rankings. Toyota admits that its perceived quality created a "sacred bond" between the Toyota Defendants and United States consumers.

46. Defendants, without warning its United States consumers, consciously permitted its quality to diminish when its focus on growth and profit overwhelmed its focus on quality. Paul Ingrassia, an author and former Wall Street Journal Reporter who focuses on the auto industry, identified the problem when he wrote on January 28, 2010:

> Some 4.8 million Toyota cars and trucks might suffer from sticking accelerator pedals or faulty floor mats that seem to grab the accelerator (some have been recalled for both reasons) and can cause the car to accelerate out of control. Several deaths have been attributed to the problem.
>
> How could this possibly happen to the car company that was the undisputed leader in quality, the company that all the others from Germany and America and even Japan wanted to emulate? The answer is almost too simple.
>
> Toyota is suffering from trying to get too big, too fast. In the early years of this century the company sensed weakness among its Detroit rivals in the American market, and also opportunity in China and other emerging markets outside the U.S. So it began a headlong expansion spree around the world.
>
> In doing this Toyota abandoned one of the shibboleths of its conservative culture: never building a new product in a new factory with a new workforce. Any new Toyota factory, anywhere in the world, would first build a vehicle that Toyota was making at one of its existing plants. That approach minimized quality-control variables.

47. Upon information and belief, TMMK began replacing experience factory workers with temporary workers who did not possess the same skills to build quality vehicles. Defendants' deception concerning quality began by at least 2002. In 2002, at least ten Toyota owners alerted Toyota that the engine in the 2002 Model Year Camry surged when the car was stopped or when the

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