31. On January 26, 2010, Toyota issued a press release announcing that it would suspend sales of vehicles effected by the worn accelerator recall until a remedy was available.

32. Given the fact that Toyota had received approximately 2,000 complaints of unintended acceleration during that time period, it is clear that Toyota failed to properly and appropriately investigate these incidents and to issue appropriate remedies while being on notice of the defects in its vehicles.

33. Toyota has also failed to include in its recall, Toyota hybrid vehicles such as the Camry hybrid which Plaintiffs allege upon information and belief suffers from the same dangerous unintended acceleration defect.

34. Toyota has not taken effective steps to remedy this dangerous condition. Although Toyota has announced that it will begin installing accelerator-override systems in new vehicles which will reduce engine power to idle at any time the brake pedal is depressed, it has not agreed to recall and retrofit its prior vehicles with such a safety feature.

A. Plaintiffs' Experiences

35. Plaintiff Matthew Marr owns a 2007 Toyota Camry hybrid, a model allegedly affected by both the floor mat interference recall and worn accelerator recall.

36. In late 2009, he received a letter from Toyota announcing the floor mat interference recall.

37. Plaintiff has not received a letter from Toyota announcing the worn accelerator recall.

38. In January 2010, on two different occasions, Mr. Marr experienced unintended acceleration in his Camry. He was able to stop the car without incident.

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