

IN THE STATE COURTS OF THE REPUBLIC OF SINGAPORE

MC SUIT NO. 8116 OF 2021

Between

LEE HEUP SOON
(NRIC NO. S1261857C)

... Plaintiff(s)

And

LOH WAI FONG
(MALAYSIA PASSPORT NO. A52656605)

... Defendant(s)

AFFIDAVIT OF EVIDENCE-IN-CHIEF

I, **LEE HEUP SOON** (NRIC NO. S1261857C) of Block 656 Senja Road #11-264, Singapore 670656, a Jewellery worker by occupation, do solemnly and sincerely affirm and say as follows:-

1. I am the Plaintiff named herein and am affirming this affidavit of evidence in chief pursuant to Order of Court dated 14th day of November 2022.
2. Unless otherwise stated the facts and matters deposed to herein are either derived from information within my personal knowledge or from documents which I have access, insofar as the facts are within my personal knowledge, they are true to the best of my information and belief.

FACTS

3. The subject matter relates to a traffic accident on 30th day of May 2019 where I was the owner and driver of motor car no. SKT 6392T along the extreme right lane of BKE towards PIE after Dairy Farm Exit and came to a stop behind traffic when motor car no. JSG 1661 driven by the Defendant collided into the rear of motor car no. SKZ 2846X driven by one CHUA TIAM HEE, the impact caused motor car no. SKZ 2846X to propel forward into the rear of my motor car no. SKT 6392T.

INTERLOCUTORY JUDGMENT

4. By consent, Interlocutory Judgment is entered against the Defendant for 90% of the damages to be assessed with costs reserved to the Registrar on the 20th day of September 2021.

REPAIR COSTS

5. As a result of the accident, my motor car was damaged. My motor car was sent to Team AutoPro Pte Ltd for repairs. Before repairs were effected, a survey of the damage was conducted by Impact Analysis Consultant and the cost of repairs was recommended at a lump sum of \$7,100.00 for repairs. The period of repairs was recommended to be 7 working days. The survey report fees is the sum of \$688.00. A copy each of the following documents are now shown to me and marked collectively as "A":-
 1. Invoice No. 9448 for \$688.00 dated 08.07.2019 from Impact Analysis Consultant;
 2. Survey Report Reference No. 20-09-9448 dated 08.07.2019 including 32 coloured photographs depicting the damages to my motor car SKT 6392T from Impact Analysis Consultant;
 3. Proforma Invoice No. P2009-1049 dated 15.09.2020 from Team AutoPro Pte Ltd;
 4. Vehicle Rental Agreement No. E15688 from M/s Cars For Rent (2016) Pte Ltd; and
 5. Rental Invoice No. E1906036 dated 20.06.2019 from M/s Cars For Rent (2016) Pte Ltd.

LOSS OF RENTAL

6. I am claiming for pre-repair inspection loss of rental at \$120.00 per day for 2 days which amounts to \$240.00 and loss of rental at \$120.00 per day for 12 days which amounts to \$1,440.00. The accident happened on the 30th day of May 2019, a Thursday. My motor car was surveyed on the 4th day of June 2019, a Tuesday. The

rental car was rented for 12 days from 3rd June 2019 till 15th June 2019, to cover the pre repair inspection period and the repair period of 7 working days for rental. A copy each of the rental documents is shown to me and marked as "A" at item 4 and 5.

7. I am claiming the following for my damages:-

1. Costs of Repairs	\$7,100.00
2. Pre-Repair Inspection (\$120.00/day x 2 days)	\$ 240.00
3. Rental (\$120.00/day x 12 days)	<u>\$1,440.00</u>
	\$8,780.00
	=====

SUMMARY

8. This accident was caused by the negligence of the Defendant in the driving, management and control of motor car no. JSG 1661 at the material time of the accident. I humbly urge this Honourable Court to grant me damages, interest and costs.

Affirmed by the abovenamed)
LEE HEUP SOON)
 on this 9th day of January 2023)
 through the interpretation of)
 Adrian Heng Thong How in Mandarin)

Lee Heup Soon

Before Me,

A COMMISSIONER FOR OATHS



THIS IS THE EXHIBIT MARKED "A"
REFERRED TO IN THE
AFFIDAVIT OF EVIDENCE-IN-CHIEF
OF
LEE HEUP SOON

AFFIRMED

THIS 9TH DAY OF JANUARY 2023

BEFORE ME,



A COMMISSIONER FOR OATHS

Our reference: 20-09-9448

Date: 8/7/2019

INVOICE NO. 9448

Lee Heup Soon

c/o Team Autopro Pte Ltd

385 Sin Ming Drive

#01-02 Vicom Inspection Centre

Singapore 575718

Registration No. **SKT6392T**

We enclose our fee note for your kind attention, which remains payable irrespective of the outcome of this case.

S/No.	Description of Services Provided	Qty	Amount
1	Being vehicle damage assessment report, inspection, photographs, transport and miscellaneous.	1	\$ 688.00
Total amount			<u>\$ 688.00</u>

Please kindly cross all cheques made payable to "Impact Analysis Consultant".

We thank you in anticipation for your prompt payment.

