

AP LAW PRACTICE LLC

(UEN No. 201939937D)

(GST Registration No. 201939937D)

151 Chin Swee Road
#10-03/05 Manhattan House
Singapore 169876Tel: +65 6955 8899
Fax: +65 6900 9899
WhatsApp: +65-9171-4767
Email: caroline@apl.com.sg**We do not accept service of Court documents by fax.**

Our ref: AP/2022/005308

Your ref: GBF8883K

Date: 07 February 2023

Secretary in charge: Caroline

Secretary's email: caroline@apl.com.sg

ZHANG YIMENG227 Upper Paya Lebar Road
06-16
Singapore 533872**By POST
(Without attachments)****Lonpac Insurance BHD
Insurer of GBF8883K**300, Beach Road #17-04/07,
The Concourse,
Singapore 199555**By EMAIL
(With attachments)**

Dear Sirs,

WITHOUT PREJUDICE**CLAIM ARISING FROM A ROAD TRAFFIC ACCIDENT ON 09 DECEMBER 2022 AT ABOUT 1255 HRS INVOLVING MOTOR VEHICLES NO(S). SLS1900D AND GBF8883K ALONG 531 UPPER CROSS STREET MULTI STOREY CARPARK**We act for **LIM HAN YAW, DOMINIC**, owner of **SLS1900D**.We are instructed by our client to claim damages against you/your insured in connection to the above-mentioned road traffic accident between our client and your/your insured's vehicle **GBF8883K**.

We are instructed that the above-mentioned road traffic accident was caused by your/your insured's negligence / the negligence of your authorised driver in the driving, management and/or control of your/your insured's vehicle.

As a result of the abovementioned road traffic accident, our clients' vehicle was damaged and our clients has been put to loss and expense, particular of which are as follows:

COSTS OF REPAIR	\$ 14,700.00
LOSS OF USE	\$ 1,320.00
- Pre-repair	\$360.00
(03 days including intervening weekend @ \$120.00 per day)	
- Loss of use during repair works	\$960.00
(08 days including intervening weekend @ \$120.00 per day)	
Our Legal Costs with GST (At this stage)	\$ 1,620.00
Disbursements (To-date)	\$ 1,136.49
1. Survey Report Fees	\$ 936.00
2. GIA / LTA searches fee	\$ 38.49
3. Other Incidentals with GST	\$ 162.00
Total	\$ <u>18,776.49</u>

We enclose herewith the following supporting documents for your attention:

- a. Our client's Singapore Accident Statement;
- b. Copy of repair bill from our client's workshop;
- c. Copy of our client's surveyor report;
- d. Copy of the survey report tax invoice;
- e. Copies of receipts for GIA / LTA searches;

In compliance with the pre-action protocol under the State Courts' Practice Direction 37, we had notified your insurer of the above-mentioned road traffic accident and to the best of our knowledge, your insurer had arranged for the pre-repair inspection of our client's vehicle.

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 to us within fourteen (14) days of your receipt of this letter, failing which, our client will have no alternative but to commence proceedings against you without further notice to you or your insurer

Please also note that if you a counterclaim against our client arising out of the above-mentioned accident, you are required to send to us a letter giving full particulars of the counterclaim together with all relevant supporting documents within eight (8) weeks of your receipt of this letter

*Should you fail to acknowledge receipt of this letter within fourteen (14) days, our client may commence Court proceedings against you without further notice to you or your insurer. For the avoidance of any doubt, **this letter serves as notice under Section 9(3) of the Motor Vehicles (Third Party Risks and Compensation) Act (Cap. 189)** of our client's intention to commence proceedings against you and/or your authorised driver.*

Yours faithfully,



A P LAW PRACTICE LLC

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SINGAPORE ACCIDENT STATEMENT

IMPORTANT NOTICE

1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Actual Driver
3. Information provided must be as truthful and accurate as possible. Any wilful misrepresentation or withholding of material facts may allow insurance companies to repudiate policy liability.
4. The issue and acceptance of this Form by insurance companies is not an admission of policy liability on the part of the insurance companies.
5. **Any false reporting may be referred to the Police for investigation.**
6. This report will be forwarded by the insurers of the GIA Records Management Centre established by the General Insurance Association of Singapore (GIA) for archiving and that copies of this report will, for a fee, be made available upon application by interested parties.
7. By the lodgement of this report to the insurers, you hereby consent to the archiving of this report at the centre and to copies of the report being made available aforesaid.

