

**PE09-019
TOYOTA
RESPONSE 4
FIELD REPORT**

TQCN DOC# FTR-70W110361		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 32705-1	Date 4/18/2006
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 31-Jan-2006	Odometer 1036 mi	VIN (confirm 17 characters): JTDKKB20U267 [REDACTED]	
Condition Title Headlights Inop							

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 03-APR-2006	Optional Ref.	Optional Approval
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Condition Description

- Customer states headlights and taillights do not operate.

Diagnostic Steps:

- Technician inspected and confirmed the customer's concern.
- Technician performed diagnosis as per repair manual.

Probable Cause

- Headlight switch assembly.

Part # 1: 8414047061	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

- Technician replaced headlight switch and condition is corrected.



Headlight Switch.



17F100
PP - GF20

FIELD TECHNICAL REPORT



TQCN DOC# FTR-70W110361	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 32705-1	Date 4/18/2006
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 31-Jan-2006	Odometer 1036 mi	VIN (confirm 17 characters): JTDKKB20U267 [REDACTED]	
Condition Title Headlights Inop						

	47061 E11 17F179

Attachment 1: PRCS

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN



Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先:	
		Tel:			Tel:	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 8414047061	Part Description SWITCH ASSY, HEADLAMP DIMMER			Qty. 1	Used Part Value \$ 13 .00
	Comments:					
2	Part # 2:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
3	Part # 3:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					

TQCN DOC# FTR-70W118461	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 32705-1	Date 7/5/2006
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 14-Feb-2006	Odometer 427 mi	VIN (confirm 17 characters): JTDKDB20U167 [REDACTED]	
Condition Title Headlights Inop.						

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 30-JUN-2006	Optional Ref.	Optional Approval
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Condition Description

- Customer states the headlights do not operate.

Diagnostic Steps:

1. Technician inspected and confirmed the customer's concern.
2. Technician ohm tested headlight switch terminals 20 Red Wire & 12 Green Wire at connector C11 with headlight switch on. (**Open Circuit**)
3. Technician jumped headlight switch terminals 20 Red Wire & 12 Green Wire together at connector C11. (**Headlights Operated**)

Probable Cause

- Headlight Switch.

Part # 1: N/A	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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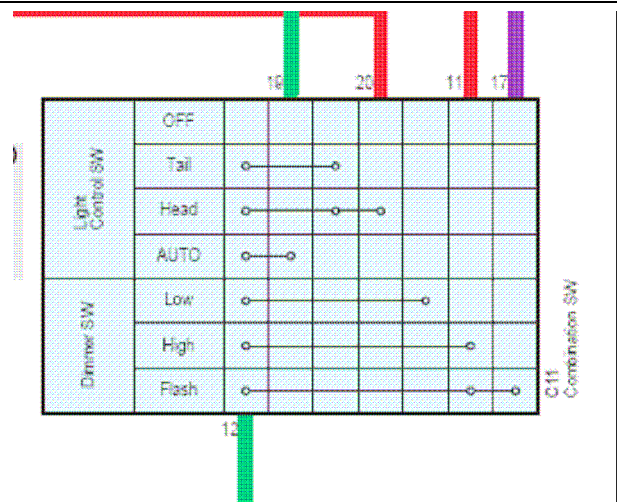
Repair Process

1. Technician replaced headlight switch.



Ohm test of headlight switch connector C11.
Terminals 20 & 12 with Headlight switch on.

Open Circuit.



Headlights operate when terminals 20 & 12 are jumped together at Headlight switch connector C11.

FIELD TECHNICAL REPORT



TQCN DOC# FTR-70W118461		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 32705-1	Date 7/5/2006
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 14-Feb-2006	Odometer 427 mi	VIN (confirm 17 characters): JTDKKB20U167 [REDACTED]	
Condition Title Headlights Inop.							

Attachment 1: PRCS

Attachment 1: Parts Recovery Control Sheet

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Orig
Tracking

VIN



Doc No.



