

**IN THE GENERAL DIVISION OF  
THE HIGH COURT OF THE REPUBLIC OF SINGAPORE**

**[2025] SGHC 214**

Originating Application No 616 of 2025 (Summons No 2122 of 2025)

Between

Landscape Engineering Pte Ltd

*... Claimant*

And

- (1) Dot Safety Solutions Pte Ltd
- (2) Kumarandy Alaguraj

*... Respondents*

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**GROUNDINGS OF DECISION**

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[Civil Procedure — Parties — Self-representation of company]

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**Landscape Engineering Pte Ltd**  
**v**  
**Dot Safety Solutions Pte Ltd and another**

**[2025] SGHC 214**

General Division of the High Court — Originating Application No 616 of 2025 (Summons No 2122 of 2025)

Kwek Mean Luck J

15 October 2025

30 October 2025

**Kwek Mean Luck J:**

**Introduction**

1 In HC/SUM 2122/2025 (“SUM 2122”), filed in HC/OA/616/2025 (“OA 616”), Mr Kumarandy Alaguraj (“Mr Alaguraj”) and Dot Safety Solutions Pte Ltd (“Dot”) applied for permission for Mr Alaguraj to act on behalf of Dot in proceedings brought by the claimant, Landscape Engineering Pte Ltd (“Landscape”), in OA 616. I allowed the application.

2 A key issue which arose was the interpretation of O 4 r 3(3)(b) of the Rules of Court 2021 (“ROC 2021”), which governs such applications. Order 4 rule 3(3)(b) requires consideration of whether the officer has “sufficient executive or administrative capacity or is a proper person to represent the company” in that matter. Landscape, in reliance on certain authorities, submitted that under O 4 r 3(3)(b), there is no consideration of the role that the

officer plays within the company. I was unable to agree. In my view, there are clearly two distinct and disjunctive elements which should be construed separately. I set out in full my reasons below, together with my assessment of Landscape’s other submissions.

### **Background in OA 616**

3 In OA 616, the claimant, Landscape, applies to restrain the first respondent, Dot, and the second respondent, Mr Alaguraj, from commencing any court action or making any application relating to DC/OC 1760/2023 (“OC 1760”) without the permission of the Court. Landscape also seeks to stay or discontinue all ongoing proceedings brought by Dot and Mr Alaguraj in relation to OC 1760 in the State Courts.

4 Landscape leased a property (the “Premises”) to Dot from 2022 to 2023.<sup>1</sup> Landscape brought OC 1760, claiming that Dot refused to pay rent for March 2023 to June 2023 and failed to deliver up possession of the Premises on expiry of the lease.<sup>2</sup> Landscape obtained summary judgment in its favour.<sup>3</sup> After Dot’s appeal against the summary judgment was dismissed, Landscape proceeded with enforcement proceedings.<sup>4</sup> Landscape avers that Dot has made a series of unmeritorious applications that have been dismissed with costs. Such costs are unpaid. It hence took up OA 616.<sup>5</sup>

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<sup>1</sup> 1st Affidavit of B Gurumurthy dated 17 June 2025 (Gurumurthy’s 1st affidavit”) at para 5.

<sup>2</sup> Gurumurthy’s 1st affidavit at paras 7–8.

<sup>3</sup> Gurumurthy’s 1st affidavit at para 12.

<sup>4</sup> Gurumurthy’s 1st affidavit at paras 17–18.

<sup>5</sup> Gurumurthy’s 1st affidavit at paras 20–25.

**SUM 2122**

***Dot and Mr Alaguraj’s case***

5 SUM 2122 is Dot and Mr Alaguraj’s application for Mr Alaguraj, the director of Dot, to represent Dot in all court proceedings.

