30. Plaintiff is unable to state the exact number of class members without discovery of the defendants' records; however, upon information and belief, and based upon published news reports, well over 4 million vehicles fall within the proposed class definition. It is estimated that the class will be composed of millions of individuals.

31. Plaintiff and the class members are claiming damages and injunctive relief based upon the misconduct alleged herein including the Toyota Defendants' manufacture and sale of vehicles with a risk of sudden unintended acceleration and the Toyota Defendants' deceptive and misleading conduct in failing to inform consumers of the scope and causes of that risk.

32. Additionally, no attorney would have the financial resources to litigate this case against opposition from Defendants where the potential recovery for Plaintiff and each class member is relatively small. Therefore, joinder of all similarly situated individuals is appropriate.

Predominance of Common Questions of Law and Fact

33. The claims asserted by Plaintiff on behalf of herself and all similarly situated class members present questions of fact or law common to the class, including, *inter alia*, whether defendants engaged in deceptive or unfair trade or business practices.

34. Questions of law or fact common to the members of the class predominate over questions affecting individual members. The common questions of law and fact include, but are not limited to, the following:

Questions of Fact:

a) Whether the Toyota Defendants have manufactured and sold vehicles with a risk of sudden unintended acceleration;