6. There have been at least 72 other class-action complaints filed in various United States District Courts around the country, by alleged owners or lessees of Toyota/Lexus vehicles, all asserting claims against Toyota entities, related to Toyota's voluntary safety recalls of Toyota and Lexus vehicles and/or alleged unintended acceleration of those vehicles.

7. At least four motions for coordinated treatment of these cases have been filed with the Judicial Panel on Multidistrict Litigation ("JPML"), seeking transfer and coordination into a MDL proceeding.

8. Given the strong likelihood that these cases will be transferred into a MDL, on February 21, 2010 Toyota filed an *ex parte* application for an immediate stay of all proceedings in this action, until after the JPML rules on consolidation. Judge Matz has already Ordered complete stays in two other related actions pending on his docket. True and correct copies of Judge Matz's stay Orders in those cases are attached hereto collectively as Exhibit B. Toyota still believes that its stay application in this case should be granted in its entirety.

9. On February 22, 2010, plaintiffs filed an opposition to Toyota's stay application. A true and correct copy of plaintiffs' opposition is attached hereto as Exhibit C. Plaintiffs opposed the stay request and expressed intent to file a remand motion, based on their improper and ineffective attempt to prevent removal by trying to dismiss the federal claims in state court before Toyota could remove the action. Plaintiffs' remand motion is due on March 19, 2010.

10. Plaintiffs represented to the Court, in their opposition, that they have no objections to Toyota receiving an extension of time to file motions to dismiss, and conceded that judicial economy would best be served by the Court hearing and determining the remand issue before considering and hearing motions to dismiss.

11. Given that the Court has not yet ruled on Toyota's stay application, and plaintiffs have represented that they do not oppose Toyota receiving an extension of time to file a responsive pleading, on February 23, 2010 my office contacted