single forum simultaneously, efficiently, and without the unnecessary hardship that would result from the prosecution of numerous individual actions and the duplication of discovery, effort, expense and burden on the courts that such individual actions would engender. The benefits of proceeding as a class action, including providing a method for obtaining redress for claims that would not be practical to pursue individually, outweigh any difficulties that might be argued with regard to the management of this class action.

V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

(Unlawful Business Acts and Practices; Business and Professions Code §17200, *et seq.*)

29. Plaintiffs repeat and reallege all preceding paragraphs as if fully set forth herein.

30. This cause of action is brought on behalf of Plaintiffs and members of the Class pursuant to Cal. Business and Professions Code §17200, *et seq.* as a result of Toyota's violation of the Consumers Legal Remedies Act, Cal. Civ. Code §1750, *et seq.* (the "CLRA"). Plaintiffs reserve the right to identify additional violations of laws as circumstances and further investigation warrant.

31. Toyota's business acts and practices were unlawful under the CLRA, which forbids deceptive advertising as detailed herein. As a result of the unlawful business acts practices described above, including, but not limited to, Toyota promises that its vehicles are safe to operate, Plaintiffs and other members of the Class, pursuant to Cal. Business and Professions Code §17203, are entitled to an order enjoining such future conduct on the part of Toyota and such other orders and judgments as may be necessary to disgorge Toyota's ill-gotten gains and to restore to any person in interest any money paid for the Recalled Vehicles as a result of the wrongful conduct of Toyota.

///