C. Plaintiff's Experiences

47. Plaintiff Roz Schwartz owns a 2007 Toyota Camry, a model affected by both the Floor Mat Interference recall and Worn Accelerator recall.

48. In late 2009, she experienced unintended acceleration in her Camry. She was able to stop the car without incident. She experienced unintended acceleration on other occasions since then.

49. In late 2009, she received a letter from Toyota announcing the Floor Mat Interference recall. In response, she removed her floor mat.

50. Schwartz has not received a letter from Toyota announcing the Worn Accelerator recall.

51. Plaintiff has driven her Camry less often since learning of the recalls. She is concerned about putting herself or others at risk. Also, she generally has not allowed passengers to drive with her, for fear that they might get hurt. This has been an inconvenience to Plaintiff.

52. She sometimes uses her husband's car in lieu of her Camry. This is an inconvenience to both her and her husband.

53. Plaintiff has lost trust in Toyota and her Camry. She is skeptical that her Camry will not be safe even if Toyota fixes it. She is also skeptical that, because Toyota's Floor Mat Interference recall did not completely resolve the acceleration problem (i.e., another recall was necessary), the Worn Accelerator recall might be equally incomplete and inadequate.

54. She also believes that the resale value of her Camry will decrease due to general consumer skepticism about Toyota and the Camry model.

CLASS ACTION ALLEGATIONS

55. Pursuant to Rule 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, Plaintiff brings this action individually and on behalf of all other persons similarly situated (the "Class"), defined as follows:

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