

**CHIA S ARUL LLC**  
ADVOCATES & SOLICITORS  
UEN201330709H

ARULCHELVAN S • RUTHRA RAM • DON TAN

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Our ref: AS.220975.kc

Your ref:

24 February 2023

MSIG INSURANCE SINGAPORE PTE LTD

BY EMAIL ONLY

(Attn: Motor Claims Department)

Dear Sirs,

ACCIDENT INVOLVING (DRIVER) SMG 5128S, SKV 5003M & SJK 6749H ALONG AYE  
TOWARDS CTE AFTER ALENDRA EXIT ON 08 OCTOBER 2022

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1. We act for Chen Wutong, the driver of SMG 5128S at the material time in his claim for personal injury suffered as a result of a road traffic accident that occurred on 08 October 2022 at 1140 hours involving SMG 5128S, SKG 5003M & SJK 6749H. (the "accident").
2. We have been instructed that the above accident was caused by your/your servant's and/or agent's negligence and/or contributory negligence in the driving and management of motor vehicle no. SKV 5003M. As a result of the accident, our client has been put to loss and expense.
3. Accordingly, and in compliance with the PIMA Protocol (see "NOTE" below), **we hereby give you notice of our client's intention to claim damages against you** for personal injuries and consequential loss and expense suffered by our client as a result of your/your servant's and/or agent's negligence and/or contributory negligence at the material time, and, if necessary, to commence legal action against you/your servant and/or agent for the same.

***NOTE:** The Pre-Action Protocol for Personal Injury Claims, Appendix E of the State Courts Practice Directions Amendment No. 1 of 2016 ("the PIMA") is relevant and applies to all claims for personal injury as a result of road traffic and industrial accidents. Relevant provisions of the mentioned PIMA will be hereafter highlighted. A soft copy can be found at: <https://epd.statecourts.gov.sg/Appendices.html#appendix-e-pre-action-protocol-for-personal-injury-claims>*

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151 CHIN SWEE ROAD • #03-09  
MANHATTAN HOUSE • SINGAPORE 169876  
TEL : (65) 6733 4647 • FAX : (65) 6733 8183 (not for Service of Court documents)  
EMAIL : [info@chiaarul.com](mailto:info@chiaarul.com)

4. In compliance with paragraph 3.2 of the PIMA Protocol, we set-out the quantification of our client's claim at this point in time as follows:-

General Damages

a)	Pain & Suffering	
	(i) Chest contusion	\$4,000.00
	(ii) Neck sprain( Whiplash injury)	\$4,000.00
	(iii) Migraine	\$3,000.00

Special Damages

a)	Medical expenses (continuing)	\$319.80
b)	Transport expenses (continuing)	\$100.00
c)	Loss of income	\$to be assessed
d)	Cost of repair	\$22,150.00
e)	Rental (\$180.00 x 18 days)	\$3,466.80

In view of an amicable settlement at this stage of the intended proceedings, we further render below a list of disbursements incurred (at this point in time):-

Disbursements incurred as to date:

a)	Medical report fee	\$300.00
b)	LTA search fee	\$7.49
c)	Survey report	\$1,225.00
d)	Incidentals	\$107.00

5. Please note that the above quantification is made on a "Without Prejudice" basis and we reserve our client's rights to re-quantify the claim.
6. Pursuant to paragraph 3.8 of the PIMA Protocol, kindly find annexed herewith copies of the following documents for your consideration:-
- a) GIA report filed by our client;
  - b) LTA search;
  - c) Medical Report and payment receipt issued by PEACE FAMILY CLINIC (WL832) PTE LTD;
  - d) Survey report and colour photographs;
  - e) Final repair invoice;
  - f) Rental invoice;
  - g) Medical receipt; and
  - h) Medical certificate.
7. We would like to bring to your attention paragraph 3.9 of the PIMA Protocol, which requires you to pass this letter of claim and the attached documents to your

