Plaintiff Roz Schwartz makes the following allegations based on an investigation by Plaintiff's counsel that included, *inter alia*, review and analysis of Defendants' websites, various other websites, various news articles, and filings in other litigation against Defendants. In support of Plaintiff's Class Action Complaint ("Complaint"), Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction under the Class Action Fairness Act of 2005, 28 U.S.C. § 1332(d), because at least one class member is of diverse citizenship from at least one defendant; there are more than 100 class members nationwide; and the aggregate amount in controversy exceeds $5 million. This Court has personal jurisdiction over Defendants because Defendant Toyota Motor Sales, U.S.A., Inc. is headquartered in California, and both Defendants conduct business in this state.

2. Pursuant to 28 U.S.C. § 1391(a)(2), venue is proper in this District because a substantial part of the acts giving rise to Plaintiff's claims occurred in this District.

NATURE OF ACTION

3. This is a class action lawsuit against Defendants for an admittedly dangerous defect in millions of its vehicles that can cause accelerator pedal mechanisms to get stuck in an open position, which would cause the vehicle to accelerate unintentionally ("unintended acceleration").

4. Defendants issued two separate recalls to address problems with unintended acceleration in its vehicles. One involved accelerator pedals interfering with floor mats (the "Floor Mat Interference" recall). The other involved worn accelerator mechanisms getting stuck in an open position, independent of any floor mat interference (the "Worn Accelerator" recall). In total, Defendants recalled 5.9 million cars due to these defects.