6 Dot and Mr Alaguraj submitted that Landscape’s allegation of abuse of process based on the chronology of unsuccessful applications made by Dot, is not justified.<sup>6</sup> Each application was filed on a good faith belief that it had legal basis, even if the court ultimately disagreed. Mr Alaguraj is a layperson navigating a complex legal system.<sup>7</sup> The inability to pay the costs orders is a result of the company’s financial hardship. To deny the director permission to represent the company when it cannot afford a lawyer, would be a denial of justice. In so far as Landscape alleged that Dot is an empty shell, that reflects genuine financial difficulties and is why Mr Alaguraj must represent Dot.<sup>8</sup>

7 The two incidents referred to by Landscape – an eLitigation filing issue and a missed case conference – are not reflective of Mr Alaguraj’s lack of competence and credibility.<sup>9</sup> Mr Alaguraj emailed a document instead of filing it, on the advice of the court-appointed service provider.<sup>10</sup> He missed an earlier case conference because of a technical issue with his phone/email notification system.<sup>11</sup> This was an isolated incident.

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<sup>6</sup> Written Submissions on behalf of the 1st and 2nd Respondents dated 8 October 2025 (“RWS”) at para 2.

<sup>7</sup> RWS at para 16.

<sup>8</sup> RWS at paras 20–21.

<sup>9</sup> RWS at para 22.

<sup>10</sup> RWS at para 23.

<sup>11</sup> RWS at para 24.

***Landscape’s case***

8 Landscape submitted, relying on *Lin Yueh Hung v Andreas Vogel & Partner, Rechtsanwaelte AV & P Legal LLP* [2024] 3 SLR 1020 (“*Lin Yueh Hung*”) at [23], that under O 4 r 3(3)(b), the focus is on the characterisation and abilities of the officer in question.<sup>12</sup> In the hearing, counsel for Landscape took the position that the role that the officer plays in the company is not a relevant consideration.

9 Further, there is a broader policy concern articulated in *Bulk Trading SA v Pevensey Pte Ltd* [2015] 1 SLR 538 (“*Bulk Trading*”) at [28], that as a result of the doctrine of limited liability, those who litigate with companies are in a disadvantaged position as the company may not be able to compensate them.<sup>13</sup> The constraints in O 4 r 3(3) thus exist to ensure that impecunious companies do not become convenient vehicles for vexatious litigation.<sup>14</sup> An impecunious company controlled by a director who persistently files meritless applications, as in the present case, should not be given a procedural advantage to litigate without counsel, shielded from costs responsibility.<sup>15</sup>

10 In this case, there is no evidence that Mr Alaguraj is a duly authorised officer of Dot.<sup>16</sup> Mr Alaguraj’s conduct shows that he lacks the competence, impartiality, and procedural discipline expected of a “proper person”. His repeated procedural defaults and disregard of court directions demonstrate that

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<sup>12</sup> Claimant’s Submissions against HC/SUM 2122/2025 dated 8 October 2025 (“CWS”) at para 5.3.

<sup>13</sup> CWS at para 7.

<sup>14</sup> CWS at paras 9–10.

<sup>15</sup> CWS at para 13.

<sup>16</sup> CWS at paras 16–18.

he cannot represent the company fairly or responsibly.<sup>17</sup> He has shown a consistent inability to comply with basic court procedure.<sup>18</sup> He has abused the court’s process through repeated, meritless applications.<sup>19</sup> His conduct also reveals a complete lack of administrative and executive competence.<sup>20</sup>

***Decision***

11 Order 4 rule 3 of the ROC 2021 provides that:

**Representation by solicitor, etc. (O. 4, r. 3)**

**3.— ...**

(3) ... the Court may, on an application by a company ... give permission for an officer of the company ... to act on behalf of the company ... if the Court is satisfied that —

(a) the officer has been duly authorised by the company, ... to act on behalf of the company ... in that matter or proceeding; and

(b) the officer has sufficient executive or administrative capacity or is a proper person to represent the company ... in that matter or proceeding.

...

(6) In this Rule —

...