L. L. Tan (Ms)

Principal Consultant

Our reference: 20-09-9448

Date: 8/7/2019

c/o Team Autopro Pte Ltd
385 Sin Ming Drive
#01-02 Vicom Inspection Centre
Singapore 575718

Dear Sirs

**RE: Road Traffic Accident on 30/5/2019
Lee Heup Soon**

In accordance with your instructions received in this office on **4/6/2019**, we made arrangements to examine the vehicle on **4/6/2019** at above-mentioned address. The following data was recorded:

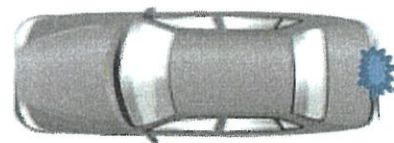
Vehicle details

Make	Toyota	Registration	SKT6392T
Model	Corolla Altis	Chassis	MR053REH104534187
Colour	Silver	Gearbox	Auto
Odometer	101956km	Paintwork	Good
Steering	In order	Brakes	In order
Condition	Good		

Tyre Depths

Front left	205/55R16	85% Michelin
Front right	205/55R16	85% Michelin
Rear left	205/55R16	80% Yokohama
Rear right	205/55R16	80% Yokohama

Impact Direction & Area of Damage:



Status	REPAIRABLE
Magnitude	Medium
Legal status	Unroadworthy

Following our examination of the accident damage, we have calculated repair times and method, which are detailed on page 2 & 3. We would recommend a sum of **\$7,100.00** and **7** working days for repair, which is sufficiently lower than the pre accident value to render the vehicle an economically and physically reliable proposition.

Subsidiaries of Impact Analysis Consultant:

• Impact Analysis Consulting Pte Ltd • Impact Analysis Academy Pte Ltd • IA Racking Solutions Pte Ltd
• IA Accounting & Consultancy Pte Ltd • Infoknights International Services (Philippines) • IABN Pte Ltd
www.iaconsultingsg.com

Our reference 20-09-9448

Date 8/7/2019

Page 2

Section A: Damaged Parts Assessment

Part's Description	Qty	Condition As inspected	Repairer's Estimate	Our Adjustment
List Items:				
Boot lid	1	buckled	1021.50	1021.50
Boot lid outer chrome	1	damaged/bent	296.70	296.70
Boot lid hinges @\$75.00	2	bent	150.00	150.00
Boot lid weatherstrip	1	abraded	166.00	166.00
Boot lid inner lock	1	bent-in/jammed	205.80	205.80
Boot lid emblem Toyota	1	necessary	55.00	55.00
Boot lid emblem Altis	1	necessary	48.00	48.00
Boot lid logo	1	necessary	54.00	54.00
Boot lid reflector @\$310.00	2	edge cracked	620.00	620.00
Rear bumper	1	deformed	711.00	711.00
Rear bumper side retainer @\$35.00	2	necessary	70.00	70.00
Rear bumper reflector @\$85.60	2	intact	171.20	0.00
Rear end panel	1	repair	671.50	0.00
Rear end panel top garnish	1	deformed	162.40	162.40
Rear fender lh	1	bent	985.10	985.10
Rear fender rh	1	repair.respray	985.10	0.00
Rear windscreen moulding	1	necessary	121.50	121.50
Tail lamp @\$402.30	2	holder damaged	840.60	840.60
Sub- Total cost			7335.40	5507.60
Percentage discount : 25%			1833.85	1376.90
Sub-Total costs for parts			5501.55	4130.70

Special Nett Items:

Rear bumper reverse sensor	set	malfunction	250.00	250.00
Rear end panel top garnish clips	3	necessary	15.00	15.00
Rear windscreen glass sealant	1	necessary	50.00	50.00

Our reference 20-09-9448

Date 8/7/2019

Rear bumper clips	set	necessary	50.00	50.00
Reverse camera	1	malfunction	350.00	350.00
Sub-Total costs for parts			715.00	715.00

Parts Repair

*	*	*	0.00	0.00
Sub- Total costs			0.00	0.00
Total costs for parts			6216.55	4845.70

Our reference 20-09-9448

Date 8/7/2019

Page 3

Section B: Labour Cost Calculation

	Hourly rate	Manhr. Req.	Total
To dismantle, replace, cut, weld, knock out dents to straighten accident parts as-mentioned on the 'Parts Repair' column inclusive of replacement parts.	\$ 50.00	30	\$ 1,500.00
Putty & Spray painting to adjacent panels. Job allowance. Paint / material.	Sub-contract work.		\$ 1,350.00
Apply rust proofing on the adjacent panels.	Sub-contract work.		\$ 80.00
Remove and replace rear bumper reverse sensor & conduct distance safety setting.	\$ 50.00	1.7	\$ 85.00
Remove and replace rear reverse camera & conduct distance safety setting	\$ 50.00	1.7	\$ 85.00
Remove and refix rear windscreen glass. (2-man job)	\$ 50.00	3	\$ 150.00
Wiring / bulb checking (inclusive of re-focus / re-adjust on angle of light intensity.)	\$ 50.00	0.5	\$ 25.00
Total labour cost			\$ 3,275.00

Manhour rate and the number of manhours required for each repairing task are formulated based on individual workshop's operating cost and in-house@ IA Research Guidelines respectively.

