A. Whether Defendants should be declared financially responsible for notifying all class members of the defective nature of the cars and for the costs and expenses of inspecting, repairing, and replacing of all such vehicles;

B. Whether the Toyota vehicles suffer from a SUA defect and/or a braking defect;

C. Whether design defects cause the vehicles to suffer from SUA and/or inability to brake properly;

D. Whether Defendants knew or became aware that the vehicles were not properly designed, yet continued to manufacture, distribute, advertise, and market the cars without correcting the problems and while concealing the defective design from the public and the class;

E. Whether Defendants engaged in a pattern and practice of deceiving and defrauding the class and suppressing the defective nature of the cars;

F. Whether Defendants engaged in two or more acts of mail or wire fraud during the previous six years;

G. Whether Defendants failed to give adequate warnings regarding the cars;

H. Whether Defendants, through written advertising and other representations, created express or implied warranties that were breached;

I. Whether Defendants are strictly liable for damages to the plaintiffs and the members of the Plaintiffs' Class;

J. Whether Defendants acted negligently;

K. Whether Plaintiffs and the members of the proposed class are entitled to compensatory damages;

L. Whether plaintiffs and the members of the proposed class are entitled to punitive or exemplary damages and, if so, the nature of such damages;

M. Whether Plaintiffs and members of the proposed class are entitled to an award of reasonable attorneys' fees, prejudgment interest, post-judgment interest and costs of suit; and

N. Whether Defendants violated 18 U.S.C. Section 1962 (c), Racketeer Influenced and Corrupt Organization Act.

TOY-TQ002-06-3D-00005476