“officer” —

(a) in relation to a company ... means any director or secretary of the company ... or a person employed in an executive capacity by the company...

...

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<sup>17</sup> CWS at para 19.

<sup>18</sup> CWS at para 20.

<sup>19</sup> CWS at para 22.

<sup>20</sup> CWS at para 24.

12 In respect of the first requirement under O 4 r 3(3)(a), I note that Landscape has adduced an ACRA search of Dot as of 29 July 2024, which shows that Mr Alaguraj is the sole director, sole shareholder and Chief Executive Officer of Dot.<sup>21</sup> At the hearing, Mr Alaguraj produced a warrant to act, signed by him, authorising him as sole director and shareholder of Dot, to act on behalf of Dot in respect of OA 616 and OC 1760. I hence found that Mr Alaguraj has been duly authorised by Dot to act on behalf of Dot in OA 616 and satisfies O 4 r 3(3)(a).

13 In respect of the second requirement under O 4 r 3(3)(b), there are two disjunctive elements. I note that in *Lin Yueh Hung* at [23], there is obiter dicta from Goh Yihan JC (as he then was) suggesting that the test in O 4 r (3)(3)(b) puts the focus of the analysis on the characterisation and abilities of the officer in question. Landscape relies on *Lin Yueh Hung* to support its case that under O 4 r 3(3)(b), there is no consideration of the role that an officer plays in the company.

14 The obiter dicta in *Lin Yueh Hong* at [23] was made in the context of the learned judge agreeing with *Singapore Rules of Court: A Practice Guide* (Chua Lee Ming gen ed) (Academy Publishing, 2023) (“*Singapore Rules of Court: A Practice Guide*”) at pp 42–43. There, the learned authors stated:

The test of “appropriateness” has now been replaced by a disjunctive assessment of whether the officer “has sufficient executive or administrative capacity or is a proper person to represent the entity”. This puts the focus of the analysis on the characteristics and abilities of the officer in question; and the relevance of factors previously identified will have to be evaluated in this light.

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<sup>21</sup> See Gurumurthy’s 1st affidavit at Tab 10 pp 212–213.

15 From the above excerpt from *Singapore Rules of Court: A Practice Guide*, it is clear that the learned authors were contrasting the disjunctive elements in O 4 r 3(3)(b) of the ROC 2021 with the test of “appropriateness” under the equivalent provision in the Rules of Court 2014 (“ROC 2014”). The learned authors were merely making the general observation that the new focus of analysis is on the characteristics and abilities of the officer in question, as compared to the wide range of factors previously identified under the “appropriateness” test. This observation was premised on the plain language of O 4 r 3(3)(b) which sets out two disjunctive elements – first, whether the officer has sufficient executive or administrative capacity, or, second, whether the officer is a proper person to represent the entity.

16 In my view, the learned authors were simply remarking that these two disjunctive elements could be said to broadly relate to an officer’s characteristics and abilities. I do not think that either the learned authors or Goh JC in *Lin Yueh Hung* were expressing a view that the two disjunctive elements were to be elided in favour of a broad inquiry as to an officer’s characteristics and abilities, to the exclusion of any consideration of the role that an officer plays in the company. Given the plain language of the rule, these two disjunctive elements must form the basis of any assessment under O 4 r 3(3)(b).

17 Landscape’s written submissions appeared to conflate these two disjunctive elements. Landscape’s main contention was that Mr Alaguraj was not a proper person as he lacked the “competence, impartiality and procedural discipline”,<sup>22</sup> although Landscape also argued that Mr Alaguraj’s lack of basic procedural discipline and understanding meant that he lacked the requisite

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<sup>22</sup> CWS at para 19.

administrative or executive capacity required to represent Dot.<sup>23</sup> Landscape also alleged that Mr Alaguraj’s conduct revealed a complete lack of administrative and executive competence.<sup>24</sup>

18 In my assessment, a distinction should be drawn between these two disjunctive elements. The first element is whether an officer has “sufficient executive or administrative capacity”. I note that this is distinct from executive or administrative “capability”. One plain meaning of capacity is the specified role or position of the officer.

