to Plaintiff and the Plaintiff Class of all monies that have been expended by them which was obtained by Defendant's utilization of deceptive acts or practices.

COUNT IV
LOUISIANA PRODUCTS LIABILITY ACT

55. Plaintiff incorporates each of the preceding paragraphs as if fully set forth herein at length.

56. Alternatively, the product in question is unreasonably dangerous for the following reasons:

a. It is unreasonably dangerous in construction or composition as provided in R.S. 9:2800.55;

b. It is unreasonably dangerous in design as provided in R.S. 9:2800.56;

c. It is unreasonably dangerous because an adequate warning about the product was not provided as required by R.S. 9:2800.57;

d. It is unreasonably dangerous because it does not conform to an express warranty of the manufacturer about the product as provided in R.S. 9:2800.58.

57. The characteristics of the product that render it unreasonably dangerous under R.S. 9:2800.55, et seq., existed at the time the product left the control of the manufacturer or resulted from a reasonably anticipated alteration or modification of the product.

58. At all times material hereto, Toyota was engaged in the business of designing, manufacturing, assembling, promoting, advertising, selling, and distributing Toyota Vehicles in the United States, including but not limited to, the Subject Vehicles.