71. The Toyota Defendants engaged in wrongful conduct while at the same time obtaining, under false pretenses, significant sums of money from Plaintiffs and all other Toyota car buyers.

72. Plaintiffs and the other Toyota car buyers were deceived by the Toyota Defendants' actions.

73. The Toyota Defendants sold, marketed, advertised, distributed, and otherwise placed Toyota vehicles that they knew or should have known were dangerous into the stream of commerce.

74. This claim is brought pursuant to S.C. Code Ann. § 56-15-110(2) for the benefit of the whole because the action is one of common or general interests to many persons and the parties are numerous and it is impracticable to bring them all before the Court.

75. Accordingly, Plaintiff is suing for the benefit of all South Carolina Toyota care buyers.

76. Plaintiff and all other South Carolina Toyota car buyers have been injured by the Toyota Defendants' acts as described above.

77. As a result of the conduct of the Toyota Defendants, Plaintiff and the group she represents are entitled to double actual damages, the costs of the suit, and a reasonable attorney's fee pursuant to S.C. Code Ann. § 56-15-110(1).

78. Further, the conduct of the Toyota Defendants was malicious, and Plaintiff and the group she represents are therefore entitled to punitive damages in the amount of three times the amount of actual damages pursuant to S.C. Code Ann. §56-15-110(3).