19 At the hearing, counsel for Landscape contended that the meaning of “capacity” in O 4 r 3(3)(b) excludes this plain meaning and only refers to the ability or power to do or understand something, such as an officer’s competency to represent the company in legal proceedings. However, counsel was unable to provide any reason why the plain meaning of the word should be ignored. I did not agree with this submission, particularly because “capacity” in this case is prefaced by the adjectives “executive or administrative”. Read in this context, the term “sufficient executive or administrative capacity” in O 4 r 3(3)(b) refers to the officer’s role and position in the company. I further note that in O 4 r 3(6), which defines “officer”, “capacity” is also used in a similar vein, referencing whether someone is “employed in an executive capacity by the company”. There is also no duplication between O 4 r 3(6) and O 4 r 3(3)(b), if the term “capacity” is given the same meaning throughout O 4 r 3. A secretary of the company could be an officer of the company, by virtue of the definition under O 4 r 3(6). It would nevertheless be relevant to such applications, to consider if that person has “sufficient executive or administrative capacity”, and assess if

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<sup>23</sup> CWS at para 21.

<sup>24</sup> CWS at para 24.

that person sufficiently understands the work or operations of the company, to serve as its representative in the proceedings.

20 It may be that the learned authors of *Singapore Rules of Court: A Practice Guide* also had in mind the role that a person plays in the company, when they referred to the “characteristics” of the officer in question.

21 In this case, given that Mr Alaguraj is the sole shareholder, sole director and Chief Executive Officer of the company, I found that he is an officer with “sufficient executive or administrative capacity” for the purposes of O 4 r 3(3)(b).

22 The second disjunctive element under O 4 r 3(3)(b) is that the officer “is a proper person to represent the company”. This would focus more on the abilities of the officer in question *vis-à-vis* the management of the legal proceeding at hand. Here, Landscape’s contentions as to Mr Alaguraj’s competence and conduct would be germane. However, given that I have found that Mr Alaguraj is an officer with sufficient executive or administrative capacity, I do not need to consider whether he is a proper person to represent the company, for the purpose of O 4 r 3(3)(b).

23 However, this does not mean that the issue of Mr Alaguraj’s competence is consequently irrelevant to the overall consideration of SUM 2122.

24 Beyond the conditions under O 4 rr 3(3)(a) and (b), the court also has a wider discretion to consider other factors that may be germane to the inquiry. As Professor Jeffrey Pinsler SC notes in *Singapore Court Practice* (Jeffrey Pinsler gen ed) (LexisNexis Singapore, 2025) at para 4.3.4:

...

The significance of condition (b) is that it is much more specific than the requirement in O 1 r 9(2)(b) and (3)(b) of the RoC 2014 that it was ‘appropriate’ permit the officer to represent the company. The term ‘appropriate’ was wide enough to enable the court to consider any circumstances in exercising its discretion. The question that arises under the current rules is whether the court’s discretion is circumscribed by the two conditions in (a) and (b) (above). For example, what if the officer is duly authorised by the entity and has sufficient capacity or is a ‘proper person’ to represent the entity but the complexity of the legal issues demands professional legal representation? It is submitted that the discretion is not limited to the grounds in (a) and (b) because the words **‘the court may’** (as opposed to ‘the court shall’) in O 4 r 3(3) and (4) **provide the court with the discretion to dismiss the application for representation by an officer if the court believes that the entity ought to be legally represented.**

...

