reimbursement of out of pocket costs for, among other things, alternative transportation, prior repairs to address accelerator problems, floor mats that had to be discarded, etc.; (iii) diminution in resale value of the vehicles; and (iv) an increased risk of physical harm.

6. Plaintiffs also seek injunctive relief including: (i) repairs to remove the dangerous condition; (ii) an extension of warranty coverage covering components of the acceleration system; and (iii) individual notice to each owner effected by the worn accelerator recall disclosing the dangerous condition.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1332(d)(2) because the matter in controversy, upon information and belief, exceeds $5,000,000, exclusive of interests and costs, and this matter is a class action in which Class members are citizens of a different state than that of Defendants.

8. Venue is proper in this Court pursuant to 28 U.S.C. §1391 because the acts of the Defendants occurred in this County.

9. 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.

PARTIES

10. Plaintiff Matthew Marr is a resident of Los Angeles, California. He owns a 2007 Toyota Camry, a model affected by both the floor mat interference recall and worn accelerator recall.

11. Plaintiffs Luis and Sylvia Fernandez are residents of Los Angeles, California. They own a 2010 Toyota Camry, a model affected by both the floor mat interference recall and worn accelerator recall.

12. Defendant Toyota Motor Sales, U.S.A., Inc. ("Toyota-USA") is headquartered in Los Angeles, California. Toyota-USA is a wholly owned subsidiary

TOY-TQ002-06-3D-00003071