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Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: N/A	Part Description			Qty. 1	Used Part Value \$ 0 .00
	Comments:					
2	Part # 2:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
3	Part # 3:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

TQCN DOC# FTR-5WW115671		Affiliate TMS	Dept. QA-Electrical	Source TMS SrvCtr	Location TMS	Ref 40227-1	Date 6/6/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 30-Nov-2005	Odometer 40207 mi	VIN (confirm 17 characters): JTDKKB20U467 [REDACTED]	
Condition Title HID Headlight Inoperative							

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 04-JUN-2007	Optional Ref.	Optional Approval
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Condition Description

Customer reported left headlight goes out while driving

Diagnostic Steps:

- Inspected vehicle
- Found left HID headlight turns off after about thirty minutes
- Checked headlight circuit for power – ok

Probable Cause

Unknown

Part # 1: 8110747150	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

- Replaced left headlight control computer
- Problem eliminated
- Tagged and recovered original parts



Headlight Control Computer

Attachment 1: PRCS

TQCN DOC# FTR-5WW115671		Affiliate TMS	Dept. QA-Electrical	Source TMS SrvCtr	Location TMS	Ref 40227-1	Date 6/6/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 30-Nov-2005	Odometer 40207 mi	VIN (confirm 17 characters): JTDKKB20U467 [REDACTED]	
Condition Title HID Headlight Inoperative							

Attachment 1: Parts Recovery Control Sheet



Orig
Tracking

VIN

Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先:	
		Tel:			Tel:	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 8110747150	Part Description COMPUTER SUB-ASSY, HDLP LIGHT CONT, RH			Qty. 1	Used Part Value \$ 39 .00
	Comments:					
2	Part # 2:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
3	Part # 3:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
4	Part # 4:	Part Description			Qty. \$	Used Part Value .00
	Comments:					
5	Part # 5:	Part Description			Qty. \$	Used Part Value .00
	Comments:					
6	Part # 6:	Part Description			Qty. \$	Used Part Value .00
	Comments:					
7	Part # 7:	Part Description			Qty. \$	Used Part Value .00
	Comments:					
8	Part # 8:	Part Description			Qty. \$	Used Part Value .00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-JZW128971A		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/18/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 09-Dec-2005	Odometer 35875 mi	VIN (confirm 17 characters): JTDKB20U467 [REDACTED]		
Condition Title Exterior Lighting Head Light Open Circuit							

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 11-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

- Left side HID headlight goes out while driving
- Customer states condition occurs intermittently after 30 minutes of driving
- Vehicle had same condition with right side headlight previously-repaired by replacing HID ECU and bulb

Diagnostic Steps:

- Operate headlights-could not duplicate condition over 60 minutes of operation in shop
- Inspect pin fit-OK
- Inspect for corrosion on connectors-none found

Probable Cause

- Unknown

Part # 1: 9098120015	Part # 2: 8110747150	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

- Replaced Left side Headlight ECU P/N 81107-47150 and HID Bulb P/N 90981-20015
- Customer states condition has not returned since repair (six days)



HID Bulb



Headlight ECU

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JZW128971A	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/18/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 09-Dec-2005	Odometer 35875 mi	VIN (confirm 17 characters): JTDKB20U467 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value \$ 46 .00
	Comments:					
2	Part # 2: 8110747150	Part Description COMPUTER SUB-ASSY, HDLP LIGHT CONT, RH			Qty. 1	Used Part Value \$ 39 .00
	Comments:					
3	Part # 3:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
8	Part # 8:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-JZW128971A	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/18/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 09-Dec-2005	Odometer 35875 mi	VIN (confirm 17 characters): JTDKCB20U467 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

TQCN DOC# FTR-JZW128971B	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/18/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 10-Aug-2006	Odometer 26759 mi	VIN (confirm 17 characters): JTDKB20U6632	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 07-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

- Headlights go out while driving intermittently
- Usually within 5-10 minutes of driving

Diagnostic Steps:

- Road tested vehicle to confirm condition
- Could not duplicate condition

Probable Cause

- Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: No part available	Parts Shipping Destination: N/A
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Repair Process

- Replaced HID headlight bulbs P/N 90981-20015
- Cleaned corrosion on connectors H3 and H5
- Condition has not returned in 10 days

<p>2006 Prius EWD Headlight Connector H5 Corrosion present</p>	<p>2006 Prius EWD Headlight Connector H3 Corrosion present</p>

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JZW128971B	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/18/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 10-Aug-2006	Odometer 26759 mi	VIN (confirm 17 characters): JTDKKB20U6632	
Condition Title Exterior Lighting Head Light Open Circuit						

Attachment 1: PRCS

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

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VIN

Doc No.



