driver had his foot on the brake. Plaintiff Shonfield from Cincinnati, Ohio, who owned a 2002 Toyota Camry, suffered a SUA incident in 2006.

48. Since 2002, Defendants received numerous incident reports involving Toyota and Lexus owners. The owners and drivers reported that their Toyota-manufactured vehicles suddenly and unexpectedly accelerated, resulting in accidents, including fatalities.

49. In total, from 1999 to January 19, 2010, Defendants had knowledge of more than 2,000 reports of SUA. The reports included 2,262 total incidents, 819 crashes, 341 injuries and 26 deaths.

50. Defendants' response to these incidents primarily was to blame the drivers and attempt to avoid costly recalls. When federal officials began to doubt Toyota's explanation, Toyota blamed the incidents on floor mats that interfered with the acceleration pedal or the vehicles' "sticking" accelerator pedals. To deflect federal inquiry, Defendants posed these "answers" to SUA and sought to stifle governmental investigations. Despite substantial evidence to the contrary, Defendants never publicly acknowledged that Toyota-manufactured vehicles suffered from serious design and engineering defects.

51. In 2002, Toyota began using a "drive-by-wire" system in its Toyota and Lexus models in the United States, starting with the Lexus ES 300. Thereafter, reports of unintended acceleration related to Toyota and Lexus vehicles increased substantially. Reports of SUA linked to the Lexus ES 300 model increased from 26 per year on average in 2001 to 132 per year in 2002.

52. The drive-by-wire system uses sensors, microprocessors and electric motors rather than a mechanical link such as a steel cable to connect the accelerator pedal to the throttle plate in the engine. The acceleration pedal has no direct connection to the engine through a cable or

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