wake them up about the seriousness of its obligations to the American purchasers. Federal officials in the press described Defendants as maybe "a little safety dead." Meanwhile, despite knowledge of this information and taking preventative steps in Europe, Defendants continued to manufacture, market and/or sell automotive vehicles affected with said defect until directly requested by Federal Department of Transportation officials.

18. In September 2007, Toyota recalled an accessory all-weather floor mat sold for use in some 2007 and 2008 model year Lexus ES 350 and Toyota Camry vehicles because of similar problems, thereby proving that Defendants had knowledge since at least 2007 of this safety problem affecting the previously listed automotive vehicles.

CLASS REPRESENTATION ALLEGATIONS

19. Plaintiff re-alleges paragraphs 1 through 18 and further states:

20. Plaintiff brings this action pursuant to Rule 23, Fed.R.Civ.P., on behalf of the Proposed Class, which is defined herein.

21. Membership in the Proposed Class is so numerous as to make it impractical to bring all of the Proposed Class members before the Court. The exact number and identity of the Proposed Class is unknown; however, Plaintiff knows that there are millions of persons in the Proposed Class. Plaintiff is a member of the Proposed Class.

22. There are numerous and substantial questions of law and fact common to the Proposed Class which control this litigation, and which predominate over any individual issues. Included within the common questions are:

22.1 whether Defendants had knowledge of the design defect prior to its issuance of the current safety recall affecting millions of vehicles;

22.2 whether Defendants concealed the design defect affecting the following models of automotive vehicles: 2007-2010 Camry; 2009-2010 Corolla; 2005-2010 Avalon; 2004-2009 Prius; 2005-2010 Tacoma; 2007-2010 Tundra; 209-2010 RAV4; 2009-2010 Matrix; 2008-2010 Highlander; 2008-2010 Sequoia; 2009-2010 Venza; 2007-2010 Lexus ES350; 2006-2101 Lexus IS250 and IS350; and 2009-2010 Pontiac Vibe;

22.3 whether Defendants misrepresented the safety of the automotive vehicles at issue;

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