Final Destination: N/A		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID	Qty. 2	Used Part Value \$ 46 .00		
	Comments:					
2	Part # 2:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
3	Part # 3:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
7	Part # 7:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
8	Part # 8:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					

TQCN DOC# FTR-7ZW129771		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 31864-1	Date 10/24/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 08-Jun-2006	Odometer 32188 mi	VIN (confirm 17 characters): JTDKKB20U667 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 18-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

Customer states when headlights are turned "ON" 2-3 minutes later one headlight will turn "OFF" then the other headlight will turn "OFF".

Diagnostic Steps:

- Technician duplicated the customer's concern, when headlights are turned "ON" after a short time they both turned "OFF".
- If the headlight switch is cycled to "OFF" and back "ON" the headlights turn "ON" again.
- Technician checked voltage at both HID headlamp assemblies with the Headlights "ON", both were receiving battery voltage.
- While checking voltage at both HID headlamp assemblies the headlamps turned "OFF", but the voltage to the headlights remained constant.
- Headlight bulbs were swapped from problem vehicle into a like vehicle.
- Headlights were turned "ON" on the like vehicle and after a short time they both headlights turned "OFF"



Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

Technician replaced Left and Right HID bulb assemblies (P/N 90981-20015) to repair vehicle.

			
Bulbs That Were Replaced		HID Bulb Markings	
		42406 2C628	42406 2D604

FIELD TECHNICAL REPORT



TQCN DOC# FTR-7ZW129771		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 31864-1	Date 10/24/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 08-Jun-2006	Odometer 32188 mi	VIN (confirm 17 characters): JTDKKB20U667 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							

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VIN

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Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先:	
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T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value \$ 46 .00
	Comments:					
2	Part # 2:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
3	Part # 3:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
8	Part # 8:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-JZW116971A	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/29/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 09-Dec-2005	Odometer 30227 mi	VIN (confirm 17 characters): JTDKKB20U467 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 06-JUN-2007	Optional Ref.	Optional Approval
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Condition Description

- Right Front Headlamp Inoperative (HID)

Diagnostic Steps:

- Confirm condition
- Replace bulb-condition returned
- Checked/tightened pin fit-condition returned
- Performed wiggle test on wire harness and connectors-could not duplicate condition

Probable Cause

- Undetermined

Part # 1: 8110747150	Part # 2: 9098120015	Part # 3: 8114547170	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

- Replaced complete headlamp assembly, with bulb and HID ECU



Right Front Headlamp Assembly
Part Number 81145-47170



Computer, Light Control
Part Number 85967-51040

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JZW116971A	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 10/29/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 09-Dec-2005	Odometer 30227 mi	VIN (confirm 17 characters): JTDKKB20U467 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Attachment 1: Parts Recovery Control Sheet

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Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先:	
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	Comments:					
2	Part # 2: 9098120015	Part Description BULB, HID	Qty. 1	Used Part Value \$ 46 .00		
	Comments:					
3	Part # 3: 8114547170	Part Description UNIT,	Qty. 1	Used Part Value \$ 47 .00		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
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	Comments:					
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	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-5LW129771A		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 10/29/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 19-Jan-2006	Odometer 35549 mi	VIN (confirm 17 characters): JTDEKB20U267 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 19-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

Customer states that the left headlight works intermittently.

Diagnostic Steps:

- Technician could not duplicate the condition as described by the customer.
- FTS advised technician to swap bulbs from left to right, release to the customer to drive vehicle until issue is present again.
- Customer returned to the dealer and indicated that the right bulb was now out.
- Found that the condition followed the bulb

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

Replacement of the bulb has repaired the vehicle to date.



Philips Germany
DR4 XenEco 42406
0A6 DOT 35W 2L524

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-5LW129771A		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 10/29/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 19-Jan-2006	Odometer 35549 mi	VIN (confirm 17 characters): JTDKKB20U267 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							

Attachment 1: Parts Recovery Control Sheet

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Orig
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VIN

Doc No.



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Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:	
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	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
8	Part # 8:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-5LW129771	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 10/29/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 05-May-2006	Odometer 33318 mi	VIN (confirm 17 characters): JTDKKB20U7631	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 23-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

Customer states that the left headlight is out.

Diagnostic Steps:

- Technician verified that the left headlight was out
 - As per the repair manual the tech replaced the bulb

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

Replacement of the bulb repaired the vehicle.