Our reference 20-09-9448

Date 8/7/2019

Section C: Summary Table of Total Repair Cost

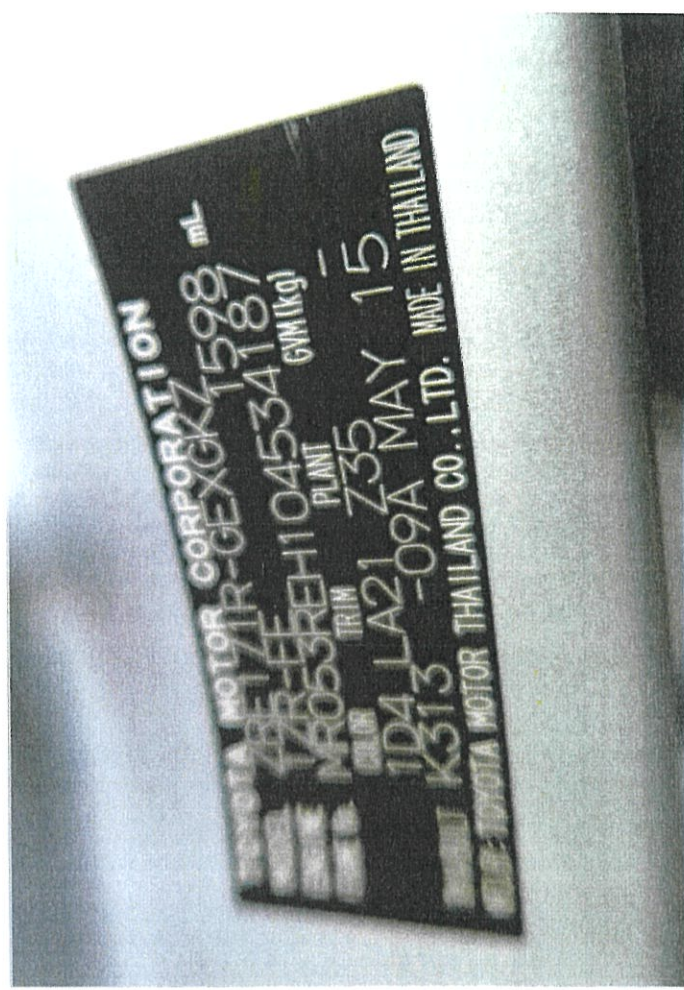
Description		Cost	
Damaged Parts Assessment (See section A)		\$4,845.70	
Further discount	20%	\$969.14	
Recommended cost of parts		\$3,876.56	(1)
Labour Cost Calculation (See section B)		\$3,275.00	(2)
Total Repair Cost (Round off to hundred)		\$7,100.00	(1) + (2)

