for expected users of the Subject Vehicles even though Subject Vehicles were operated by expected users in a reasonable manner.

76. Toyota should have reasonably foreseen that the dangerous conditions of the Subject Vehicles suddenly and unexpectedly accelerating would subject Plaintiffs and the Class Members to harm.

77. Because of this defective design, the Subject Vehicles are unreasonably dangerous.

78. Plaintiffs and the Class Members have used the Subject Vehicles reasonably and as intended, to the fullest degree possible given the defective nature of the accelerator pedals, and, nevertheless, have suffered damages through no fault of their own.

79. A safer alternative design existed for the Subject Vehicles.

80. As a direct and proximate result of Toyota's design, manufacture, assembly, marketing, and sales of the Subject Vehicles, Plaintiffs and the Class Members have sustained and will continue to sustain the loss of use of their vehicles and economic losses, and are, therefore, entitled to compensatory relief according to proof, and entitled to a declaratory judgment that Toyota is liable to Plaintiffs and the Class Members for breach of its duty to design, manufacture, assemble market, and sell a safe product, fit for its reasonably intended use. Plaintiffs and the Class Members are therefore entitled to equitable relief as described below.

WHEREFORE, Plaintiffs demand judgment against Toyota for design defects as prayed for below.

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