

GURDEEP SINGH SEKHON  
CHIA KOK SENG  
REY FOO JONG HAN  
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NAVINDER SINGH  
P. PADMAN  
DR. KWEH SOON HAN  
EMMANUEL-PREMNATH MAHESWARY  
HUE JIAPEI  
TAN XIN ER  
LIM YUN HENG  
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**CHINATOWN POINT OFFICE:**

133 New Bridge Road  
#17-03 Chinatown Point  
Singapore 059413  
Tel: 6538 3611  
Fax: 6538 3708

Website: <http://www.kscgp.com/>  
(Fax/Email not for service of court documents)  
Registered in Singapore with limited liability  
as a Limited Liability Partnership  
Registration Number T10LL1855L

Your Ref: SD22E00620/EPM/R2/E0  
Our Ref : **JP/SW/23/3107/CHH**  
Date : 12 June 2023

**DID:** 3152 0985  
**Email:** [jiapei@kscgp.com](mailto:jiapei@kscgp.com)

Liberty Insurance Pte Ltd  
51 Club Street  
#03-00 Liberty House  
Singapore 069428

By Email Only

Koh Kok Leong Enterprises Pte Ltd  
24 Tuas Ave 2  
Singapore 639455

By Certificate of  
Posting

Dear Sirs,

**LIN JINHUI**

C/o 133 New Bridge Road, #17-03 Chinatown Point, Singapore 059413  
**ACCIDENT INVOLVING SLT 7956Z AND AN EXCAVATOR AT PUNGGOL  
REGIONAL SPORTS CENTRE (CONSTRUCTION SITE) ON 07.02.2023**

We are instructed by the above named to claim damages against you / your authorised driver / your insured in connection with a road traffic accident on 07 February 2023 at Punggol Regional Sports Centre (construction site), involving our client's motor vehicle bearing registration number SLT 7956Z and an Excavator, which was driven / owned / insured by you at the material time.

We are instructed that the accident was caused by the negligent driving and/or management of your motor vehicle. As a result of the accident, our client's vehicle was damaged and our client has been put to loss and expenses, particulars of which are as follow:-

(1)	Cost of repair	-	\$	10,100.00
(2)	Loss of use	-	\$	5,280.00
(3)	Survey fees	-	\$	733.00
(4)	Incidentals	-	\$	100.00
(5)	Costs	-	\$	900.00
(6)	GST on items (4) & (5)	-	\$	80.00
		-	\$	<b>17,193.00</b>

**MAIN OFFICE: CONVEYANCING PRIVATE PROPERTY**  
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Singapore 188384  
Tel: 6817 6235 Fax: 6252 0614

**BRANCH: CORPORATE & LITIGATION**  
39 Robinson Road  
#14-01 Robinson Point  
Singapore 068911  
Tel: 6817 8795 Fax: 6224 1612

A copy each of the supporting documents is enclosed.

<u>S/NO.</u>	<u>AVAILABLE DOCS</u>	<u>PARTICULARS</u>
<u>Plaintiff's Documents</u>		
1.	07.02.2023 08.02.2023	GIA Statement / Traffic Police report
2.		<del>Video footage / CCTV / CD recording &amp; photos taken at the accident site</del>
3.		<del>Traffic police investigation results</del>
4.	01.03.2023	Repair bill / invoice / Excess Tax invoice
5.		<del>Rental bill / invoice and agreement / receipts</del>
6.	16.05.2023	Survey invoice and surveyor's report
7.	16.05.2023	<u>63</u> Original/ Copies of damage photographs
8.	10.02.2023	Pre-repair Inspection Notice
9.		<del>Tax invoices and search results from General Insurance Association of Singapore (GIA) and Traffic Police search fees</del>
10.		<del>Photos taken at the accident site</del>
11.		<del>Witnesses Statutory Declaration</del>
12.		<del>Vehicle Entry Permit receipt / E-day license for off-peak vehicle</del>
13.		<del>Towing fees / receipt (Singapore / Malaysia)</del>
14.		<del>Client sold off vehicle and produce letter from LTA</del>
15.		<del>Spare Part Ordering Form</del>
16.		<del>Levy at Custom / receipts</del>
17.		<del>Enquire PARF / COE Rebate for Registered Vehicle</del>
18.		<del>Enquire Transfer fee</del>
19.		<del>Certificate of Insurance / Motor Cover Note / New Policy Schedule / Registration Card / Grant / Road Tax</del>
20.		<del>Estimate of repairs with agreement by surveyors</del>
<u>Defendant's Documents</u>		
21.		<del>GIA Statement / Traffic Police report and photos taken at the accident site</del>
22.		<del>LTA search on / receipt / tax invoice</del>
23.		<del>RCB / ACRA search</del>
24.		<del>Admission Note</del>
25.		<del>Malaysia Vehicles Searches / service</del>
26.		<del>Enhanced Individual search / receipt</del>
27.		<del>Property tax search / receipt</del>
28.		<del>TP Insurer Enquiry</del>
<u>Others</u>		
29.	Various	<del>Correspondences of diverse dates exchanged between the Plaintiff's solicitors with the Defendant and/or his insurer/appointed adjusters/solicitors.</del>

We have on 10 February 2023 notified you / your insurer of the accident and a pre-repair inspection of our client's motor vehicle was carried out by the appointed surveyors.

Subject to our client's instructions, please confirm in writing within 7 days hereof if you / your insured wish to inspect our client's vehicle.

**Please note that you / your insurer should send to us an acknowledgement of receipt of this letter within 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 / your insurer. In this event, you / your insurer will be liable for any and all further legal costs incurred.**

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, which we will then forward to our client and/or the insurers for consideration on a without prejudice basis.

For avoidance of doubt, kindly note that this claim is made without prejudice to our client's personal injury claim.

Yours faithfully,

f. KSCGP

(Chinatown Point Office)

Enc.

Cc client