



# 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 : info@juseq.com.sg

Our Ref: JEQ/220376/0622/SM-PI/cks

Your Ref: SKB 3399P

28 July 2022

**To: AXA INSURANCE SINGAPORE PTE LTD**  
8 Shenton Way #27-01  
AXA Tower  
Singapore 068811

**BY EMAIL**  
**WITHOUT PREJUDICE**

**Cc: CHOW KING LOONG**  
58 Carlsbrooke Grove  
Singapore 558834

**BY EMAIL**  
**WITHOUT PREJUDICE**

Dear Sirs

**CLAIMANT: MOHAMED NOR ASRAFF BIN MOHAMED**

**PROPERTY DAMAGE AND PERSONAL INJURY CLAIMS ARISING FROM ACCIDENT INVOLVING VEHICLES FY 129K & SKB 3399P ALONG BISHAN ROAD ON 11 JUNE 2022**

We are instructed by the abovenamed to claim damages against you in connection with an accident on 11<sup>th</sup> June 2022 along Bishan Road involving vehicle registration numbers FY 129K and SKB 3399P driven by you at the material time of the accident. Our client was the owner and rider of FY 129K 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 SKB 3399P.

As a result of the accident, FY 129K 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

a) Transport expenses	\$	30.00
b) Medical / consultation expenses	\$	128.00
c) Cost of repairs (lump sum)	\$	3,000.00
d) Loss of use for 7 days (5+2 days PRI) @ \$50.00 per day	\$	350.00

## B. General Damages

### 1) Pain and suffering

#### Brief description of injuries:

a) 1.5cm x 1.5cm abrasion on lateral side of left knee	\$	1,500.00
b) 0.5cm x 0.5cm abrasion on right ankle	\$	1,500.00
c) Tenderness over the left anterior superior iliac supine (ASIS) body prominence with abrasion over the left shoulder	\$	1,500.00
d) Multiple abrasions over left shoulder and knee	\$	2,000.00

## C. Disbursements

a) Medical report fee	\$	90.00
b) Search & report fees / LTA / TP / GIA	\$	84.49
c) Automobile survey fee	\$	522.00
d) PT's fee	\$	225.00

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

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

- Two (2) traffic police reports lodged by our client & the driver of SKB 3399P;
- Two (2) GIA reports with sketch plan lodged by our client & the driver of SKB 3399P;
- First information report from Traffic Police;
- Copy of letter from Traffic Police;
- LTA search result with receipt;
- Medical report and receipt from Tan Tock Seng Hospital;

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- g) Tax invoice for medical expenses from Tan Tock Seng Hospital;
- h) Medical certificate issued in respect of our client;
- i) Invoice from Speedy Motor Cycle Service Centre;
- j) Survey report and invoice from Lee Appraisal Services;
- k) Receipt / tax invoice for TP / GIA search & report fees;
- l) Copy of email from JusEquity Law Corporation to AXA Insurance Singapore Pte Ltd; and
- m) Sixty-two (62) colour photographs depicting the damages sustained by FY 129K.

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. Benjamin Lim Jia Han from Tan Tock Seng Hospital.

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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