

SUPER LAW CHAMBERS

ADVOCATES & SOLICITORS
UEN NO. 50218752D

101 Chin Seng Road
#02-06 Manhattan Tower
Singapore 162876
Tel: 6822 3320
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Your ref :

Our ref : ALC(L)2021.301.LMX.na

21 May 2021

NTUC Income Insurance Co-Operative Ltd
73 Bras Basah Road
#05-01 NTUC Trade Union House
Singapore 189556
Attn: Manager/Motor Claims Department

WITHOUT PREJUDICE

BY HAND

Dear Sirs,

**ACCIDENT ON 03.04.21 ALONG BRADDELL ROAD INVOLVING RIDER (JTR 3180)
AND SJN6520H**

We act for **LIM MING XUNG**, the rider of motor cycle **JTR 3180**, involved in the captioned accident.

We are instructed by our client, to claim damages, on his behalf, in connection with a road traffic accident on **03.04.21** along **BRADDELL ROAD** involving rider in a motor cycle **JTR 3180** and motor vehicle **SJN6520H**, driven by your insured, at the material time.

We are instructed that the accident was caused by you/your insured's negligence and/or contributory negligence in driving and management of motor vehicle **SJN6520H**. As a result of the accident, our client has sustained injuries, suffered pain and has been put to loss and expenses.

We hereby, in compliance with the PIMA protocol and Subordinate Court e-Practice Directions No. 2 of 2011, give notice, of our client's intention to claim damages for personal injuries and consequential loss and expenses suffered by him, against your insured, the driver of motor vehicle **SJN6520H**, for his negligence and/or contributory negligence in driving, use and management of motor vehicle **SJN6520H** at the material time, and, if necessary, to commence legal action against your insured driver for the same.

We, also, in compliance with the PIMA protocol and Subordinate Court e-Practice Directions No. 2 of 2011 (Para2.2) set-out the quantification of our client's claim herein as follows subject to further medical reports, medical receipts:-

1. **General Damages**
 - a) Pain & Suffering \$ 6,000.00
 - Loss of earning capacity
Loss of earning capacity \$to be assessed
2. **Special Damages**
 - a) Medical expenses \$ 96.30
 - b) Transport expenses \$ 40.00

Please kindly note, that the above quantification is made on a without prejudice basis and we reserve our client's rights to re-quantify his claim.

Police Investigation:

- Not Available at this moment

We, also, in compliance with PIMA protocol and Subordinate Court e-Practice Directions No. 2 of 2011 (Para 2.4), forward copies of the following documents for your perusal and considerations: -

List of Documents

No.	Date	Description
1.	03.04.21	Medical certificate
2.	03.04.21	Medical tax invoices
3.	03.04.21	Police report
4.	30.04.21	LTA search
5.	15.05.21	Medical report

In compliance with the pre-action protocol under the State Courts' Practice Direction 38, we propose using one of the following medical experts as a single joint expert:

Name of Medical Expert	Specialty
1. Dr. Ryan Teoh	Medical Officer, Mount Alvernia Hospital

We also take this opportunity to remind you that in compliance with para 3.6 of Subordinate Court e-Practice Directions No. 2 of 2011, your good office shall, within, **eight (8) weeks** from the date hereof:

- a) Reply to us indicating whether you intend to defend our client's claim herein and provide us the reason for doing so;
 - b) State your position taken on liability and quantum with supporting documents; and
-

c) Provide us all documents in relevance to our client's claim herein and your client's defence, particularly, the following:-

- GIA reports/Police reports, together with type-written transcripts of persons involved in the accident;
- Traffic investigation report;
- Police sketch plan;
- Vehicle damage report;
- Original, colored copies of photographs of damages to vehicles;
- Original, colored copies of photographs of scene of accident;
- Coroner's Enquiry Report, if applicable;
- Name of all witnesses;
- Statement of witnesses;
- Video footage of accident.

Please kindly note that we reserve our client's rights to request for cost sanctions, if the above is not complied with.

In view of an amicable settlement at this stage of the intended proceedings, we render below a list of disbursements incurred:-

Disbursements incurred as to date:

a)	Medical report fee	\$ 174.40
b)	LTA search fee	\$ 7.49
c)	Incidentals	\$ 100.00

Yours faithfully,

M/S SUPER LAW CHAMBERS
Enc



20 MAY 2021

Our Ref: MAH/MR/20210505/0118

Your Ref: ALC(L)2021.301.LMX.na

Dated: Saturday, May 15, 2021

Super Law Chambers
101 Chin Seng Road
#02-06 Manhattan Tower
Singapore 162876

Dear Sir/Madam,

RE: Medical Report of LIM MING XUNG (F1356629P)

MEDICAL REPORT

Dear Sir/Madam,

According to our medical records LIM MING XUNG was the unfortunate victim of a road traffic accident which occurred on the 3 April 2021 at 1445 hrs. Whilst riding his motorcycle, he was hit by a car from the right side.

There was no loss of consciousness, headache or vomiting. However there was no significant forward impact to the head, or retrograde amnesia. However, he did complain of pain over his neck and lower back.

