



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/220521/0822/SM-PI/cks

Your Ref: SJN 2524A

1 February 2023

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

BY EMAIL
WITHOUT PREJUDICE

Cc: MUHAMMAD ZULHILMI BIN MOHAMED ROHAIDZAT
Blk 109D Canberra Walk
#08-344
Singapore 754109

BY POST
WITHOUT PREJUDICE

Dear Sirs

CLAIMANT: MOHAMED NASHIRUDEEN BIN ABDUL HADI

PROPERTY DAMAGE AND PERSONAL INJURY CLAIMS ARISING FROM ACCIDENT INVOLVING VEHICLES FBJ 9852Y & SJN 2524A ALONG TPE ON 31 JULY 2022

We are instructed by the abovenamed to claim damages against you in connection with an accident on 31st July 2022 along TPE involving vehicle registration numbers FBJ 9852Y and SJN 2524A driven by you at the material time of the accident. Our client was the owner and rider of FBJ 9852Y 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 SJN 2524A.

As a result of the accident, FBJ 9852Y 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 (till to-date)	\$	330.00
b) Medical / consultation expenses (and continuing)	\$	1,402.26
c) Cost of repairs (lump sum)	\$	4,450.00
d) Loss of use for 7 days (5+2 days PRI) @ \$50.00 per day	\$	350.00
e) Damage to personal belongings (no receipts)	\$	200.00

B. General Damages

1) Pain and suffering

Brief description of injuries:

a) Fracture of the left foot (5 th metatarsal)	\$	15,000.00
b) Acute chronic partial tear of the ulnar attachments of the triangular fibrocartilage complex	\$	12,000.00
c) Stable dorsal subluxation of ulna head at the distal radioulnar joint, with chronic tear of the volar ligament	\$	12,000.00
d) Whiplash injury	\$	6,000.00
e) Multiple abrasions over the left hip, buttock and calf, right thigh, right shoulder, both knees, elbows and hands	\$	8,000.00

C. Disbursements

a) Medical report fees (\$110.00 + \$100.00 + \$210.00 + \$180.00)	\$	600.00
b) Search & report fees / LTA / GIA / TP	\$	84.49
c) Automobile survey fee	\$	559.00
d) PT's fee	\$	225.00

D. Legal cost (at this stage) + GST \$ 3,240.00

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

- Two (2) traffic police reports lodged by our client & the driver of SJN 2524A;
- Two (2) GIA reports with sketch plan lodged by our client & the driver of SJN 2524A;

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- c) First information report from Traffic Police;
 - d) LTA search result with receipt;
 - e) Medical report and receipt from Changi General Hospital;
 - f) Medical report and receipt from Tan Tock Seng Hospital;
 - g) Specialist medical report and receipt from Changi General Hospital;
 - h) Referral letter from Tan Tock Seng Hospital;
 - i) Memo from Tan Tock Seng Hospital;
 - j) Specialist & MRI reports with receipt from Tan Tock Seng Hospital;
 - k) Tax invoices for medical expenses amounting to \$1,402.26;
 - l) Six (6) medical certificates issued in respect of our client;
 - m) Invoice from Speedy Motor Cycle Service Centre;
 - n) Survey report and invoice from Lee Appraisal Services;
 - o) Tax invoice / receipts for GIA / TP search & report fees;
 - p) Colour photographs depicting the injuries sustained;
 - q) Photographs of the damaged properties;
 - r) Copy of email from JusEquity Law Corporation to AXA Insurance Singapore Pte Ltd; and
 - s) Fifty-nine (59) colour photographs depicting the damages sustained by FBJ 9852Y.

In compliance with the pre-action protocol under State Courts' Practice Directions 2021 r/w RoC 21, we propose using one of the following medical experts as a single joint expert:-

- i) Dr. Pravin Thiruchelvam from Changi General Hospital;
- ii) Prof. Lim Kok Ren from Changi General Hospital; and
- iii) Dr. Sreedharan Sechachalam from Tan Tock Seng Hospital.

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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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