Philips Germany
DR4 XenEco 42406
0A6 DOT 35W 2C602

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-5LW129771		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 10/29/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 05-May-2006	Odometer 33318 mi	VIN (confirm 17 characters): JTDKKB20U763 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value \$ 46 .00
	Comments:					
2	Part # 2:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
3	Part # 3:	Part Description			Qty. 0	Used Part Value \$ 0 .00
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
8	Part # 8:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-5ZW130471	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-SET	Ref 31864-1	Date 11/2/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 19-Jul-2006	Odometer 20910 mi	VIN (confirm 17 characters): JTDKB20U667 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 08-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

Driver's side headlight turns off at times. It will not reactivate until the ignition key is cycled from ON to OFF.

Diagnostic Steps:

Technician replaced the headlight, condition continued.
Technician replaced the headlight ECU, condition continued.
Technician swapped the headlight from driver's side to passenger's side, condition continued.
Technician replaced the Driver's side headlight assembly and this corrected the condition.

Probable Cause

Unknown

Part # 1: 8118547170	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

Replacing the Driver's side headlight assembly corrected the condition.

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-5ZW130471		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-SET	Ref 31864-1	Date 11/2/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 19-Jul-2006	Odometer 20910 mi	VIN (confirm 17 characters): JTDKBB20U667 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
North America EDER Gr., Technical Dept. #1 Overseas Customer Service Technical Div. TOYOTA MOTOR CORPORATION Nisshin Education & Training Center 5-210, SAKAE, NISSHIN, AICH, 470-0113 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 8118547170	Part Description UNIT,	Qty. 1	Used Part Value \$ 47 .00		
	Comments:					
2	Part # 2:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
3	Part # 3:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
7	Part # 7:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
8	Part # 8:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-JOW131071		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CHI	Ref 31864-1	Date 11/7/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 05-Oct-2006	Odometer 24058 mi	VIN (confirm 17 characters): JTDKB20U673 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut							

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 08-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

The customer stated both head lights intermittently turn off then back on with the headlights in the on position.

Diagnostic Steps:

Terminal tension and wiring check good

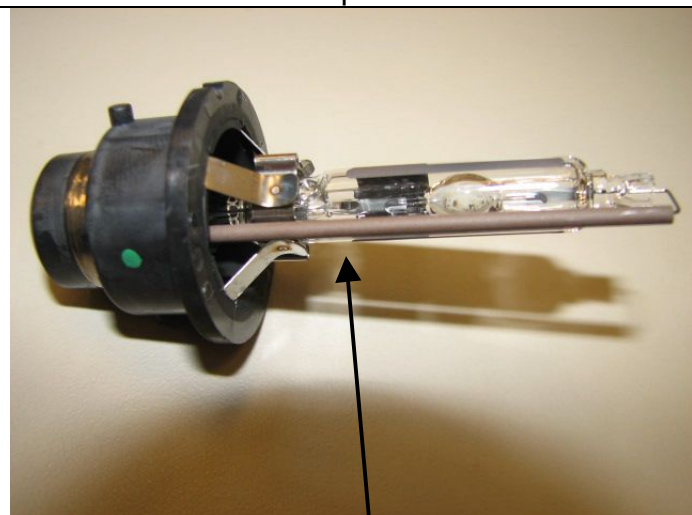
Probable Cause

unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

Both HID bulbs were replaced to correct the customers concern.



HID bulb

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JOW131071		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CHI	Ref 31864-1	Date 11/7/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 05-Oct-2006	Odometer 24058 mi	VIN (confirm 17 characters): JTDKKB20U673 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 2	Used Part Value \$ 46 .00
	Comments:					
2	Part # 1:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
3	Part # 1:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-JZW131171	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 11/7/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 07-Jul-2006	Odometer 39965 mi	VIN (confirm 17 characters): JTDKKB20U067 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 30-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

Intermittent operation of headlamps on 2006 Prius.

Diagnostic Steps:

Check power supply and grounds, swap headlamp bulbs with known good units, condition followed bulbs to KGU, problem unit repaired.

Probable Cause

Bad Headlamp bulbs

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Special request only	Parts Shipping Destination: N/A
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Repair Process

Replace both headlamp bulbs.