ACCIDENT STATEMENT

Date of Submission 12/12/2022 19:46 (SGT)
Reported by Both
Date of Accident 09/12/2022 12:55 (SGT)
Exact Location of Accident 531 Upper Cross St, Singapore 050531
Additional Location Information Mutistorage Carpark
Country/State of Loss Singapore

DETAILS OF OWN VEHICLE

Vehicle Registration Number SLS1900D

INSURED/POLICYHOLDER

Is company? No
Name Of Registered Owner Lim Han Yaw, Dominic
NRIC No S8515092H
Email Address domlhy@hotmail.com
Mobile Phone No (Phone) +65-82680777
Alternative Phone No -

VEHICLE PARTICULARS

Manufacturer Maserati
Model Quattroporte
Variant GRANLUSSO
Exact purpose for which vehicle was being used at time of accident Private use
Are you claiming under your own insurance policy for repair to your vehicle? No - Claiming third party
Vehicle Category Private car
Transmission Auto
CC 2979

INSURANCE COMPANY

Name of Insurance Company Liberty Insurance Pte Ltd
Policy Number / Cover Note Number SD22V03768/VPS/R0

DRIVER

Name of Driver Lim Han Yaw, Dominic
NRIC No S8515092H
Date Of Birth 13/05/1985
Occupation Outdoor

Date Of Driving Pass	18/10/2012
Driving experience	10 YEARS AND 2 MONTHS
Gender	Male
Mobile Number	(Phone) +65-82680777
Alt. Phone Number	-
Email Address	domlhy@hotmail.com
Address	Blk 156 Bedok South Avenue 3
Address complement	#04-593 Singapore
Postcode	460156
Is the driver the policyholder?	Yes
If No, Relationship of the Driver with the Insured	-
Does Driver Own Other Vehicles?	No
Vehicle Registration Number of Other Vehicle Owned by Driver	-
Insurance Company of Other Vehicle Owned by Driver	-

GENERAL INFORMATION OF THE ACCIDENT

Type of Accident	Collision - Major/Minor Rd
Weather Conditions	Clear
Road Surface	Dry

OTHER INFORMATION

Was any foreign vehicle involved in the accident?	No
Number of vehicles involved in the accident	2
Was anybody injured in the Accident?	No
Was any injured conveyed to hospital by ambulance?	-
Was any other vehicle or property damaged?	Yes
Number of Passengers (Including Driver)	2
Has the driver been approached by unknown person(s) soliciting/offering accident claims assistance?	No
Translator's name	-
Translator's ID	-
Translator's phone number	-
Translator's email	-
Original language used in the statement	-

PASSENGER 1

Name	Catherine Wee Zi Ting
Gender	Female

DETAILS OF POLICE ACTION

Was the accident reported to the police?	No
Was notice of intended Prosecution given?	No
If yes, against whom?	-

CIRCUMSTANCES OF ACCIDENT

Refer to sketch plan.

ATTACHMENT(S)

Are accident photos available for attachment?	Yes
Was there any video captured by Car Camera?	Yes

DETAILS OF OTHER VEHICLE PROPERTY 1

Vehicle Registration Number	GBF8883K
Vehicle Manufacturer	-
Vehicle Model	-
Vehicle Variant	-

Vehicle Colour	-
Vehicle Category	Commercial vehicle
Name of Driver	Zhang YiMeng
NRIC No	S8378346Z
Contact Number	-
Address	-
Address complement	-
Postcode	-
Insurance Company Name	-
Nature Of Damage	-
Details of property damaged in accident	-
No. Of Passenger (Including Driver)	-

