3211
Fax: (65) 6225 3210
Email: christine@islandlaw.com.sg

Our Ref : KS.0814.22.CS(ST)
Your Ref : Your vehicle – SMM 1048J

Date: 7 SEP 2022

WITHOUT PREJUDICE

AXA INSURANCE PTE LTD
8 SHENTON WAY
#27-01 AXA TOWER
SINGAPORE 068811
ATTENTION: MOTOR CLAIMS DEPARTMENT

BY EMAIL
(cst@axa.com.sg/
motor.doc@axa.com.sg)

CHAN YING GIT (CHEN YINGJIE)
28 ALEXANDRA VIEW
#26-05
SINGAPORE 158744

BY C.O.P.
(LESS ENCLOSURES)

Dear Sirs,

**INJURED-CLAIMANT: GALVIN NG CHEN KIAT (NRIC NO. SXXXX251F) (RIDER)
ACCIDENT INVOLVING FBR 7685J & SMM 1048J ALONG LOWER DELTA ROAD ON 17
FEBRUARY 2022 AT 1130 HRS**

We are instructed by the abovenamed Claimant, who is our client, to claim damages against you in connection with a road traffic accident on **17th February 2022 at about 1130 hours along Lower Delta Road** involving our client who was the rider of vehicle bearing registration number **FBR 7685J** and motor vehicle bearing registration number **SMM 1048J** driven by you/your authorized driver.

We are instructed that the accident was caused by the/your negligence of your authorized driver. As a result of the accident, our client suffered personal injuries. His injuries are set out in the medical report annexed to this letter. Our client has been put to loss and expenses, particulars of which are as follows:

Nature of injuries:-

1. Tenderness over right anterior talofibular ligament (ATFL) and peroneal tendons
2. Complete and permanent tear of ATFL which attaches to avulsed bony fragment. Posterior talofibular ligament, calcaneo fibular ligament sprains
 - Posterior inferior tibiofibular ligament sprain
 - Peroneal brevis tendinosis
 - Subacute/chronic non-union navicular fracture
 - Early degenerative changes at the posterior subtalar joint
 - May experience right ankle pain and/or instability in the long run and may affect his daily life and work
 - 5% permanent incapacity
 - May require future surgical intervention

3. Multiple Abrasions

- Left shoulder
- Left little finger
- Left lateral hip
- Left knee
- Left little toe
- Right shin
- Right heel and right dorsum of the foot

1.	General Damages	S\$	25,000.00
2.	Medical Expenses	S\$	2,628.09
3.	Transport Expenses	S\$	150.00
4.	Loss of Earning Capacity/Loss of Future Earnings (to be assessed)	S\$	30,000.00
5.	Cost of Future Medical Expenses	S\$	To be assessed
6.	Cost of repairs	S\$	7,704.00
7.	Loss of use (11 days x \$50)	S\$	550.00
8.	Loss of income (30 days)	S\$	1,832.70
9.	Medical Report Fees	S\$	320.00
10.	LTA Search	S\$	7.49
11.	Public Trustee fee	S\$	225.00
12.	Costs and GST	S\$	5,350.00
13.	Incidentals and GST	S\$	107.00
		S\$	73,874.28

A copy each of the following supporting documents is enclosed:

- 1) 23.08.22 Specialist Medical Report (& invoice) from Singapore General Hospital;
- 2) 16.03.22 Medical Report (& invoice) from Singapore General Hospital;
- 3) Various Medical bills and medical certificate;
- 4) 28.02.22 Our Client's GIA Report;
- 5) 11.07.22 Invoice from EQBH Pte Ltd;
- 6) 11.07.22 Invoice and survey report from Advanced Automotive Consultancy Pte Ltd;
- 7) ----- Our Client's Grab and Foodpanda Statements for the period 29.11.21-20.02.22;
- 8) ----- LTA Search;

In compliance with the Pre-action Protocol for Personal Injury Claims and Non-Injury Motor Accident Claims at Appendix B; State Courts Practice Directions 2021, we propose using Dr. Xia Zhan (Associate Consultant Orthopaedic Surgeon) of Singapore General Hospital as the single-joint-expert.

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 acknowledgment of receipt of this letter within **fourteen (14) days** of your receipt of this letter. Please also inform us, within 14 days of your acknowledgement of receipt of this letter, whether you have any objections to our proposed medical expert or whether you wish to propose other medical experts.

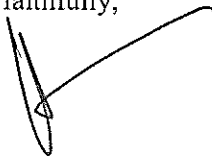
If you wish to have our client examined by your own medical expert, this should be stated in your acknowledgment of receipt. Please also advise within 14 days of the acknowledgment of receipt, where and when examination of our client is to take place so that we may arrange for him to attend.

Should you fail to acknowledge receipt of this letter within 14 days, our client may 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 also 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.

Thank you.

Yours faithfully,

A handwritten signature in black ink, consisting of a stylized 'V' shape with a horizontal line extending to the right.

ISLAND LAW PRACTICE LLC
Enc.