provided the driver with an important fail-safe in the event that there was an unintended acceleration, which is an acceleration not caused by the driver applying pressure to the gas pedal. Thus, if an unintended acceleration occurred, ETCS could be deactivated and throttle control would be returned to the driver by way of the mechanical connection.

24. In or around 2002, Defendants stopped including the mechanical connection between the gas pedal and the throttle in their vehicles.

25. Complaints of unintended acceleration in Toyota-produced vehicles rose sharply after 2001, when Defendants began implementing ETCS.

26. Complaints of unintended acceleration in Toyota-produced vehicles also increased after 2002, when Toyota removed all mechanical fail-safe measures and only installed ETCS.

27. Defendants failed to implement ETCS technology in conjunction with other important fail-safe measures that would maintain driver control in the event of unintended acceleration.

28. An example of such a fail-safe is a computer algorithm that was available in non-Toyota-produced vehicles designed with ETCS and that would have required ETCS to reduce the engine to idle if the brakes were applied while the throttle was in an open position (hereinafter "the Brake to Idle feature").

29. The Toyota-produced vehicles equipped with ETCS are unreasonably dangerous and defective because these vehicles are susceptible to sudden, unintended acceleration.

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