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JZW131171		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CAT	Ref 31864-1	Date 11/7/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 07-Jul-2006	Odometer 39965 mi	VIN (confirm 17 characters): JTDKKB20U067 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: N/A		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID	Qty. 2	Used Part Value \$ 46 .00		
	Comments:					
2	Part # 2:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
3	Part # 3:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
7	Part # 7:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
8	Part # 8:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					

TQCN DOC# FTR-50W133471	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 12/4/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 29-Aug-2006	Odometer 22221 mi	VIN (confirm 17 characters): JTDEKB20UX73 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 08-NOV-2007	Optional Ref.	Optional Approval
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Condition Description

- Customer states that the driver's side headlight intermittently fails to illuminate.

Diagnostic Steps:

- The condition was verified by cycling the headlight switch on and off repeatedly.
- The LH headlight would fail to illuminate one out of ten to fifteen cycles.
- The HID lamp was replaced without disturbing any other part of the system. This was done in an effort to isolate the concern to just the bulb or the connection to the bulb.
- The headlight switch was cycled from on to off more than 60 cycles.
- The condition could not be duplicated.

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Special request only	Parts Shipping Destination: N/A
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Repair Process

The HID bulb was replaced to correct the condition.



The numbers printed on the base of the bulb are:
PHILLIPS GERMANY
D4R XenEco 42406
0A6 DOT 35M 2F606

Place Picture 2 Here

FIELD TECHNICAL REPORT

TQCN DOC# FTR-50W133471	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 12/4/2007
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 29-Aug-2006	Odometer 22221 mi	VIN (confirm 17 characters): JTDKKB20UX73 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut						

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-50W133471		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-PT	Ref 31864-1	Date 12/4/2007
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 29-Aug-2006	Odometer 22221 mi	VIN (confirm 17 characters): JTDKKB20UX73 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: N/A		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID	Qty. 1	Used Part Value \$ 46 .00		
	Comments:					
2	Part # 2:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
3	Part # 3:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
7	Part # 7:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
8	Part # 8:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-JOW100381	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CHI	Ref 31864-1	Date 1/3/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 30-Aug-2006	Odometer 21530 mi	VIN (confirm 17 characters): JTDKB20U277 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 03-OCT-2007	Optional Ref.	Optional Approval
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Condition Description

The customer stated that the passenger side headlight is inoperative.

Diagnostic Steps:

- The right side headlight would intermittently stop emitting light
- No issue was found with the wiring or pin tension

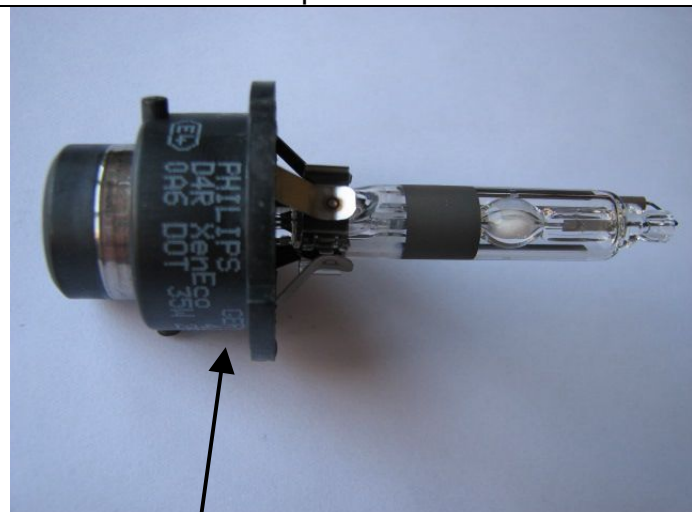
Probable Cause

An issue with the HID bulb.

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

The HID bulb was replaced to correct the customers concern.



Philips Germany, D4R XenEco 42406, E4 0A6
DOT 35W 2F619

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JOW100381		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CHI	Ref 31864-1	Date 1/3/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 30-Aug-2006	Odometer 21530 mi	VIN (confirm 17 characters): JTDKKB20U277 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value \$ 46 .00
	Comments:					
2	Part # 1:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
3	Part # 1:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

FIELD TECHNICAL REPORT

TQCN DOC# FTR-7ZW101781	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 31864-1	Date 1/23/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 26-Jun-2006	Odometer 34091 mi	VIN (confirm 17 characters): JTDKDB20U367 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 03-DEC-2007	Optional Ref.	Optional Approval
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Condition Description

Customer states headlights are intermittently inoperative.

