ANSWER:

Plaintiffs are informed and believe that the claims should be tried non-jury because they will involve multiple complex legal issues related to the existence of a common defect or common defects in Defendants' vehicles that are the subject of this action.

INTERROGATORY C:

State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER:

Plaintiffs are not publicly owned companies.

INTERROGATORY D:

State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER:

Plaintiff's claims are properly asserted in this division because Plaintiff Roberts purchased a Toyota Camry in Spartanburg, South Carolina and resides in Spartanburg, South Carolina; more than one member of the proposed class lives in this division; and Defendant resides in this division given that it is subject to personal jurisdiction in this division; and a substantial part of the events or omissions giving rise to the claims occurred in this division.