SKETCH PLAN

IMPORTANT NOTICE

1. Please report correctly the details of the accident to speed up the claims process.
2. This Form must be completed by the Policyholder and/or the Authorised Driver.
3. Information provided must be as truthful and accurate as possible. Any willful misrepresentation or withholding of material facts may allow insurance companies to repudiate policy liability.
4. The issue and acceptance of this Form by insurance companies is not an admission of policy liability on the part of the insurance companies.
5. Any false reporting may be referred to the Police for investigation.
6. The report will be forwarded by the insurers of the GIA Records Management Centre established by the General Insurance Association of Singapore (GIA) for archiving and that copies of this report will for a fee be made available upon application by interested parties.
7. By the lodgement of this report to the insurers, you hereby consent to the archiving of this report at the centre and to copies of the report being made available aforesaid.
8. **Consent under the Personal Data Protection Act (PDPA)**

I understand, acknowledge, agree and consent that:

(a) My insurer, my workshop and the General Insurance Association of Singapore ("GIA") may/are permitted to collect, use, disclose and/or process my personal data/personal information set out in this [form] and any other personal information provided by me or possessed by my insurer (collectively the "Personal Information") and disclose and transfer such Personal Information to all insurer(s) who have insured vehicle(s) involved in this accident (all insurer(s) who have insured vehicle(s) involved in this accident shall be collectively referred to as the "Insurers"), the insurers' lawyers/law firms, the Monetary Authority of Singapore and any relevant government agency/authority (such as the police), for the purpose(s) of:

(i) processing, handling and/or dealing with my claims including the settlement of the claims and any necessary investigations relating to the claims;

(ii) investigating the accident and/or my claims;

(iii) carrying out and/or dealing with my instructions or responding to any enquiries by me;

(iv) administering my claims (including the mailing of correspondence, statements, invoices, reports or notices to me, which could involve disclosure of certain personal data about me to bring about delivery of the same as well as on the external cover of envelopes/mail packages); and/or

(v) complying with applicable law in administering, processing, handling and/or dealing with my claims.

(collectively the "Purposes")

(b) all insurer(s) who have insured vehicle(s) involved in this accident and the insurers' lawyers/law firms, may/are permitted to collect, use, disclose and/or process my Personal Information for one or more of the above Purposes; and

(c) my Personal Information may/can be disclosed by any of the Insurers and/or GIA to their third party service providers or agents (including their lawyers/law firms), which may be sited outside of Singapore, for one or more of the above Purposes.

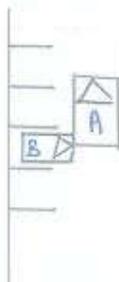
Policyholder's Signature / Date & Time

Driver's Signature (if driver is not the policyholder) / Date & Time

Law Yi Ting

Witnessed by Reporting Centre Personnel

Sketch Plan



(A) = SLS1900D

(B) = GBF8883K



















The Schedule

Liberty Insurance Pte Ltd

Registration no. 199602791D

51 Club Street

#03-00 Liberty House

Singapore 069428

Tel: (65) 6221 8611

website: <http://www.libertyinsurance.com.sg>

Class of Policy PRIVILEGE MOTOR POLICY (Comprehensive)		Policy No. SD22V03768 / VPS / R0										
The Insured LIM HAN YAW DOMINIC BLK 156 BEDOK SOUTH AVENUE 3 #04-593 SINGAPORE 460156 Profession or Business: Period of Insurance: From 13 MAR 2022 00:00 to 12 MAR 2023 23:59 both days inclusive Excess Section I - Insured only(Singapore) - \$312000 Section I - Insured only (Outside Singapore) - \$324000 Section I - Unnamed Drivers(Driver must have at least 36 months' driving experience, between the age of 25 and 59 years old & no claim record in the past 3 years - Singapore - \$316000 / Outside Singapore - \$332000 Windscreen Excess - \$1000 Hire Purchase Owner/Leasing Company MAYBANK SINGAPORE LTD Named Drivers: LIM HAN YAW DOMINIC		Replacing No. Account No. A1924 Registration No. SL81900D Make / Model MASERATI QUATTROPORTE GRANLUSGO Type of Body SALOON Capacity/Tonnage 3979 C.C Seating capacity including driver 5 Year of Manufacture/Registration 2017/2017 Engine No. 367727 Chassis No. CAMX256C001258019 Sum Insured Market value at the time of loss Extra Coverage <table border="1"> <tr> <td>NCD Protection</td> <td>SGD</td> <td>180.8</td> </tr> <tr> <td>Unlimited Windscreen</td> <td>SGD</td> <td>00.0</td> </tr> <tr> <td>Restricted Age Condition (Unnamed Drivers)</td> <td>SGD</td> <td>00.0</td> </tr> </table>		NCD Protection	SGD	180.8	Unlimited Windscreen	SGD	00.0	Restricted Age Condition (Unnamed Drivers)	SGD	00.0
NCD Protection	SGD	180.8										
Unlimited Windscreen	SGD	00.0										
Restricted Age Condition (Unnamed Drivers)	SGD	00.0										
Subject to the following operative endorsements attached: V0001 V0010 V0012 V0013 V0065 V0097 V0236 V0252 V0252A V0261 Z011												
The Policy's Premium		(SINGAPORE DOLLAR)										
Basic Premium	NCB	Fleet / Other Disc	Good Driver Discount									
3,806.70	1,903.35 (50.00%)	.00	95.17 (5.00%)									
Extra Premium	Sub Total	GST	Stamp duty									
180.82	1,989.00	138.23 (7.00)	NIL									
			Total Premium Payable									
			2,128.23									
This Schedule replaces any previous Schedule. This Schedule and Policy are to be read together as one contract. Person or classes of persons entitled to drive and limitations as to use, are as specified in the Certificate of Insurance issued in relation to this policy. PLSL / PLSL /20220317			Signed in SINGAPORE on 11 MAR 2022 for and on behalf of LIBERTY INSURANCE PTE LTD  Authorized Signature									



