d. Despite the relatively small size of individual class members' claims, their aggregate volume, coupled with the economies of scale inherent in litigating similar claims on a common basis, will enable this case to be litigated as a class action on a cost-effective basis, especially when compared with repetitive individual litigation; and

e. No unusual difficulties are likely to be encountered in the management of this class action in that all questions of law or fact to be litigated at the liability stage are common to the class.

46. Class certification is fair and efficient as well because prosecution of separate actions would create a risk of adjudications with respect to individual members of the class, which as a practical matter may be dispositive of the interests of other members not parties to the adjudication or substantially impair or impede their ability to protect their interest. To Plaintiff's knowledge, no similar litigation is currently pending although Plaintiff is informed that an action was filed in the United States District Court for the Eastern District of Louisiana on or about January 29, 2010 entitled *Weimer v. Toyota* which purports to seek a nationwide class arising out of some of the same underlying factual allegations contained herein but assert predominately different causes of action.

VI. CAUSES OF ACTION

AS AND FOR A FIRST, SEPARATE AND DISTINCT CAUSE OF ACTION

(Breach of Contract)

47. Plaintiff repeats and realleges all of the preceding paragraphs of this Complaint with the same force and effect as if here set forth at length.

48. Plaintiff's first cause of action is for breach of contract on behalf of herself and the class members as described above.

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