[emphasis added]

25 At the same time, given the substantive restructuring of O 4 r 3(3) from the earlier equivalent provision in ROC 2014, the question arises as to when it would be appropriate for the court to take cognisance of other factors. In *Lin Yueh Hung*, the court expressed the view that “given the oft-cited sentiment that rules of procedure should never stand in the way of substantive justice, as broadly embodied in the Ideals found in O 3 r 1 of the ROC 2021”, the court is not prohibited from assessing other factors unrelated to the characterisation and abilities of the officer in question, although there needs to be a “very good reason” for a court to take these “extraneous” factors into account in considering an application under O 4 r 3(3); at [25],

26 It appears that this view was expressed in the context of the reframed substantive requirements in O 4 r 3(3)(b), and the court’s attention was not drawn to the words “the court may”, which expressly confers the court with the discretion to decline to grant an application, even if O 4 rr 3(3)(a) and (b) are satisfied.

27 In view of this, I would hesitate to go as far as in *Lin Yueh Hung* to say that there needs to be a “very good reason” to consider other factors. In my view, having regard to the structure of O 4 r 3(3), once an officer fulfils the requirements under O 4 r 3(3)(a) and (b), the court should ordinarily allow the officer to act on behalf of the entity *unless* the court finds *good reason* to exercise its discretion not to give permission.

28 In the exercise of this discretion, the court should have regard to the Ideals of the Rules of Court, as enumerated in O 3 r 1(2) of the ROC 2021. O 3 r 1(3) exhorts that the Court must seek to achieve the Ideals in all its orders or directions. As rightly observed in *Ghows LLC v Amber Compounding Pharmacy Pte Ltd* [2023] SGMC 43 at [25]–[26], to the extent that the factors enumerated in *Bulk Trading* (in reference to the test of “appropriateness” under the ROC 2014) seek to achieve the Ideals, the factors should continue to be relevant under the ROC 2021.

29 At this juncture, I summarise the legal principles set out in the analysis above:

- (a) There are two disjunctive elements in O 4 r 3(3)(b).
- (b) The first disjunctive element is whether the officer has “sufficient executive or administrative capacity”. This involves an assessment of the role that the officer plays in the entity, including whether that officer sufficiently understands the work or operations of the entity, to serve as its representative in the proceedings.
- (c) The second disjunctive element is whether the officer is a “proper person” to represent the entity. This involves an assessment of

the conduct, competence and abilities of the officer, *vis-à-vis* the management of the proceedings at hand.

(d) As O 4 r 3(3) states that the court “may” grant the application if satisfied as to O 4 rr 3(3)(a) and (b), the court may also consider other factors.

(e) Nevertheless, once an officer fulfils the requirements under O 4 rr 3(3)(a) and (b), the court should ordinarily allow the officer to act on behalf of the entity *unless* the court finds *good reason* to exercise its discretion not to.

30 I thus considered the other relevant *Bulk Trading* factors (which have been helpfully summarised in *Elbow Holdings Pte Ltd v Marina Bay Sands Pte Ltd* [2015] 5 SLR 289 at [7]), before situating them in light of the Ideals of the Rules of Court.

*Financial impecuniosity of the company*

31 First, I considered the financial impecuniosity of the company. The respondents have not provided evidence on the company’s financial state. However Landscape, in its affidavit, takes the position that Dot is impecunious.<sup>25</sup> In *Allergan, Inc v Ferlandz Nutra Pte Ltd* [2015] 2 SLR 94, the court noted at [52] that where financial impecuniosity is the sole or main reason for the application, the extent of the financial constraints on the company and the ability of the company to engage counsel would be a consideration. This factor, in so far as it relates to the ability of the company to engage counsel, weighed in Dot and Mr Alaguraj’s favour.

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<sup>25</sup> See Gurumurthy’s 1st affidavit at para 31.

32 Landscape contends that the impecuniosity of Dot also bears directly on abuse of process as the company has been used to pursue vexatious litigation.<sup>26</sup> This relates to a separate point of a possible abuse of process, which I examine below.