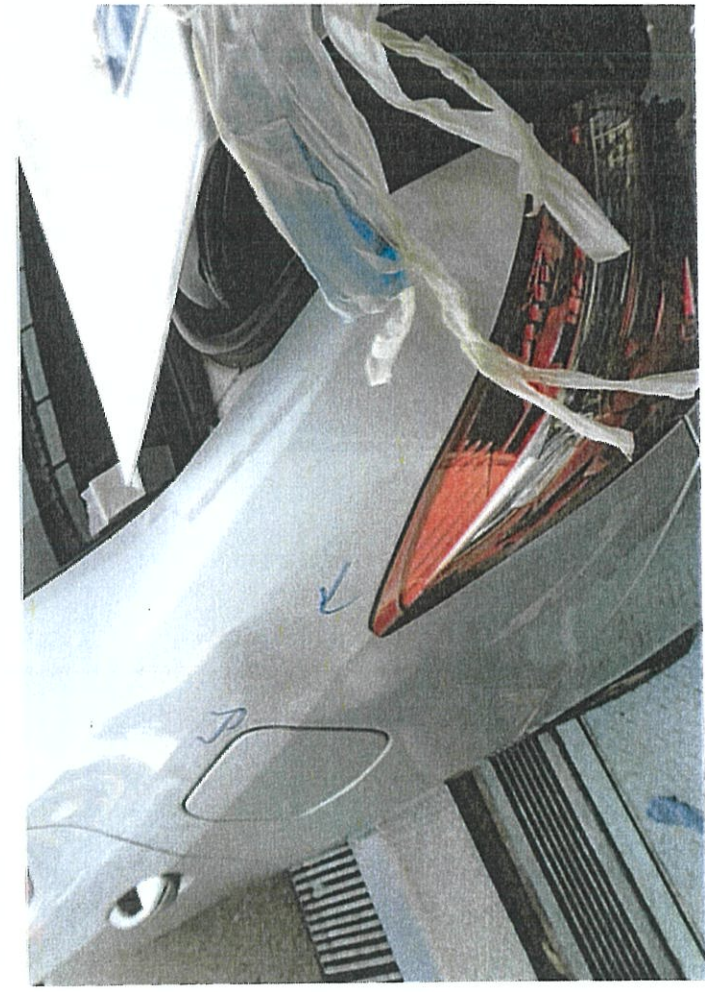
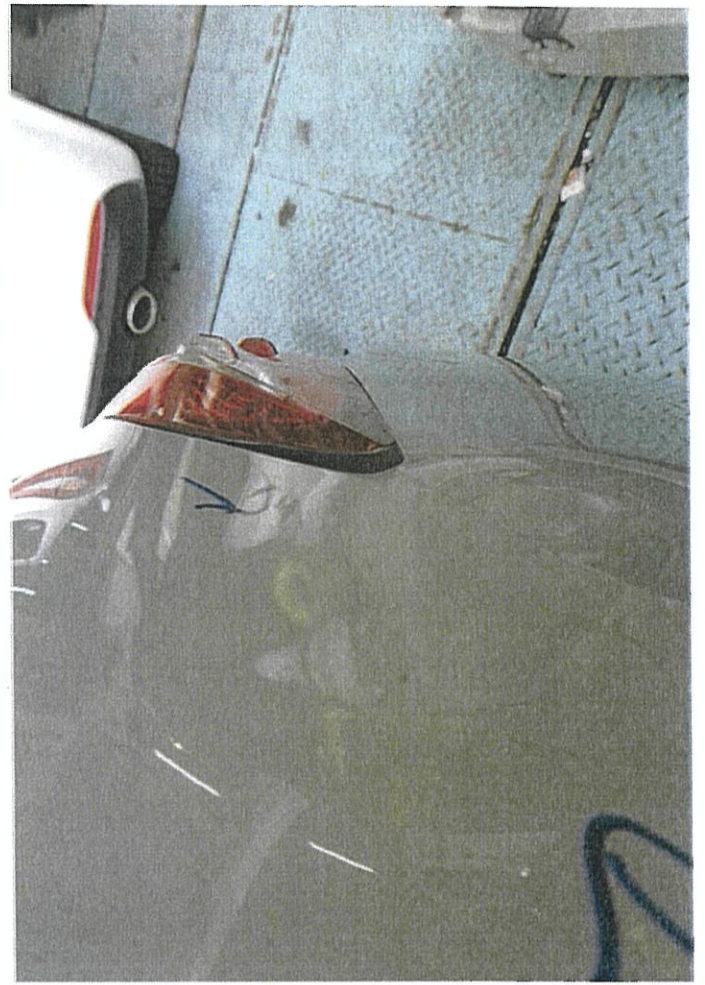
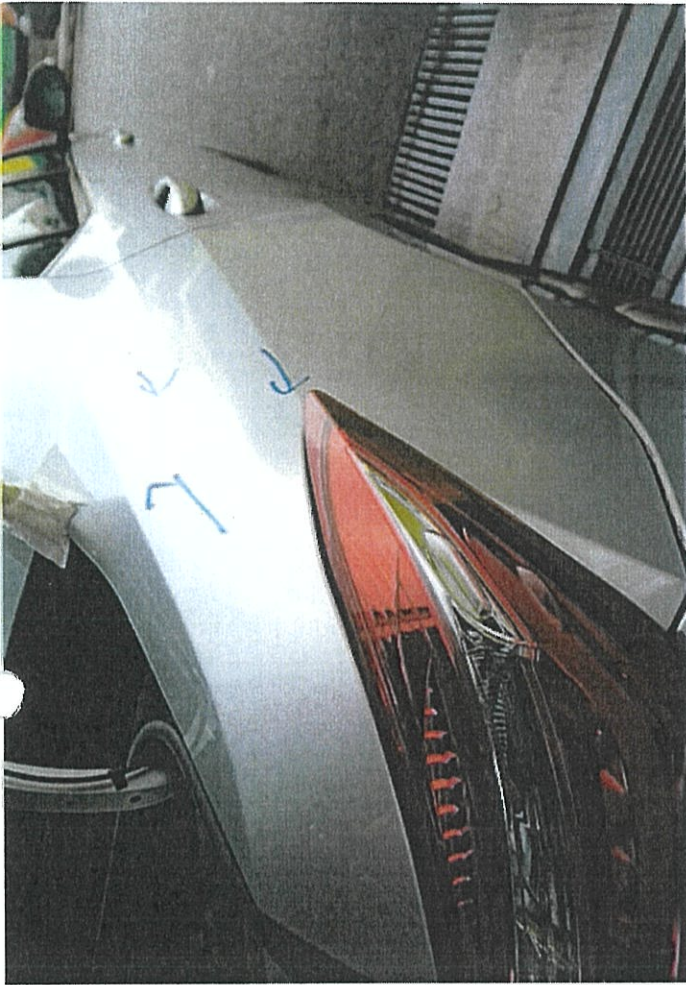
We would recommend a sum of **\$7,100.00** and **7** working days for repair.
No further items will be approved without our expressed written agreement. Any significant additional items will be subject to a supplementary report.

