explained below, the *Roberts* Action and the Related Actions meet these criteria.

1. These Actions Involve Common Questions of Fact.

The *Roberts* Action and the Related Actions satisfy the first criterion of § 1407(a) because they involve many common questions of fact. Each action arises from the diminished value of Toyota vehicles as a result of product defects related to unintended acceleration, and also relates to Defendants' conduct regarding those defects, as can be seen from a comparison of the Complaints filed in those actions. *See In re Air West, Inc. Sec. Litig.*, 384 F. Supp. 609, 611 (J.P.M.L. 1974) ("Indeed, when two or more complaints assert comparable allegations against identical defendants based on similar transactions or events, common factual questions are presumed.").[1] The common questions derive from, but are not limited to, the unknown cause of uncontrolled, unintended, and/or sudden acceleration in the subject vehicles, Defendants' knowledge about the acceleration defect, and when Defendants' acquired or should have acquired that knowledge, and Defendants' conduct after learning of the unintended acceleration defects.

2. Coordination or Consolidation of These Actions Will Be for the Convenience of the Parties and Witnesses.

Coordination or consolidation of these actions will satisfy the second criterion under § 1407(a) by eliminating party and witness inconvenience and unnecessary expenses that would result from the production of the same documents and evidence and the depositions of the same

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[1] Although the defendants in the *Roberts* Action and the Related Actions are not identical, transfer and consolidation is appropriate because all of the named defendants are Toyota entities that participated in the design, manufacture, marketing, distribution, or sale of vehicles with the acceleration defect. *See In re Phenylpropanolamine (PPA) Prods. Liab. Litig.*, 173 F. Sup. 2d 1377, 379 (J.P.M.L. 2001) ("Notwithstanding differences among the actions in terms of named defendants, specific products involved, legal theories of recovery, status as class actions, and/or types of injury alleged, all actions remain rooted in complex core questions concerning the safety of [the defective product].'); *see also In re Silicone Breast Implant Litig.*, 793 F. Supp. 1098, 1100 (J.P.M.L. 1992) (finding that common questions of fact existed where different manufacturers designed similar defective products).