*Nature of the company's involvement*

33 Second, I considered the nature of the company's involvement. In *Bulk Trading*, Steven Chong J (as he then was) noted that a number of cases have suggested that the court should be more willing to grant leave, where the company is the defendant, since the company would effectively be before the court involuntarily; at [100]. The judge accepted that such an approach made sense; at [101]. As Dot is the respondent in OA 616, this weighed in Dot and Mr Alaguraj's favour.

34 Landscape also submitted, in reliance on comments made in *Bulk Trading* at [28] and [58], that limited companies, which may not be able to compensate parties who litigate with them, should be subject to certain constraints in the interests of their potential creditors. I accept the existence of this policy concern. However, the relevance of this policy concern is severely diminished in this case where Dot is the respondent in the originating application, responding (involuntarily) to an application brought by Landscape. In such circumstances, it cannot be said that Dot is exploiting the shield of limited liability in this proceeding without bearing real financial consequence or that it is weaponising its impecuniosity.

35 Furthermore, Mr Alaguraj is also a defendant in this proceeding. Even if permission is not granted, Mr Alaguraj would still be entitled to make

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<sup>26</sup> CWS at para 27.

arguments in his personal capacity that impinge on the case *vis-à-vis* Dot. In *Bulk Trading*, the court observed that it would be appropriate to grant leave if a common or substantially similar stand is adopted by the representative in his personal capacity as well as on behalf of the company; at [119]. This is likely to be the case in OA 616.

36 I also note that a grant of the summons for the purposes of OA 616, would not make significant difference in terms of costs to Landscape. There is no issue of increased costs. Furthermore, costs can be ordered jointly against Dot and Mr Alaguraj as they are both respondents in the proceeding. In that sense, there is no issue of a shield of limited liability. At the hearing, counsel for Landscape raised the possibility that Mr Alaguraj may procure Dot to appeal an unfavourable judgment while not appealing in his personal capacity, and thereby avoid costs orders against him personally in the appeal. I did not place much weight on this submission as first, it is speculative, and second, it would be open for Landscape to contend that the court ought to make an order of costs against Mr Alaguraj personally as a non-party to the appeal; see *DB Trustees (Hong Kong) Ltd v Consult Asia* [2010] 3 SLR 542 at [22]–[36].

37 Landscape further claimed that Dot and by extension Mr Alaguraj have repeatedly ignored costs orders or abused the court process in relation to OC 1760. While this may be germane to the determination of OA 616, I found that it is less relevant here, since it is Landscape that is bringing OA 616, invoking the court’s jurisdiction, and Dot is the party resisting Landscape’s application.

#### *Structure of the company*

38 Relatedly, the court in *Bulk Trading* noted that it should also be relevant that the proposed representative is the sole shareholder or is effectively the

embodiment of the company. In such a situation, the analogy of an individual litigant in person is particularly compelling; at [103]. In *Thomas Lamond v Ray Smith* [2004] O.J. No 3255 (“*Thomas Lamond*”), which *Bulk Trading* referred to at [103], the court noted that if the rationale was a concern over whether a representative has the authority to act for or bind the company and is sufficiently knowledgeable about its affairs, the rationale is weakened for a small one-man company; *Thomas Lamond* at [7]–[9].

*Competency and credibility of the proposed representative and the complexity of issues*

39 In *Bulk Trading*, the court held that the competence of a representative must be weighed in the context of the complexity of the issues and the quality of the representative; at [113]. The representative must also be able to understand and comply with court orders and directions; at [114]. In contrast, where a representative, *inter alia*, experiences language difficulties, it is difficult for him to attend or assist the court; at [115]. The representative should function effectively as *an officer of the court*; at [116].

40 In this case, Mr Alaguraj has relied on generative artificial intelligence (“AI”) to generate his submissions. In so doing, he has referred to no fewer than six fictitious cases. While Mr Alaguraj is not a solicitor and may not be aware of the pitfalls of artificial intelligence, this indicates a level of carelessness and raises doubts as to the quality of his representation and his ability to function as an officer of the court.

