"the vehicle should be driven to the nearest safe location, the engine shut off, and a Toyota dealer contacted for assistance."

4. As of the filing of this complaint, the Toyota Defendants have not announced a permanent fix for any of the Recalled Vehicles. The Toyota Defendants have made no effort to provide affected consumers with any alternative means of transportation while a permanent fix is being developed or during the time it takes for any repairs recommended by the Toyota Defendants to be completed.

THE PARTIES

5. Plaintiff is an individual currently residing in Safety Harbor, Pinellas County, Florida, who purchased a 2006 Toyota Avalon in April of 2006.

6. Toyota Motor Corporation is, and at all relevant times was, a Japanese corporation with its headquarters in Toyota City, Aichi Prefecture, Japan, which conducts and transacts business within this Judicial District.

7. Toyota Motor Sales, U.S.A. is, and at all relevant times was, a California corporation with its principal place of business in Torrance, California, which conducts and transacts business within this Judicial District.

8. The above-named Defendants are collectively referred to as the "Toyota Defendants."

JURISDICTION AND VENUE

9. This Court has jurisdiction pursuant to 28 U.S.C. § 1332 (a) (1) and (d). There is diversity of citizenship, the case is filed as a class action, the matter in controversy exceeds the value of $5,000,000, exclusive of interest and costs, and more than two-thirds of the members of the proposed class are citizens of a state different than defendant. In addition, the amount in