Mechanical Engineer, Accident Expert Witness, Licensed Appraiser (Automobile)
B.Eng. (Hons, NUS)
Diploma.Mechanical Engineering
NTC-2 Automovite Technology
Sr.MIES, Institution of Engineers, Singapore (#20100091)
MATAI, Maryland Association of Traffic Accident Investigators
IAARS, International Association of Accident Reconstruction Specialists
PMC of Singapore Business Advisors & Consultants Council
ACTA certified Trainer, Singapore
Enterprise Singapore - Recognised Certification for Management Consultants
IMI Professional Certificate In Vehicle Accident Damage Assessment (UK)

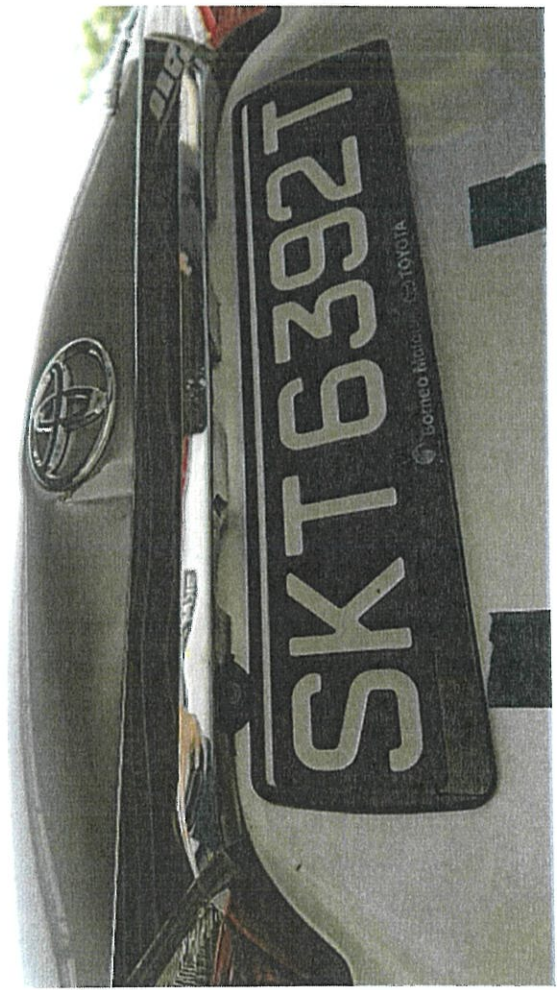
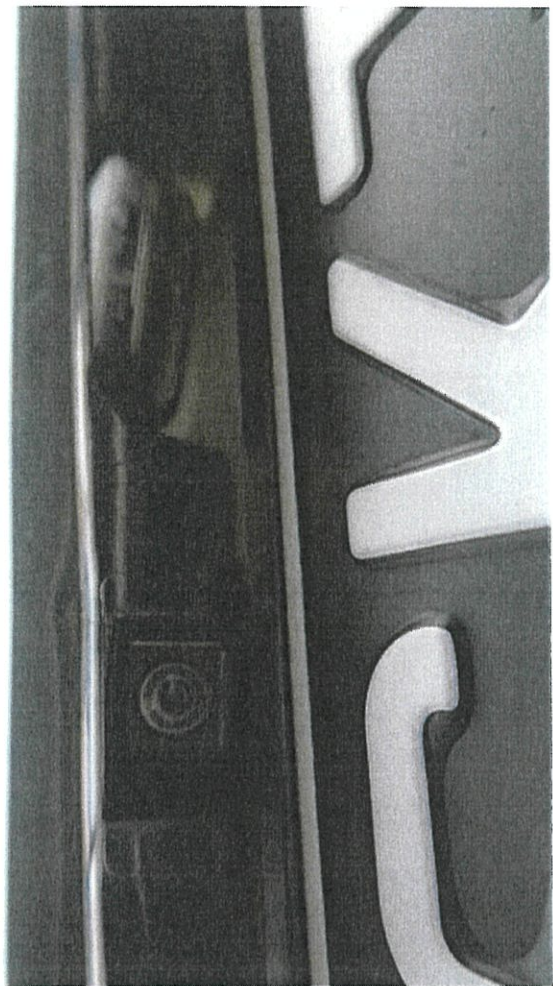
Subsidiaries of Impact Analysis Consultant:

