Perhaps more important is the uncontested fact that the Toyota Defendants are refusing to provide an inexpensive "fix" that they are providing on new cars. The evidence establishes that the lack of a brake override system is inherently dangerous.

The denial of the injunction will cause Plaintiffs and proposed class members who own or lease Toyota vehicles to suffer irreparable harm during severe economic times. Plaintiffs and proposed class members are forced to either drive an unsafe car or find alternative means of transportation at costs they cannot afford. Plaintiffs require immediate assistance, in the form of safe and dependable alternative transportation. The presence of Toyota vehicles subject to SUA on Ohio's highways and streets not only is endangering Ohio drivers and their passengers but also is endangering other motorists and pedestrians.

Finally, due to fear and several occurrences of SUA, Mr. and Mrs. Kamphaus were recently convinced by Toyota to trade their 2009 Toyota Camry for a new vehicle. Before Toyota takes actions that might alter or modify this vehicle, erase information stored in its computer memory, and thus cause irreparable injury by limiting Plaintiffs' ability to pursue litigation, a court order is necessary to prevent its modification or alteration.

Injunctive relief will not injure any third parties. To the contrary, it will prevent injury to third parties and will promote the public interest in highway safety by keeping dangerous cars and trucks off of Ohio's roads.

B. The Requested Relief Is Reasonable

Under the circumstances of this case, the requested injunctive relief is reasonable. Defendants should perform the brake override modification immediately on all cars with electronic throttle control to avoid the obvious danger. Until this is done, Defendants should be made to take immediate steps to provide safe alternative transportation. This is both logical and