To,

The Cholamandalam MS General Insurance Company Limited,

Registered and Head Office,

2nd Floor, Dare House,

2 NSC Bose Road,

Chennai-600001,

Tamil Nadu

The Cholamandalam MS General Insurance Company Limited,

Branch Office, H.No 40-1-48/1, 2nd Floor,

Beside Centro, Opp Airtel Office,

Near DV Manor Hotel, MG Road,

Vijayawada-520010, Krishna (Dist),

Andhra Pradesh

Cholamandalam MS General Insurance Company Limited,

D. No 26-1-19, Opp MSR High Tech

Bus Stand Kambala Peta,

Rajahmundry- 533103, East Godavari Dist,

Andhra Pradesh

Subject: Legal Notice for Deficiency of Service and Claim for Insurance

Dear Sir/Madam,

I, Nammi Venkata Rao, S/o Late Ramulu, aged 47 years, residing at D. No 9-40-22, Nammivanipeta, Chittivalasa Post, Bheemunipatnam Mandal, Visakhapatnam District- 531162, do hereby issue this Legal Notice to you regarding the deficiency of service and repudiation of my insurance claim.

This is to bring to your kind notice that I have approached you for purchasing an insurance policy for his vehicle, TATA Ace bearing Registration No AP 31 TP 4183, for a sum of Rs.3,20,000. The policy type purchased was Goods Carrying Vehicle, with the policy period from 26/10/2019 to 25/10/2020 vide Policy Number (3379/02530876/000/00).

That on 20/02/2020, I was traveling in the said vehicle carrying paddy bags and dry grass. An accident occurred where the vehicle caught fire due to electric wires touching the load, resulting in complete damage to the vehicle and the goods it carried. That I promptly reported the accident to the relevant authorities and filed an FIR with the Bhogapuram Police Station (Crime No.29/2000 dated 22/02/2020).

That subsequently, when I approached you to claim insurance benefits and duly submitted all required documents, including the FIR copy, Fire Attendance Certificate, M.V. Inspector’s Report, Photographs of the Accident, Insurance Policy, Vehicle Registration Certificate, Driving License, Aadhar Card, and Estimate of Damages. Though I have fulfilled all the necessary formalities, you have repudiated the claim through a letter dated 03/04/2020, citing the presence of three persons in the vehicle at the time of the accident as grounds for denial.

That on account of your aforesaid dereliction of duty and failure and neglect to rectify the same I have suffered losses of Rs.30,000 per month from the date of accident. That I have no other means of livelihood and have been facing financial distress. Thus I am issuing a legal notice to which you are liable to compensate me in the following manner:

* Payment of Rs.5,85,762/- towards estimated damages for the vehicle.
* Payment of Rs.3,60,000/- towards loss of earnings from March 2020 to February 2021.
* Payment of interest at the rate of 24% p.a. on the total amount from the date of the accident till realization.
* Payment of Rs.10,000/- towards damages of the goods in the vehicle.
* Payment of Rs.10,000/- towards the charges for Legal Notice.
* Payment of Rs.2,00,000/- towards Compensation.
* Payment of Rs.1,00,000/- towards costs of the Complainant.

That I shall reserve the right to seek any other relief deemed fit by the Hon'ble Forum in the interest of justice.

That you are required to comply with the notice within 7 days of the receipt of this notice failing which I shall be constrained to initiate against you for redressal of my aforesaid grievances and recovery of the aforesaid amount such proceedings, both civil and criminal as are warranted by law, besides filing a complaint under the statutory provisions of The Consumer Protection Act, 2019 exclusively at your own risk, cost, responsibility and consequences which please note.

Yours faithfully

Nammi Venkata Rao