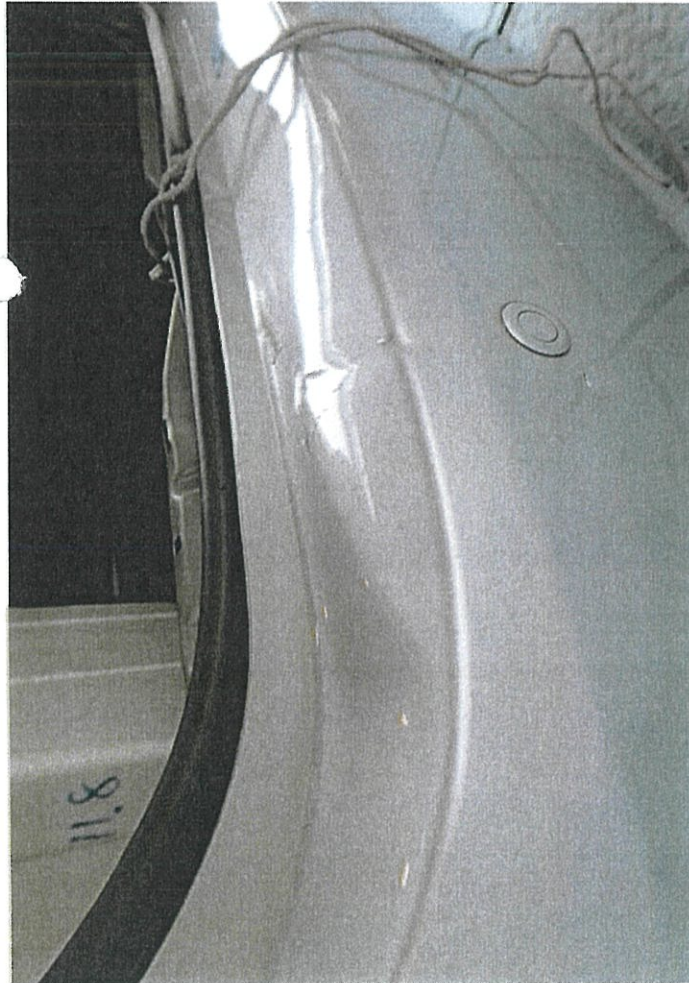
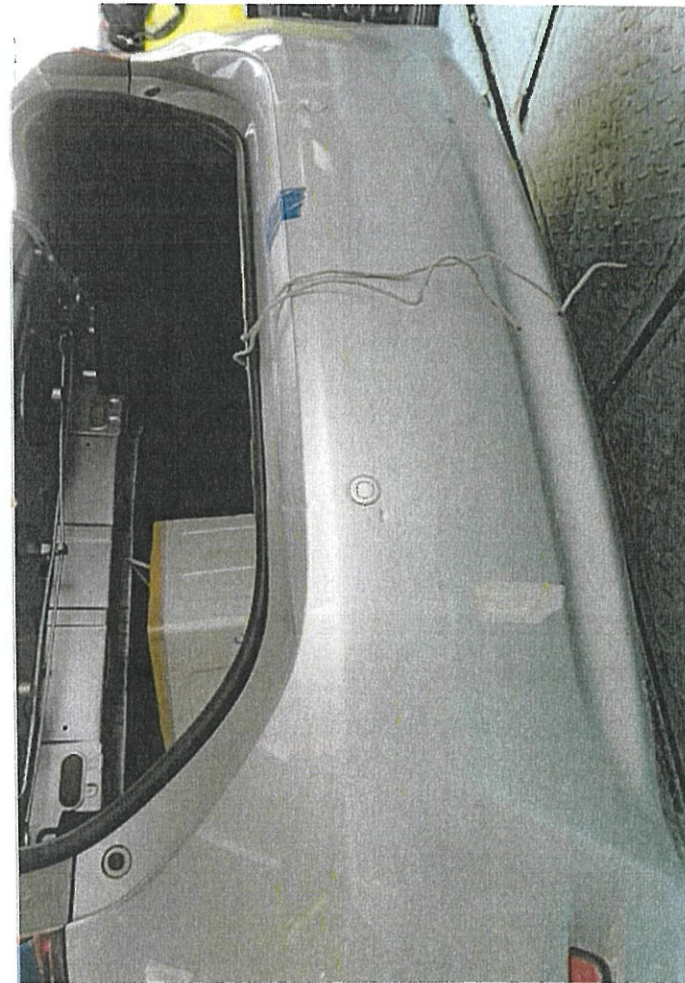
• Impact Analysis Consulting Pte Ltd • Impact Analysis Academy Pte Ltd • IA Racking Solutions Pte Ltd
• IA Accounting & Consultancy Pte Ltd • Infoknights International Services (Philippines) • IABN Pte Ltd
www.iaconsulting.sg.com