RECORD MANAGEMENT CENTRE

**GENERAL INSURANCE ASSOCIATION OF SINGAPORE
RECORDS MANAGEMENT CENTRE**

9 Temasek Boulevard, Suntec City Tower Two #42-01B
Singapore 038989

E-mail: gears-support@shift-technology.com

GST Registration: M400017735

TAX INVOICE

Date of Request: 03/01/2023

Your Ref No: 005308

Dear Sir/Madam,

Date of Accident: 09/12/2022 00:00 (SGT)

Vehicle No: SLS1900D

Place of Accident: Singapore

With reference to your application for the accident report, we have attached the following accident report as requested:

DOCUMENTS	ACCIDENT LOCATION	PER DOC (\$)	QTY	AMOUNT (\$)
GBF8883K	Singapore	(31.00)	1	(28.70)
GST Amount				(2.30)
Total Amount Due (GST Inclusive)				(31.00)

The images provided to you are taken from the original reports forwarded to the centre by the members of the General Insurance Association of Singapore and we take no responsibility for their accuracy or contents and shall be under no liability whatsoever for any loss or damage arising out of or in connection with the reports or their images.

Thank you.

This is a computer generated document and requires no signature.



Thank you

You have successfully logged out.

Your last login date and time was 13 Dec 2022, 11:43:31.

To return to ONE.MOTORING, please click [here](#)

For security reasons, please **CLEAR YOUR CACHE** after each session.

Session Transaction History

S/No.	Asset Type	Asset ID	Transaction Type	Transaction Amount(\$\$)	Log Date/Time
1	Vehicle	GBF8883K	18.19 Enquire Veh Owner Info (Others) by Law Firm	7.49	13 Dec 2022 / 11:44:20

Trident Auto Service Centre Pte Ltd

8 Kaki Bukit Ave 4

#02-42 Premier @ Kaki Bukit,
Singapore 415875

Email : tridentauto.claims@gmail.com

INVOICE

Owner : Lim Han Yaw, Dominic
Address : C/o: Trident Auto Service Centre Pte Ltd
8 Kaki Bukit Ave 4
#02-42 Premier @ Kaki Bukit, Singapore 415875

Date : 13-Jan-23

Reg No. : SLS 1900 D
Model : Maserati Quattroporte Granlusso

D.O.A : 09-Dec-22

ITEM NO	DESCRIPTION		U.PRICE SGD	AMOUNT SGD
1	LUMP SUM REPAIR COST AS PER SURVEYOR REPORT RECOMMENDATION		SGD 14,700.00	SGD 14,700.00
Grand Total Amount:				SGD 14,700.00

CL APPRAISER PTE LTD

Blk 416 Pasir Ris Dr 6 #08-235, Singapore 510416
Email: clappraiser@yahoo.com Hp: 9068 8689 Fax: 6452 9783
Reg No: 201000228E