Diagnostic Steps:

1. Technician verified customer concern.
2. Upon further diagnosis technician found intermittent open circuit in HID headlight bulb.


Probable Cause

Unknown.

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

The technician replaced both HID headlight bulbs to remedy the condition. The bulbs were returned to TMS via UPS for quality evaluation purposes. UPS tracking number 1Z 4X4 15X 06 3205 2933.

	
<p>HID headlight bulbs.</p>	<p>ID on bulb Phillips Germany D4R XenEco 0A6 DOT 35 W 42406 <u>2D621</u></p>

FIELD TECHNICAL REPORT

TQCN DOC# FTR-7ZW101781	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 31864-1	Date 1/23/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 26-Jun-2006	Odometer 34091 mi	VIN (confirm 17 characters): JTDKCB20U367 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						



ID on bulb

Phillips Germany
D4R XenEco
0A6 DOT 35 W
42406
2D620

Attachment 1: PRCS

TQCN DOC# FTR-7ZW101781		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-NY	Ref 31864-1	Date 1/23/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 26-Jun-2006	Odometer 34091 mi	VIN (confirm 17 characters): JTDKKB20U367 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit							



Attachment 1: **Parts Recovery Control Sheet**Orig
Tracking

VIN

Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先:	
		Tel:			Tel:	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID	Qty. 2	Used Part Value \$ 46 .00		
	Comments:					
2	Part # 2:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
3	Part # 3:	Part Description	Qty. 0	Used Part Value \$ 0 .00		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
7	Part # 7:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					
8	Part # 8:	Part Description	Qty.	Used Part Value \$.00		
	Comments:					

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JOW101581	Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CHI	Ref 31864-1	Date 1/23/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 22-Nov-2005	Odometer 53507 mi	VIN (confirm 17 characters): JTDKB20U863 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circuit						

Do not type in YELLOW shaded fields - Input data from Web page or RDM:

Repair Date 07-DEC-2007	Optional Ref.	Optional Approval
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Condition Description

The customer stated that the headlights are intermittently inoperative.

Diagnostic Steps:

The wiring and pin connections were checked with no problem found

Probable Cause

HID bulb issue

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQEC
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Repair Process

The bulbs were replaced to correct the condition.



HID bulbs

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# FTR-JOW101581		Affiliate TMS	Dept. QA-Electrical	Source FTS	Location TMS-CHI	Ref 31864-1	Date 1/23/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 22-Nov-2005	Odometer 53507 mi	VIN (confirm 17 characters): JTDKKB20U863 [REDACTED]	
Condition Title Exterior Lighting Head Light Open Circiut							

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN

Doc No.



Final Destination: CQEC		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel :	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 2	Used Part Value \$ 46 .00
	Comments:					
2	Part # 1:	Part Description			Qty.	Used Part Value \$.00
	Comments:					
3	Part # 1:	Part Description			Qty.	Used Part Value \$.00
	Comments:					

TQCN DOC# TQCN_FTR-080360035		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80267561	Date 02/13/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2006-03-29	Odometer 39735	VIN (confirm 17 characters): JTDKB20U963 [REDACTED]	
Condition Title HID Bulb							

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 12/27/2007	Optional Ref.	Optional Approval
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Condition Description

Customer states that the drivers headlight works intermittently. Previously, the passenger headlight was not working. The passenger bulb has been replaced already, customer is concerned with the quality of the bulb and the high cost of bulbs.

Diagnostic Steps:

- Technician could not duplicate the condition as described by the customer.
- FTS advised technician to replace the bulb

