30. Plaintiff did not learn of the vehicle's unique propensity for runaway acceleration, or that Toyota failed to provide adequate failsafes until after Toyota issued a safety warning regarding the floor mats in certain Toyota vehicles.

31. As a consequence of Defendants' unlawful and misleading business practices, Plaintiff has suffered harm which includes being deprived of the full use, benefit, and value of their vehicles.

32. Plaintiff appears in this action on behalf of herself and on behalf of all others similarly situated.

FACTS COMMON TO ALL CLAIMS FOR RELIEF

33. Toyota vehicles containing the ETCS-i system have been purchased throughout South Carolina, and are in wide use on South Carolina roads.

34. Consumers purchasing a Toyota vehicle containing the ETCS-i are not informed of the heightened propensity for runaway acceleration in ETCS-i-equipped vehicles. Nor are they informed that neither Toyota nor Denso incorporate an adequate electronic or mechanical failsafe into its design.

35. Toyota and Denso had actual knowledge that ETCS-i-equipped vehicles, as currently designed and manufactured, are unreasonably dangerous to a person who can be expected to them.

36. ETCS-i-equipped vehicles are unreasonably dangerous due to the following acts and omissions by the Defendants:

> a. On the part of each Defendant, failure properly and adequately to design the Class Vehicles and the systems, components, and parts thereof, including, but not limited to, the electronic engine control, the cruise control and other components of the Engine Control Module, collectively denominated by the Toyota entities as the Electronic