INVOICE

Lim Han Yaw, Dominic
C/o: Trident Auto Service Centre Pte Ltd
8 Kaki Bukit Ave 4
#02-42 Premier @ Kaki Bukit, Singapore 415875

Invoice No. : CL/230032

Ref No. : TRI/01/2301/TP

Date : 13 January 2023

DESCRIPTION	AMOUNT
OUR SERVICE FEE CHARGES:	
<ul style="list-style-type: none">SURVEY INSPECTION FOR VEHICLE NO. <u>SLS 1900 D</u>RESURVEY INSPECTIONDIGITAL PHOTOGRAPHS SERVICES (INCLUSIVE OF STORAGE AND SUBMISSION OF DIGITAL PHOTOGRAPHS)TRANSPORTATION	
GRAND TOTAL	S\$ 936.00

E & O. E

Notes / Payment method:

All cheque payment should be "Crossed" and made payable to "CL APPRAISER PTE LTD"

Bank Transfer -

Account Name : CL APPRAISER PTE LTD

Account Number : 588041152001

Bank : OCBC

We shall be grateful if you could forward our payment at your early convenience.



CL Appraiser Pte Ltd

CL APPRAISER PTE LTD

Blk 416 Pasir Ris Dr 6 #08-235, Singapore 510416

Email: clappraiser@yahoo.com Hp: 9068 8689 Fax: 6452 9783

Reg No: 201000228E

VEHICLE INSPECTION REPORT

To: Lim Han Yaw, Dominic
C/o: Trident Auto Service Centre Pte Ltd
8 Kaki Bukit Ave 4
#02-42 Premier @ Kaki Bukit, Singapore 415875

Date : 13 January 2023
Our ref : TRI/01/2301/TP

Accident Date : 9 December 2022
Inspection Date : 3 January 2023
Repairer Name : Trident Auto Service Centre Pte Ltd
8 Kaki Bukit Ave 4
#02-42 Premier @ Kaki Bukit, Singapore 415875

Type of Survey : Third Party

PARTICULARS OF VEHICLE

Registration No : SLS 1900 D
Make / Model : Maserati Quattroporte Granlusso
Chassis No : ZAMXP56C001258019
Engine No : 367727
Year / Capacity : 2017 / 2979 cc
Colour : Silver
Mileage : 121026

CONDITION OF TYRES

	Make	Size	Thread Balance	Rim
Front Nearside	Pirelli	245/40 R20	5 mm	Sport
Front Offside	Pirelli	245/40 R20	5 mm	Sport
Rear Nearside	Pirelli	245/40 R20	5 mm	Sport
Rear Offside	Pirelli	245/40 R20	5 mm	Sport

GENERAL DESCRIPTION OF DAMAGE VEHICLE

The impact damages sustained on the vehicle at the time of inspection is on the n/s portion.
(Details refer to the photographs attached)

Enclosed number of photographs: 36 copies

REMARKS

This inspection was conducted entirely on a "**WITHOUT PREJUDICE**" basis and we have not given authorization and instruction to the repairer to proceed with the repair.

RECOMMENDATIONS

We have thoroughly inspected each and every item on the estimate against the physical damage found on the vehicle and we have listed the breakdown of our finding and our recommendation.

The repairer has agreed to undertake the job at a **Lump Sum of \$14,700.00** on a contractual basis.

Under normal circumstances, the repair period would be about 6 (Six) working days.

SCL APPRAISER PTE LTD

Vehicle Registration No.: SLS 1900 D

Our Ref No.:

TRI/01/2301/TP

Qty	Description	Conditions	Repairer's Estimate	Revised Amount
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SPARE PARTS - LIST ITEMS