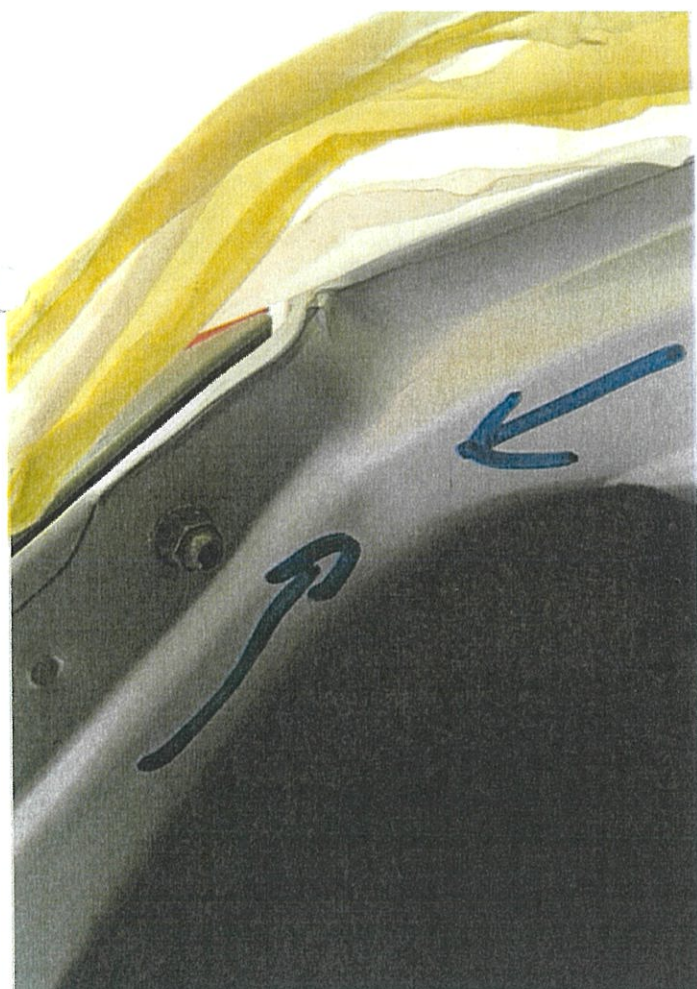


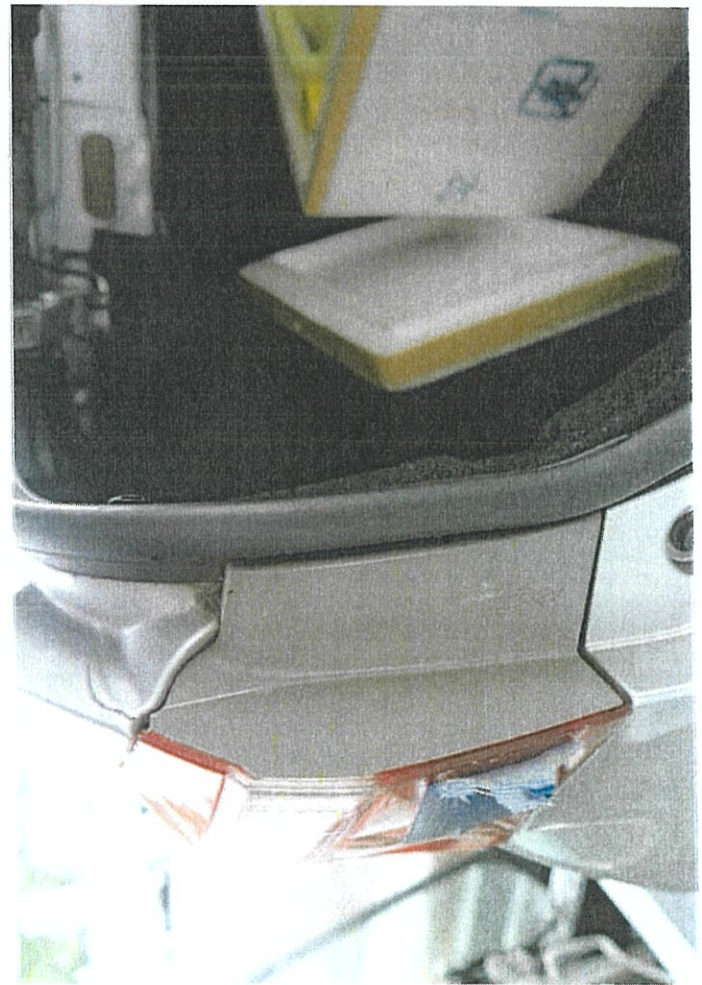














PROFORMA INVOICE

**ATTENTION:**

Lee Heup Soon

PI Number	P2009-1049
PI Date	15-Sep-2020
Vehicle No.	SKT 6392T
Accident Date	30-May-2019

S/No	Description	Unit Price	Quantity	Amount
1	Spare Parts and Labour for Accident Repair of Vehicle Nos. SKT 6392T	COR Lump Sum		\$ 7,100.00

Notes:

1) All payments must be made only in the form of cash or crossed cheque payable to "Team AutoPro Pte Ltd".

Total Amount	\$	7,100.00
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Authorized Signature



CARS FOR RENT (2016) PTE LTD


5 Tanah Merah Kechil Road #17-05 S 46665
Tel: 6789 5155 Fax: 67835155

TEAM AUTO
No: E 15688

ROC No: 201609732N

VEHICLE RENTAL AGREEMENT

SKT 6392T


HIRER'S PARTICULAR Name: (as in I/C) <u>Lee HWP Soon</u> NRIC/PASSPORT No: <u>S1261837C</u> Address (Res): <u>636 Senja rd #11-764</u> <u>SPORE 670656</u> Name & Address of Employer _____ Occupation: _____ Driving Exp: _____ Driving Licence No: _____ D/L Type: Local / International Issue Date: _____ Date of Birth: _____ Tel: (O) _____ (R) _____ HP/PG <u>96324784</u>		Vehicle No: <u>SLC 4394</u> Replace Veh No: _____ Mileage Out: <u>34467</u> Mileage Out _____ Make & Model: <u>TOYOTA VIOS</u> (Auto / Manual) Group: _____ OUT : Date <u>03/06/19</u> Time: <u>14:50 PM</u> HIRE/PERIOD EXPIRY: _____ COLLISION DAMAGE WAIVER Excess <u>2000</u> YES / NO PERSONAL ACCIDENT INSURANCE YES / NO																																					
ADDITIONAL DRIVER'S PARTICULARS Name: (as in I/C) _____ NRIC/PASSPORT No: _____ Address (Res): _____ Driving Licence No: _____ D/L Type: Local / International Issue Date: _____ Date of Birth: _____ Occupation: _____ Driving Exp: _____		CHARGES <table border="1"> <tr> <td>Daily</td> <td>12 @ \$ 120</td> <td>per day</td> <td>\$ 1440 00</td> </tr> <tr> <td>Weekly</td> <td>@ \$</td> <td>per week</td> <td></td> </tr> <tr> <td>Monthly</td> <td>@ \$</td> <td>per month</td> <td></td> </tr> <tr> <td>Hours</td> <td>@ \$</td> <td>per hour</td> <td></td> </tr> <tr> <td>Others</td> <td>@ \$</td> <td></td> <td></td> </tr> <tr> <td>CDW</td> <td>@ \$</td> <td>per day/month</td> <td></td> </tr> <tr> <td>PAI</td> <td>@ \$</td> <td>per day/month</td> <td></td> </tr> <tr> <td>Delivery Service</td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="3">SUB-TOTAL \$</td> <td></td> </tr> </table>		Daily	12 @ \$ 120	per day	\$ 1440 00	Weekly	@ \$	per week		Monthly	@ \$	per month		Hours	@ \$	per hour		Others	@ \$			CDW	@ \$	per day/month		PAI	@ \$	per day/month		Delivery Service				SUB-TOTAL \$			
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In	E	1/4	1/2	3/4	F																																		
ACCESSORIES CHECK <input type="checkbox"/> Ashtray <input type="checkbox"/> Cig Lighter <input type="checkbox"/> S/Tyre <input type="checkbox"/> STD Tools <input type="checkbox"/> Jack <input type="checkbox"/> Hub Caps <input type="checkbox"/> Radio / Cass <input type="checkbox"/> CD <input type="checkbox"/> Catridges		Rented out by: _____ Hirer's Signature  Addition Driver's Signature _____																																					

