58. Plaintiff and the Class unknowingly conferred a benefit upon Defendants by paying for vehicles which were in fact, unreasonably dangerous for use as public transportation.

59. The circumstances, as described in this Complaint, are such that allowing the Defendants to retain all of the benefits provided by Plaintiff and the Class would be inequitable.

60. The Defendants have been unjustly enriched at the expense of Plaintiff and the Class and, as a matter of equity, the Defendants should be required to make Plaintiff and the Class whole in an amount to be proven at trial.

FOURTH CLAIM FOR RELIEF
(Violations of S.C. Code Ann. § 56-15-10, et seq.)
(Against the Toyota Defendants only)

61. Plaintiff realleges and incorporates by reference all preceding paragraphs as if fully set forth verbatim herein.

62. The Toyota Defendants are manufacturers and distributors subject to Title 56 of the South Carolina Code.

63. S.C. Code § 56-15-30 states that unfair methods of competition and unfair or deceptive acts or practices are unlawful.

64. S.C. Code §56-15-40(1) states that it is unlawful for "any manufacturer, factory branch, factory representative, distributor, or wholesaler, distributor branch, distributor representative or motor vehicle dealer to engage in any action which is arbitrary, in bad faith, or unconscionable and which causes damage to any of the parties or to the public."