1	Rear windscreen seal	Intact	\$ 427.50	X nn
1	Rear bumper	Damage	\$ 3,125.00	\$ 3,125.00 ✓
1	Rear bumper clip (1 set)	Necessary	\$ 150.00	\$ 150.00 ✓
1	Rear bumper side retainer	Necessary	\$ 100.00	\$ 100.00 ✓
1	Rear n/s door	Damage	\$ 4,125.00	\$ 4,125.00 X R
1	Rear n/s door rubber	Necessary	\$ 1,585.00	\$ 1,585.00 X nn
1	N/s rocker panel side skirt	Damage	\$ 2,375.00	\$ 2,375.00 X R
1	Rear n/s fender	Repair	\$ 9,000.00	
1	Rear wheel rim	Damage	\$ 2,625.00	\$ 2,625.00 1000 ✓ nett
			\$ 23,512.50	\$ 14,085.00
			Less 10%	\$ 1,408.50
Total Cost - List Items			\$ 21,161.25	\$ 12,676.50
			3125 -10% 2812.50	nett -1000

SPECIAL NETT ITEMS

1	Rear windscreen sealant	Intact	\$ 80.00	X nn
1	"AX" body sticker wrapping <small>Carousell find similar type (upload to VIEWS)</small>	Necessary	\$ 3,200.00	\$ 3,200.00 800
1	Rear tyre (Depreciation) <small>4 panel (rear LH door, Rear LH fender, LH skirt and rear bumper) \$200 panel</small>	Damage	\$ 500.00	\$ 250.00 X nn
Total Cost - Special Nett items			\$ 3,780.00	\$ 3,450.00

800

Total cost of parts

	\$ 24,941.25	\$ 16,126.50
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SCL APPRAISER PTE LTD

Vehicle Registration No.: SLS 1900 D

Our Ref No.:

TRI/01/2301/TP

S/No	Description	Repairer's Estimate	Revised Amount
Total cost of parts c/f		\$ 24,941.25	\$ 16,126.50
 <u>LABOUR</u>			
1	To remove, refit, replaced damaged lamps and check up rear electrical wiring	\$ 80.00	\$ 50.00 ✓
2	To remove and refit inner garnishes, inner trim to assist repair.	\$ 150.00	\$ 120.00 80
3	To conduct wheel alignment.	\$ 180.00	\$ 180.00 80
4	To apply undercoating on repaired and replaced panel.	\$ 100.00	\$ 60.00 30
5	To provide labour charges, workmanship to dismantle above damaged parts, repair including cut and weld ; re-align body structure and damaged consistent to the accident.	\$ 1,400.00	\$ 1,000.00 600
6	To respray painting include polishing and waxing on the changed body parts, repaired portions where consistent to the accident.	\$ 1,200.00	\$ 880.00 800
		1640	
GRAND TOTAL		\$ 28,051.25	\$ 18,416.50

5 days

Vehicle Registration No.: SLS 1900 D

Our Ref No.:

TRI/01/2301/TP

The repairer has agreed to undertake the repair under a Lump Sum Basis. We have further adjusted the amount to a **Lump Sum Repair Contract of : \$ 14,700.00**

By accepting to carry out the repairs on a contract lump sum basis, the repairer has the discretion to replace the damaged parts with used, reconditioned or new parts, or to repair it to a roadworthy condition.

Note: The revised estimate was made from a visual inspection. Should there be any discrepancy or unseen damage / item in this survey, kindly notified the company within seven (7) from the date hereof. Otherwise, the revised amount shall be deem to be vaild.

Disclaimer

The rates and assessment of damages as stated in this report is to be used solely for legal proceedings in relation to the surveyed vehicle and the accident in which the surveyed vehicle was involved in. The rates and assessment of damages must not be used in any circumstances for comparison with other vehicle and/or other accident in other legal proceedings.