- insurer immediately upon receipt, if you wish to make a claim under your insurance policy.
8. Please also be informed that paragraph 4.1 of the PIMA Protocol requires you to send us a letter acknowledging receipt of this letter within fourteen (14) days from the date of this letter. Failure to comply permits us to commence legal proceedings without sanction by the court (paragraph 4.2, PIMA Protocol).
9. Further, pursuant to the requirements of paragraph 4.4 of the PIMA Protocol, you are to write to us substantively on the following within 8 weeks from the date of this letter:
- a) Whether you, or, your insurer is/will be defending the claim. In the event your insurer is not defending the claim, the reason(s) for your insurer's decision not to is/are to be provided;
  - b) In the event your insurer is the party writing to us, apart from satisfying the other PIMA Protocol requirements, the reply letter must also state the name(s), telephone number(s), fax number(s) of the relevant insurance officer(s) handling the matter, as well as the insurer's file reference number(s) for the purposes of facilitating correspondence;
  - c) Your position on the claim on both liability and quantum. If the claim is not admitted in its entirety, reasons for the partial or complete non-admittance and a list of documents, together with copies of all relevant supporting documents, are to be provided. Please note that Singapore Accident Statements and police reports provided must be full and complete and must reflect the names, identification numbers and addresses of all persons involved in the accident together with type-written transcripts of their factual accounts of the accident;
  - d) You must also state your position on quantum and/or make an offer of settlement within fourteen (14) days of receipt of the medical report from the medical expert.
10. **TAKE NOTICE** that we wish to appoint our client's doctor(s) as the Single Joint Expert ("SJE") in the matter, as per the medical report and/or specialist medical report provide. Kindly let us know if you are agreeable to our proposed medical expert(s) to be the SJE in this matter.
11. In the event where the estimated quantum of the claim falls within the jurisdiction of a Magistrates Court (<\$60,000), you are required to send us a letter stating whether you agree or have any objections to the SJE appointment of the medical expert as proposed by us (relevant specialty) within fourteen (14) days of sending the acknowledgement letter to us (paragraph 4.3, PIMA Protocol). In the event

you fail to reply or fail to object to any of our proposed medical expert within the stipulated timeline, you are deemed to have agreed to the appointment of our medical expert as the SJE.

12. This letter serves as **NOTICE** to you and your insurers pursuant to Section 9(6)(a) of the Motor Vehicles (Third Party Risks and Compensation) Act 1960 that our client will commence legal proceedings against you / your servant and/or agent.

Thank you.

Yours faithfully,



**CHIA S ARUL LLC**  
Enclosure(s)



# LEASE A CAR PTE LTD

354 Alexandra Road #01-13 Alexis  
Singapore 159948 Tel: 64761970 Fax: 64761980

## Invoice

For account of  
**Chen Wutong**  
**SXXXX013D**  
**Blk 833 Woodlands Street 83**  
**#03-105**  
**Singapore 730833**

Invoice No.: 20201027/INV/4766-1  
Date: 27 October 2022

S/No.	Item Description	Amount (S\$)
	<b>For Hire of Used Vehicle with details as follow:</b>	
1.	Make & Model: Mercedes Benz E 200 Blueefficiency Vehicle Registration No.: SMJ4766R Original Regn. Date: 14 Nov 2012 Chassis No.: WDD2120482A602155 Engine No.: 27186030452709 Engine Capacity: 1796cc Body Colour: Silver	
	<b>vehicle Return on 26/10/2022</b>	
(i)	Rental fee Per day - \$180.00	
(ii)	Rental fee from 08/10/2022 to 26/10/2022 @18Days	\$ 3,240.00
	GST 7% of \$3,240	\$ 226.80
	Singapore Dollars Three Thousand Four Hundred Sixty Six And Cents Eighty Only	
	<b>Total Amount</b>	<b>\$ 3,466.80</b>

Crediting Bank Details:  
Name of Bank: Maybank  
Bank A/c No.: 042-11081-905  
A/c Name: Lease A Car Pte Ltd

"This is a computer generated invoice. Authorised signature is not required."

# UNITED Appraisal And Management Pte Ltd

Motor Vehicle Appraiser and Insurance Loss Adjuster  
No. 10 Kaki Bukit Ave 4 #06-75 Premier @ Kaki Bukit Singapore 415874  
Handphone No. : +65 9146 1186 Email : united.appraisal@live.com.sg  
Business Registration Nos. : 200817301N

## INVOICE

To : Chen Wu Tong  
c/o : Benz Bodyworkz Pte Ltd  
8 Kaki Bukit Ave 4  
#07-21  
Singapore 415875

