c. Failing to individually notify Class members of the Worn Accelerator recall and underlying dangerous condition; and

d. Violating other laws alleged herein.

83. Plaintiff and Class members suffered and will continue to suffer damages including but not limited to those set forth in paragraph 8.

84. Defendants' conduct has impaired competition in the motor vehicle industry. It provided Defendants with an unfair advantage compared to its competitors when manufacturing and selling vehicles and earning profits thereon.

85. Plaintiff seeks the injunctive relief set forth in paragraph 9 pursuant to Cal. Bus. & Prof. §§ 17070 and 17203.

86. As stated in Cal Bus. & Prof. § 17082, "[i]n any action under this chapter, it is not necessary to allege or prove actual damages or the threat thereof." To the extent actual damages are proven, Plaintiff may be entitled to "three times the amount of the actual damages." Plaintiff hereby seeks an award of actual and treble damages.

87. Plaintiff also seeks an award of attorneys' fees and costs of the suit under Cal. Bus. & Prof. § 17082.

FOURTH CLAIM FOR RELIEF
FALSE ADVERTISING

88. Plaintiff re-alleges all preceding allegations as if fully set forth herein.

89. California Business and Professions Code § 17500 states:

> It is unlawful for any . . . corporation . . . with intent directly or indirectly to dispose of real or personal property . . . to induce the public to enter into any obligation relating thereto, to make or disseminate or cause to be made or disseminated . . . from this state before the public in any state, in any newspaper or other publication,

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