Toyota purchasers have been paying more for the cars than they would have had they known about the heightened risk of sudden acceleration in the vehicles.

37. Had Toyota timely and adequately disclosed to consumers their vehicles' propensity to unexpectedly and uncontrollably accelerate, neither Plaintiffs nor members of the Class would have purchased these vehicles and taken that heightened risk each time they drove. Now that they own the cars, the value of their vehicles is diminished as a result of the true dangers and defects being disclosed.

CLASS ACTION ALLEGATIONS

38. Plaintiffs bring this class action on behalf of all similarly situated persons, pursuant to Fed. R. Civ. P. 23(b)(3).

39. **Numerosity**: Members of the Class are so numerous and geographically disbursed that their joinder would be impracticable. The Class includes thousands of owners of Toyota vehicles. Judicial economy favors a class action mechanism instead of forcing each class member to bring a separate action individually.

40. **Commonality**: Common questions of law and fact predominate over any individual questions of separate Class members. The common questions of law and fact include, but are not limited to, the following:

a. Whether Toyota violated Wyoming's product liability law;

b. Whether the defects in the vehicles recalled by Toyota render them unfit for their intended use;

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