Date : 07 Dec 2022

Invoice No. : 8094361

DESCRIPTION	AMOUNT
<b>Service rendered for appraisal / inspection report :</b>	
Professional inspection fees	SGD 1,225.00
Photographs 130 pcs	
Transport fees	
Re-inspection fees (work in progress, post repair inspection)	
<b>Total</b>	<b>SGD 1,225.00</b>
Singapore dollar :	
ONE THOUSAND TWO HUNDRED TWENTY FIVE ONLY.	
Registration no. : SMG5128S	
Make/Model : bmw 216i Gran Tourer	
Our reference : UAM22.10.13-AK-STP-BBW-SMG5128S	
<b>All payments made payee to:-</b> <b>" UNITED APPRAISAL &amp; MANAGEMENT PTE LTD "</b>	



for UNITED APPRAISAL & MANAGEMENT PTE LTD

# UNITED Appraisal And Management Pte Ltd

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No. 10 Kaki Bukit Ave 4 #06-75 Premier @ Kaki Bukit Singapore 415874  
Handphone No. : +65 9146 1186 Email : united.appraisal@live.com.sg  
Business Registration Nos. : 200817301N

Our ref. : UAM22.10.13-AK-STP-BBW-SMG5128S

Date : 07 Dec 2022

Chen Wu Tong

**WITHOUT PREJUDICE**

Dear Sir,

**Re : Third Party Claim For Vehicle Registration No. SMG5128S**

We refer to your instruction to appraise the above-mentioned vehicle on 11 October 2022

A static inspection was carried out and our report is enclosed for your perusal. The estimated cost of repair submitted by Messrs. Benz Bodyworkz Pte Ltd for SGD 32,281.97 as per our attached schedule has been inspected thoroughly by us against the actual damages sustained on the above-mentioned vehicle and we recommend the replacement and rectification accordingly.

Our revised quotation for the repair is SGD 27,700.58. In our opinion, it to be excessive. Therefore, we recommend a contract lump-sum repair cost. This is more economical than to have the above-mentioned vehicle repaired on parts by/for parts basis. Invariably, the repairer has the prerogative/option for the recommended replacement parts to either be repaired or be replaced.

We have negotiated with the repairer and they have agreed to repair the above-mentioned vehicle for SGD 22,150.00 NETT. Which, in our opinion is fair and reasonable.

The repairer has agreed to undertake the repairs to your requirement at the recommended contract lump-sum. However, we have not given any instruction and authorisation to the repairer to proceed with the repairs.

Under normal circumstances, the entire repair of the damaged vehicle should be completed within a reasonable period of 12 (Twelve) days.

We are reverting the matter to you for a decision, and enclosed is our vehicle inspection report, appraisal schedule and invoice for services rendered.

Please do not hesitate to contact us if you have any queries on this matter.

Yours faithfully,  
United Appraisal & Management Pte Ltd



Ananda K. Biswas Marc  
Motor Vehicle Appraiser

Encls. :

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# UNITED Appraisal And Management Pte Ltd

Motor Vehicle Appraiser and Insurance Loss Adjuster  
No. 10 Kaki Bukit Ave 4 #06-75 Premier @ Kaki Bukit Singapore 415874  
Handphone No. : +65 9146 1186 Email : united.appraisal@live.com.sg  
Business Registration Nos. : 200817301N

## VEHICLE INSPECTION REPORT

To : Chen Wu Tong

Our ref. : UAM22.10.13-AK-STP-BBW-SMG5128S

Date : 07 Dec 2022

### REFERENCE

Assign by	: Chen Wu Tong	Insured	: To be advice
Assign on	: 11 Oct 2022	Policy no.	: To be advice
Inspection on	: 11 Oct 2022	Claim no.	: To be advice
Accident on	: 08 Oct 2022	Sum insured	: To be advice
Workshop name	: Benz Bodyworkz Pte Ltd	Excess	: Not applicable
Inspection at	: 8 Kaki Bukit Ave 4 #07-21 Singapore 415875	3rd party Veh.	: To be advice
		3rd party ins.	: To be advice

### PARTICULARS OF DAMAGED VEHICLE

Registration no.	: SMG5128S	Odometer	: 175092 km
Make / Model	: bmw 216i Gran Tourer	Chassis no.	: WBA6V12070ED05531
Regn. date	: 21 Dec 2018	Engine no.	: 40095409B38A15A
Body colour	: Black	Engine cap.	: 1499 cc

### PRE-ACCIDENT CONDITION OF VEHICLE (STATIC CHECK ONLY)

Steering	: In order	Paintwork	: Good
Footbrake	: In order	Undercarriage	: Serviceable
Handbrake	: In order	Gen. condition	: Good

### TYRE CONDITION ON VEHICLE

	Make	Size	Tread depth	Type of road wheel
Front N/S	: Pirelli	205/55R17	70%	Alloy
Front O/S	: Pirelli	205/55R17	70%	Alloy
Rear N/S	: Pirelli	205/55R17	70%	Alloy
Rear O/S	: Pirelli	205/55R17	70%	Alloy

NOTE: The above percentages represent the estimated remaining life of tyre threads.

