comprised of all other consumers within the state who purchased the Recalled Vehicles during the relevant time period.

25. Questions of law and fact are common to all members of the Class as they relate to Toyota's practices and omissions which were applied uniformly to all members of the Class. Putative class members were and are similarly affected by having purchased the defective autos. Plaintiff seeks relief for her own benefit and for the benefit of the members of the putative Class.

26. Based on the annual sales of the defective autos in Tennessee, it is apparent that the number of affected consumers would be in the thousands, thereby making joinder unfeasible.

27. Questions of law and fact common to the Class exist and predominate over questions affecting only individual members, including, *inter alia*:

(a) Whether Toyota was unfair or deceptive in its design, testing, manufacture, assembly, development and sale of the Recalled Vehicles, thus fraudulently inducing the Class members to purchase the vehicles.

(b) Whether Toyota breached express warranties in its sale of the Recalled Vehicles, thereby causing harm to plaintiff and other Class members;

(c) Whether Toyota breached implied warranties in its sale of the Recalled Vehicles, thereby causing harm to plaintiff and other Class members;

(d) Whether Toyota fraudulently concealed the risks associated with its design, testing, manufacture, assembly, development and sale of the Recalled Vehicles; and

(e) Whether Toyota's practices in connection with the promotion, marketing, advertising, packaging, labeling and sale of the Recalled Vehicles unjustly enriched Toyota at the expense of, and to the detriment of, plaintiff and other Class members.

28. Plaintiff's claims in this action are typical of the claims that would be sought by other