41 This is a very serious matter, which even a lay person should bear in mind. In a recent case, a solicitor was ordered by the court to pay costs personally, for referring to fictitious cases generated by AI, in view of the

wasted work this resulted for the opposing party; see *Tajudin bin Gulam Rasul v Suriaya bte Haja Mohideen* [2025] SGHCR 33.

42 I note that Mr Alaguraj appears to have persistently failed to comply with basic court procedure. He also has some language difficulties and requires a Tamil interpreter.

43 How much weight the above factors should hold, bearing in mind the nature of self-represented litigation, would be affected by the complexity of the legal process at hand. In *Bulk Trading*, the learned judge held that the court must necessarily consider whether the company representative would be able to offer assistance in the determination of the issues. This would require an examination of the issues at hand and whether the representative is sufficiently competent to understand and comply with the attendant obligations to such representation; at [105].

44 *Bulk Trading* related to a suit in which a series of interlocutory applications and procedures had to be undertaken, which weighed against the grant of permission; at [106]–[107]. In the present case, the primary issue is whether an extended civil restraint order should be granted under s 73C(1) of the Supreme Court of Judicature Act 1969 (2020 Rev Ed). There are two requirements: (a) the intended subject had to have persistently commenced actions or made applications; and (b) such actions or applications were totally without merit; *National University of Singapore v Ten Leu Jiun Jeanne-Marie* [2024] 3 SLR 864 at [46]. The main issue therefore would be whether the previous applications were without merit. This involves legal analysis of the past applications. This weighed against Mr Alaguraj. At the same time, it is less challenging than a complex trial process, and the merits of past applications could be assessed, where grounds are issued, from the decisions themselves.

*Underlying rationales and the Ideals of the Rules of Court*

45 In *Bulk Trading*, the court identified three rationales as to why a corporate litigant has to first seek permission of court before being able to represent itself in proceedings; at [47]:

1. The opposite party may be disadvantaged by the time and cost of the proceeding being extended due to the company not being represented by a legally qualified advocate.
2. The public interest in the efficient and timely administration of justice may be prejudiced by the time and cost of the proceeding being extended due to the company not being represented by a legally qualified advocate.
3. The public interest in the fair administration of justice may be prejudiced by the fact that a lay advocate (unlike a legally qualified advocate) does not owe a duty to the court and to the parties in the litigation to ensure that the court is properly informed and not misled.

46 As seen from the above rationales, one concern weighing against corporate self-representation is an undue extension of time and costs of the proceeding. This relates to the Ideals of expeditious proceedings and efficient use of court resources under O 3 r 1(2) of the ROC 2021.

47 In this case, as Mr Alaguraj himself would be self-represented in any event, allowing him to be a representative of Dot would not extend time and costs of the proceedings for Landscape. I accepted that the quality of assistance to the court would be reduced by lay representation through Mr Alaguraj. In my view, this is outweighed by the prejudice to the respondents if the summons were not allowed. Permitting Mr Alaguraj to represent Dot would be consistent with the Ideal of fair access to justice under the Rules of Court, without detracting from any of the other Ideals.

48 Thus, after considering the other factors, I did not find any good reason to exercise my discretion not to allow Mr Alaguraj to represent Dot.

**Conclusion**

49 For the reasons above, I allowed SUM 2122, but confined, for Mr Alaguraj to represent Dot in the company’s proceedings in OA 616, and not “in all Court’s Proceedings” as prayed for.

50 I cautioned Mr Alaguraj, that as this application progresses, if he continues to rely on AI to produce his submissions, he is to verify the authenticity of the AI’s output. If he persists in tendering fictitious authorities, there may be attendant consequences, including an adverse award of costs against him personally.

Kwek Mean Luck  
Judge of the High Court

Lim Muhammad Syafiq and Yap Wei Xuan Mendel (RHTLaw Asia  
LLP) for the claimant;  
The first and second respondents in person.

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