\* Denotes damaged component/s

**POINT OF IMPACT**

On the rear and front portion in the direction from rear to front causing vehicle surge forward and collided onto front vehicle.

**SYNOPSIS OF DAMAGES RESULTANT FROM THE ACCIDENT**

The impact of the collision has damaged / affected the tailgate, taillamp, rear bumper, rear end panel, rear well panel, exhaust, front bumper, front grille, headlamp and etc...

Please refer to Annex A (Appraisal Schedule) for a detailed account of the damages and photographs taken.

*Note: Reinspection vehicle on 14 Oct 2022 for repair in progress.*

**RECOMMENDATION**

The estimate cost of repair submitted by Messrs Benz Bodyworkz Pte Ltd as per schedule attached has been revised and scrutinised, and in our opinion, we consider it to be fair and reasonable. The repairers have agreed to undertake the repairs to the owner's satisfaction at our revision. We have not authorised the repairs.

Our adjusted cost of repair is SGD 22,150.00 to carry out the repairs. Please refer to Annex A (Appraisal Schedule) for a detailed account of the cost estimates.

**REMARKS**

We have not authorised the repair. However, for information, under normal circumstances, the repair would take approximately 12 (Twelve) working days to complete.

In accordance to your instruction, we have **NOT AUTHORISED** the repair to the damaged vehicle and the survey was conducted strictly on a "**WITHOUT PREJUDICE**" basis.

We are pleased to advise that the inspection work was carried out accordingly, and hereby submit our Appraisal Report, which includes evidence photographs.

Yours faithfully,  
United Appraisal & Management Pte Ltd



Ananda K. Biswas Marc  
Motor Vehicle Appraiser

## APPRAISEMENT SCHEDULE

Annex A

Registration no. : SMG5128S

Our reference : UAM22.10.13-AK-STP-BBW-SMG5128S

S/N	Qty	Description	Condition / Remarks	Estimate by Wshop SGD	Adjusted Amt SGD
<u>LIST ITEMS</u>					
1	1	Tailgate	Dented	1750.06	1750.06
2	1	Tailgate weatherstrip	Necessary	189.20	189.20
3	1	Tailgate logo	Necessary	83.00	83.00
4	1	Tailgate outer chrome moulding	Necessary	194.20	194.20
5	1	Tailgate windscreen moulding	Necessary	158.00	158.00
6	2	Tailgate damper (Auto) @ SGD 524.00	Malfunction	1048.00	1048.00
7	1	Tailgate trimboard	Distorted	371.24	371.24
8	1	Tailgate inner lock	Distorted	247.53	247.53
9	1	Tailgate lock actuator	Shorted	625.70	625.70
10	1	Tailgate kick sensor w/ module assy	Cut/Shorted	586.40	586.40
11	2	Tailgate reflector lamp @ SGD 354.68	Not Necessary	709.36	0.00
12	2	Taillamp @ SGD 784.00	Damaged	1568.00	1568.00
13	2	Taillamp lower bracket @ SGD 83.55	Distorted	167.10	167.10
14	1	Rear bumper	Cut	1220.00	1220.00
15	2	Rear bumper side mount @ SGD 209.85	Distorted	419.70	419.70
16	2	Rear bumper bracket @ SGD 214.70	Cut	429.40	429.40
17	2	Rear bumper reflector @ SGD 69.70	Missing/Distorted	139.40	139.40
18	1	Rear bumper tow cover	Distorted	65.67	65.67
19	4	Rear bumper sensor (ORI) @ SGD 301.65	Shorted	1206.60	1206.60
20	4	Rear bumper sensor holder @ SGD 22.64	Necessary	90.56	90.56
21	4	Rear bumper sensor ring @ SGD 15.10	Necessary	60.40	60.40
22	1	Rear bumper lower	Cut	315.00	315.00
23	1	Rear bumper reinforcement	Bent	523.18	523.18
24	1	Rear end panel outer	Dented	795.00	795.00
25	1	Rear end panel top garnish	Deformed	184.29	184.29
26	1	Rear well panel	Refer To Labour	0.00	0.00
27	1	Exhaust	Buckled	1650.80	1650.80
28	2	Exhaust mounting @ SGD 47.35	Stretched	94.70	94.70
29	1	Exhaust heat shield upper	Warped	184.00	184.00
30	1	Exhaust heat shield rear	Warped	220.00	220.00
31	1	Front bumper	Deformed	1422.32	1422.32
32	2	Front bumper side retainer @ SGD 112.48	Necessary	224.96	224.96
33	1	Front bumper centre air-grille	Re-Used	186.40	0.00
34	2	Front bumper side garnish @ SGD 125.00	Re-Used	250.00	0.00
35	1	Front bumper logo	Necessary	83.00	83.00
36	4	Front bumper sensor (ORI) @ SGD 301.65	2pcs Shorted	1206.60	603.30
37	4	Front bumper sensor holder @ SGD 22.64	Necessary	90.56	90.56
38	4	Front bumper sensor ring @ SGD 15.10	Necessary	60.40	60.40
39	2	Front grille @ SGD 137.03	Cracked	274.06	274.06
40	2	Headlamp L.E.D @ SGD 2580.00	Cracked	5160.00	5160.00
41	1	Front air duct assy	Cut/Distorted	340.78	340.78
				24595.57	22846.51
Less 0% / 5%				0.00	1142.33
				24595.57	21704.18