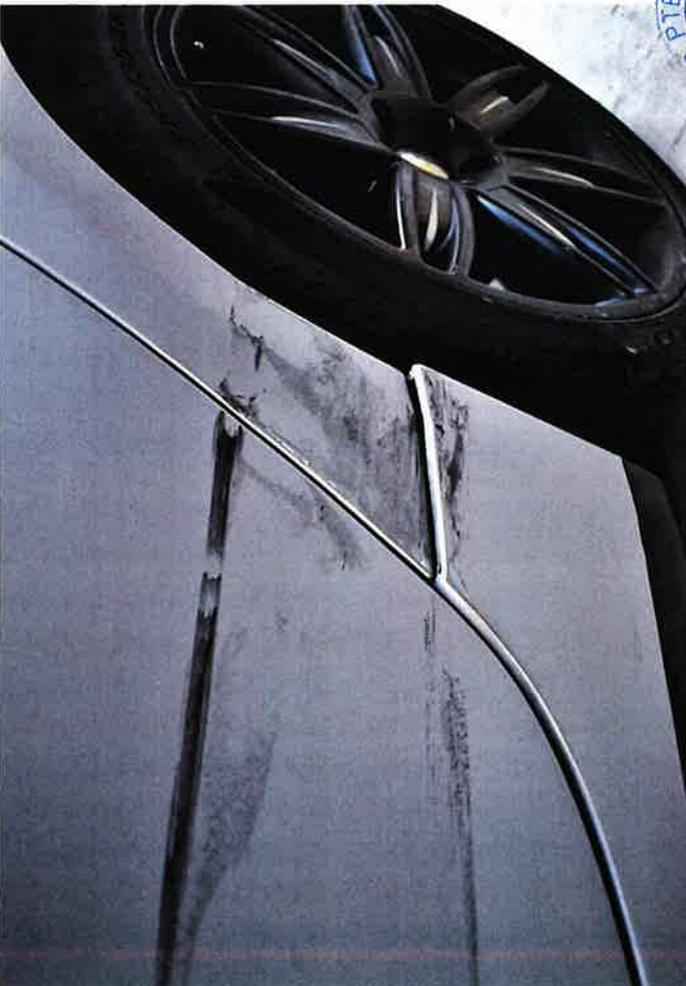
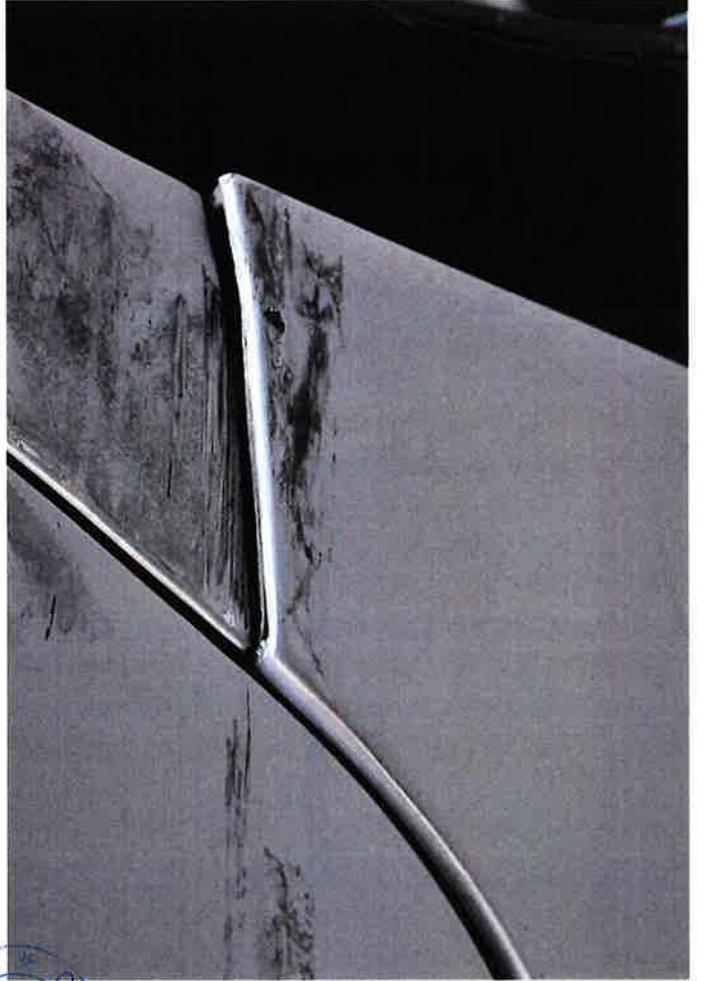
C L APPRAISER PTE LTD