He subsequently visited our 24-hour Mount Alvernia Hospital Clinic for a medical consult on 3 April 2021 at 1740 hrs. Physical examination revealed no lacerations, abrasions or scars. There was no tenderness elicited over the paraspinal neck muscles, and there was normal range of motion of flexion and extension of his neck. Lateral rotation of his neck was also normal. There were no abnormalities or deformities in the shoulder joint and spine. In addition, there were no other signs of head injury as he was conversant and conscious throughout the consult. Gait was also normal. There was no loss of power or sensation. Lumbar movement was full.

The patient was thereafter counselled and given appropriate advice to monitor his symptoms and to return to the clinic should he experience further headache, pain, or change in vision. Radiographic images would then be done at this point.

The diagnosis was lower back (muscle) strain.

He was prescribed Anarex, Arcoxia and Ketoprofen Plaster for pain relief, and given 5 days of outpatient medical leave from the 3 April 2021 to 7 April 2021.

Sincerely,
Dr. Ryan Teoh
MBBS (Australia)

24HR WALK-IN CLINIC/EMERGENCY DEPT

820 THOMSON ROAD SINGAPORE 574623



**SINGAPORE
POLICE FORCE**



T/20210403/1897

Police Station Of Origin:
Ang Mo Kio South N.P.C
81 Ang Mo Kio Avenue 3 SINGAPORE
569929
Tel No: 1800-4519999

1 of 4

Report No. T/20210403/1897

REPORT OF A TRAFFIC ACCIDENT

Date/Time Report Made: 03/04/2021 15:22		Vide Report No.:		Station Diary No.: 63	
Informant's Particulars					
Name of Informant: LIM MING XUNG			Address: BLK 120 ANG MO KIO AVENUE 2 #11-109 SINGAPORE 560120		
ID Type / ID No.: FIN NO / F1356629P			Contact No.: Home/Office: Mobile: 84486655		
Nationality: MALAYSIAN			Email:		
Sex: Male	Age: 34	Date of Birth: 01/04/1986	Type of Informant: Rider		
Race: Chinese			Language:		Institution / School Name:
Occupation: WORKSHOP ENGINEER			Driving Licence Information: Class: Date of Expiry:		

General Information of the Accident

Type of Accident:	Injury Foreign Vehicle	Drink Drive: No	Date/Time of Accident: 03/04/2021 14:50	Type of Location: Flyover
Location: BRADDELL ROAD				
Weather: Clear		Road Surface: Dry		Road Speed Limit:
Traffic Flow:		Traffic Control: Not Controlled		Traffic Volume: Moderate
Type of Collision: Between Moving Vehicles - Side Swipe - Same Direction				Anyone conveyed by ambulance: No

Details of Vehicle Involved

Vehicle No.	Type	Make	Model	Color	Condition	No of Passenger
JTR3180	Motorcycle	YAMAHA	X-Max	Silver	Slightly Damaged	1
SJN6520H	Car	PERODUA	VIVA ELITE EZ AT 2WD 5DR	Blue	Slightly Damaged	1

Details of Person Involved

Any Pedestrian Involved: No	
No. of Pedestrians Injured: NIL	Use of Pedestrian Crossing: NA



**SINGAPORE
POLICE FORCE**



T/20210403/1897

2 of 4

Police Station Of Origin:
Ang Mo Kio South N.P.C
81 Ang Mo Kio Avenue 3 SINGAPORE
569929
Tel No: 1800-4519999

Report No. T/20210403/1897

CONTINUATION OF REPORT

Pillion			
Name	Ong Hao Eng	ID No.	F7122356L
Related Vehicle	JTR3180 (Motorcycle)	Contact No.	93324114
Hospital/Clinic	NIL	Class of Driving Licence & Expiry Date	Class: NIL Date of Expiry: NIL
Date Treatment	NIL	Date Discharge	NIL
No. of Days granted Medical Leave	NIL	Degree of Injury	Slight
Rider			
Name	LIM MING XUNG	ID No.	F1356629P
Related Vehicle	JTR3180 (Motorcycle)	Contact No.	84486655
Hospital/Clinic	NIL	Class of Driving Licence & Expiry Date	Class: NIL Date of Expiry: NIL
Date Treatment	NIL	Date Discharge	NIL
No. of Days granted Medical Leave	NIL	Degree of Injury	NIL
Driver			
Name	George Tan	ID No.	S9022682A
Related Vehicle	SJN6520H (Car)	Contact No.	82998655
Hospital/Clinic	NIL	Class of Driving Licence & Expiry Date	Class: NIL Date of Expiry: NIL
Date Treatment	NIL	Date Discharge	NIL
No. of Days granted Medical Leave	NIL	Degree of Injury	NIL

Brief Details.

On 03/04/2021 at about 1448hrs, I was riding my motorcycle bearing plate no. JTR3180 along CTE towards Braddell Road on the left lane of a 2 lane road. Suddenly, I felt an impact and I stopped my motorbike. A car bearing plate no. SJN6520H stopped behind me and we exchanged particulars. My pillion's right leg and feet were slightly injured as the car changed lane and had side swipe me. The car's bumper also came off.

I am lodging this report for insurance purposes.