I have read and agree to the terms and condition on both sides of this agreement. If I have presented a charge/ credit card for payment, I agree that all amount payable under this agreement and for parking and traffic infringements may be billed to that account and my signature above will be considered to have been made on the charge/credit card voucher. All information I have given CARS FOR RENT (2016) PTE LTD in connection with this agreement is true.

* IMPORTANT

- ONLY PERSON ABOVE 23 YEARS OF AGE WITH MORE THAN 2 YEARS DRIVING EXPERIENCE, AUTHORISED, LICENSED AND SIGNING THIS AGREEMENT MAY DRIVE THE VEHICLE.
- ALL PARKING AND TRAFFIC VIOLATIONS ARE THE RESPONSIBILITY OF THE HIRER. AN ADMINISTRATIVE CHARGE WILL BE LEVIED ON ANY TRAFFIC VIOLATIONS REDIRECTED.
- THE HIRER SHALL BE LIABLE FOR EXCESS CHARGES FOR ANY LATE RETURN AT THE RATE SHOWN PER HOUR OR PER DAY, INCLUSIVE OF CDW AND /OR PAI WHERE APPLICABLE.
- IN CASE OF ACCIDENT, THE HIRER SHALL REPORT TO RENTAL OFFICE IMMEDIATELY. IF THERE IS BODILY INJURIES, A POLICE REPORT MUST BE MADE WITHIN 24 HOURS.
- VEHICLE IS STRICTLY FOR SINGAPORE USE ONLY AND MAY NOT BE DRIVEN OUT OF SINGAPORE WITHOUT PRIOR CONSENT OF THE COMPANY CARS FOR RENT (2016) PTE LTD

RETURN OF VEHICLE - THE HIRER / DRIVER IS REQUIRED TO SIGN IN THE COLUMN "SIGNATURE OF HIRER / DRIVER" FAILING WHICH THE DAY AND TIME INSERTED BELOW SHALL DEEMED TO BE THE DAY AND TIME THE VEHICLE IS RETURNED TO CARS FOR RENT (2016) PTE LTD AND THE SAME SHALL BE ACCEPTED AS CONCLUSIVE EVIDENCE OF THE SAME AND SHALL NOT BE CHALLENGED OR QUESTIONED ON ANY ACCOUNT WHATSOEVER.

DATE IN	TIME IN	MILEAGE	CHECKED BY	REMARKS	SIGNATURE OF HIRER/DRIVER
<u>03/06/19</u>	<u>4:30 PM</u>	<u>34467</u>	<u>Pouch</u>		

CARS FOR RENT (2016) PTE LTD

Mailing Address: 23 Kaki Bukit Ave 4, #03-01 Vicom Inspection Centre
(South Wing), Singapore 415933
Workshops: 8 Kaki Bukit Ave 4, #08-40/45/46 Premier@Kaki Bukit,
Singapore 415875
Co. Reg'n No.: 201609732N

Invoice #: E1906036
Date: 20-06-19

Bill To:

Lee Heup Soon
Apt Blk 656 Senja Road #11-264
Singapore 070656

Ship To:

Lee Heup Soon
Apt Blk 656 Senja Road #11-264
Singapore 070656

1

Description	Amount	Job No.
Vehicle Rental for period 03.06.2019 to 15.06.2019 (Billing for 12days x \$120.00/per day) (Vehicle No.: SKT6392T)	\$1,440.00	SLC4394D N-T

Your Order #: E15688

COMMENT	CODE	RATE	GST	SALE AMOUNT	Total Inv Amt:
	N-T	0%	\$0.00	\$1,440.00	\$1,440.00
	SR	7%	\$0.00	\$0.00	
					Amount Applied: \$0.00
					Balance Due: \$1,440.00