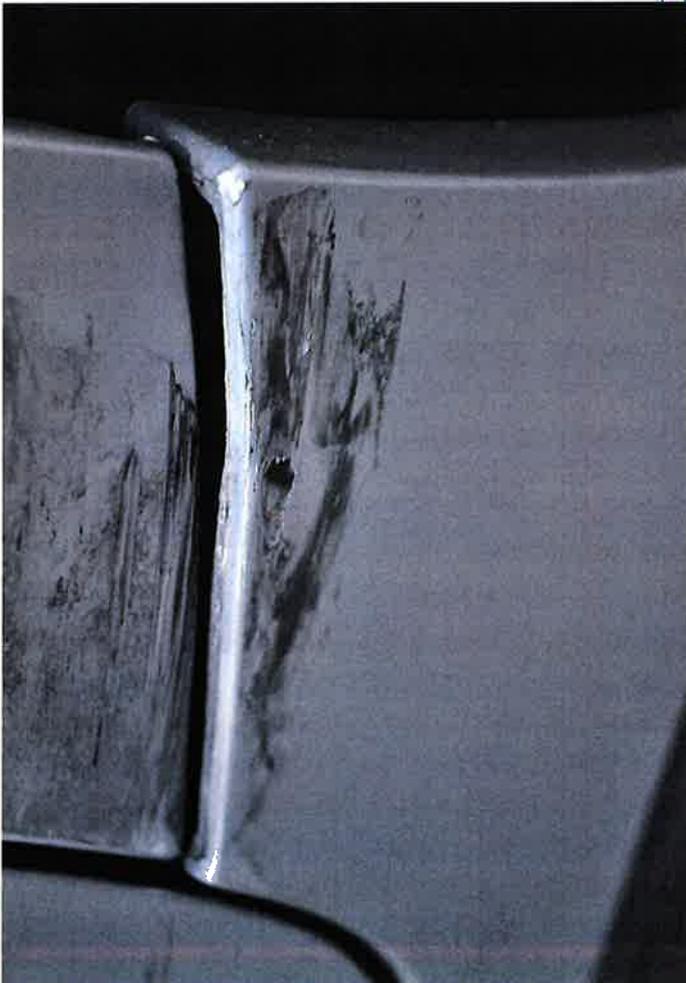


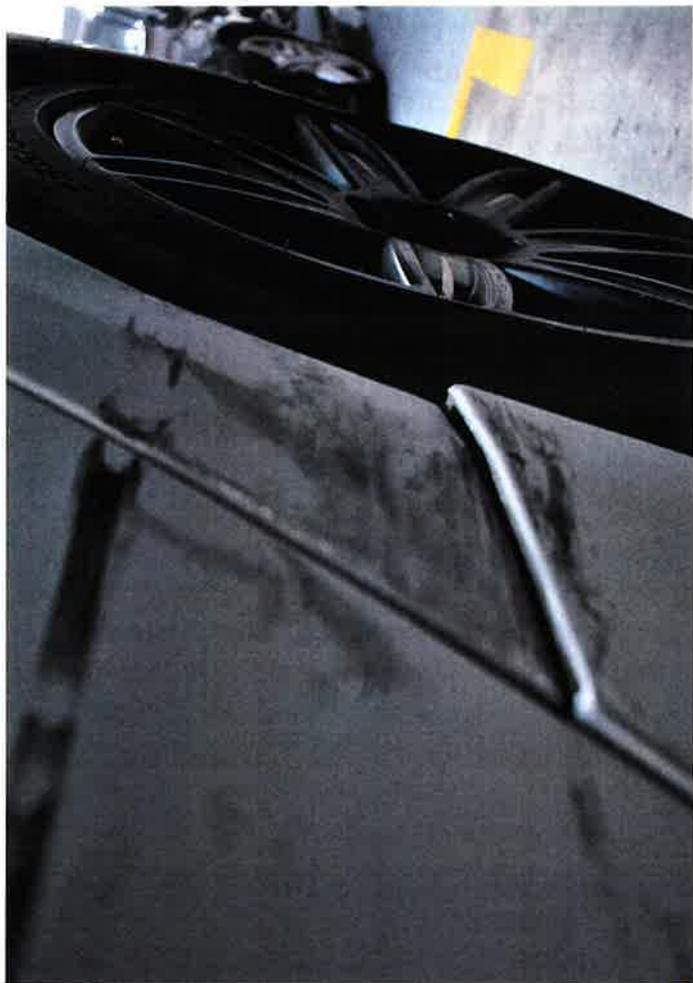
Cheong K. H
Automotive Appraiser



STATE OF TEXAS
INSURANCE











SEPT 2013