## APPRAISEMENT SCHEDULE

Annex A

Registration no. : SMG5128S

Our reference : UAM22.10.13-AK-STP-BBW-SMG5128S

S/N	Qty	Description	Condition / Remarks	Estimate by Wshop SGD	Adjusted Amt SGD
<u>SPECIAL NETT ITEMS</u>					
1	1	Sundries	Necessary	40.00	30.00
3	1	Tailgate windscreen primer & cleaner	Necessary	100.00	80.00
4	1	Tailgate windscreen sealant	Necessary	80.00	60.00
5	1	Tailgate windscreen inner seal	Necessary	175.00	175.00
6	1set	Tailgate trimboard clips	Necessary	55.00	55.00
7	2set	Tailgate reflector lamp clips @ SGD 20.00	Necessary	40.00	40.00
8	2	Tailgate reflector lamp seal @ SGD 24.00	Necessary	48.00	48.00
2	1	Tailgate sealant	Necessary	100.00	90.00
9	2set	Taillamp clips @ SGD 24.70	Necessary	49.40	49.40
10	2	Taillamp seal @ SGD 32.00	Necessary	64.00	64.00
11	1set	Rear bumper clips	Necessary	80.00	80.00
12	1	Rear bumper top sill plate (Accessories)	Necessary	220.00	220.00
14	1set	Rear end panel top garnish clips	Necessary	45.00	45.00
13	1	Rear end panel sealant	Necessary	100.00	90.00
15	1set	Front bumper clips	Necessary	80.00	80.00
				1276.40	1206.40
<b>TOTAL</b>				25871.97	22910.58

LABOUR & MISC CHARGES

1	To dismantle / renew rear accident damaged portion. To panel beating, reshape, straighten, orientate and align repair / replacement parts.	SGD 350.00/day	1800.00	1400.00
2	To dismantle / renew front accident damaged portion. To panel beating, reshape, straighten, orientate and align repair / replacement parts.	SGD 350.00/day	1200.00	700.00
3	To disconnect wire harness of electrical component to facilitate repairs, reconnect and check functions.		80.00	60.00
4	To remove and refit interior upholstery to facilitate the repair.		200.00	180.00
5	To remove and refit tailgate windscreen to facilitate the repair.		180.00	150.00
6	To remove and refit tailgate component to replace tailgate, check and re-adjust the close gap and alignment and water seepage.		100.00	80.00
7	To remove and refit, straighten and readjust exhaust pipe and replace exhaust silencer.		150.00	120.00
8	To diagnose and reset ECU program.		500.00	420.00

## APPRAISEMENT SCHEDULE

Annex A

Registration no. : SMG5128S

Our reference : UAM22.10.13-AK-STP-BBW-SMG5128S

S/N	Qty	Description	Condition / Remarks	Estimate by Wshop SGD	Adjusted Amt SGD
9		To apply undercoating on the accident repair and replaced panel for rust protection.		100.00	80.00
10		Supply spray paint material and necessary items to respray tailgate, rear bumper, rear end panel, rear well panel, rear fenders and other affected area / panel.	SGD 300.00/pnl	1500.00	1200.00
11		Supply spray paint material and necessary items to respray front bumper and other affected area / panel.	SGD 300.00/pnl	600.00	400.00
<b>TOTAL</b>				6410.00	4790.00
<b>Total Parts and Labour Cost of Repair</b>				32281.97	27700.58
<b>Less (Lumpsum repair adjustment)</b>					5550.59
<b>Adjustment Parts and Labour Cost of Repair</b>					22150.00

































































