the Class are geographically dispersed throughout the United States, and that joinder of all Class members would be impracticable. While the exact number of Class members is unknown to Plaintiff at this time, Plaintiff believes that there are, at least, many thousands of members of the Class.

50. Plaintiff's claims are typical of the claims of the other members of the Class. Plaintiff and the members of the Class purchased Toyotas at artificially high prices established by the actions of Defendant. Plaintiff and the members of the Class have all sustained damage in that they paid inflated prices for Toyotas due to Defendant's wrongful conduct.

51. Plaintiff will fairly and adequately protect the interests of the members of the Class and has retained counsel competent and experienced in class action and consumer fraud litigation.

52. Defendant has acted or refused to act on grounds generally applicable to the class, thereby making appropriate final injunctive relief or corresponding declaratory relief with respect to the Class as a whole.

53. Common questions of law and fact exist as to all members of the Class and predominate over any questions solely affecting individual members of the Class. Among the questions of law and fact common to the Class are:

a. whether Defendant had knowledge of the design defect prior to its issuance of the current safety recall affecting millions of vehicles;
b. whether Defendant concealed the design defect affecting Toyota vehicles;
c. whether Defendant misrepresented the safety of the automotive vehicles at issue;
d. whether Defendant's actions or omissions with regard to the select models of vehicles violate California Business & Professions Code §§ 17200, *et seq.* and the Consumers Legal Remedies Act, Civ. Code §§ 1750, *et seq.*;

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