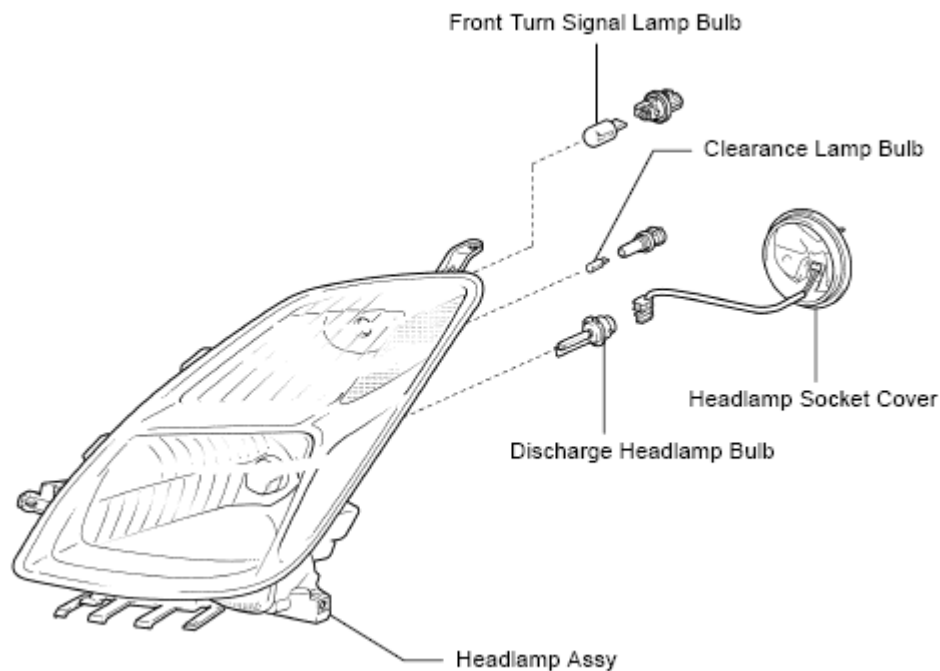
Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: No part available	Parts Shipping Destination: CQE
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Repair Process

Replacement of the bulb has repaired the vehicle to date. Customer is satisfied with the repair. Dealership personnel indicate that there have been many bulb replacements on Prius vehicles in recent months and customer is concerned with cost the high cost of the bulb.



Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080360035		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80267561	Date 02/13/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2006-03-29	Odometer 39735	VIN (confirm 17 characters): JTDKKB20U963 [REDACTED]	
Condition Title HID Bulb							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

TQCN DOC# TQCN_FTR-080520029	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80267561	Date 02/22/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 2005-11-21	Odometer 69850	VIN (confirm 17 characters): JTDKKB20U167 [REDACTED]	
Condition Title Headlight Abnormal Operation						

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 2/13/2008	Optional Ref.	Optional Approval
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Condition Description

Customer states that intermittently the right headlight will start to go dim then at times may go completely out. The customer will then turn the headlight switch off and back on again and the headlight will be illuminated. This is the second time for this issue. Replacement of the bulb will resolve the condition for about 13 months and then the condition occurs again. This is the third time for replacement of the bulb.

Diagnostic Steps:

- Customer brought the vehicle to the dealer with the bulb out.
 - Technician turned the headlights out and back on and the bulb was illuminated.
- Technician followed diagnostic for right bulb inoperative (see figure 1)
 - As per the repair manual the tech replaced the bulb

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: No part available	Parts Shipping Destination: CQE
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Repair Process

Replacement of the bulb has repaired the vehicle to date. Customer is satisfied with the repair.

Figure 1

Last Modified: 4-26-2007		1.6 T
Service Category: Vehicle Exterior		Section: Lighting (ext)
Model Year: 2006	Model: Prius	Doc ID: RM000001S6H000X
Title: LIGHTING: LIGHTING SYSTEM: PROBLEM SYMPTOMS TABLE (2006 Prius)		

PROBLEM SYMPTOMS TABLE

HINT:

- Use the table below to help determine the cause of the problem symptom. The potential causes of the symptoms are listed in order of probability in the "Suspected area" column of the table. Check each symptom by checking the suspected areas in the order they are listed. Replace parts as necessary.
- Inspect the fuses and relays related to this system before inspecting the suspected areas below.

Headlight and taillight system

SYMPTOM	SUSPECTED AREA	SEE PAGE
Low beam does not turn on (one side)	1. Bulb	-
	2. Wire harness	-
	3. Light control computer (HID)	-

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080520029		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80267561	Date 02/22/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2005-11-21	Odometer 69850	VIN (confirm 17 characters): JTDKKB20U167 [REDACTED]	
Condition Title Headlight Abnormal Operation							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

DEALERSHIP PRODUCT REPORT

TQCN DOC# TQCN_DPR-080500016	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 04213	Ref 80267561	Date 02/26/2008
Dealer Name PUTNAM TOYOTA		Dealer City BURLINGAME		State CA	Region SFR	
Primary Model Prius		Model Year 2006	Production Date 15-NOV-05	Odometer 43722 mi	VIN JTDKKB20U267 [REDACTED]	
Condition Title Headlight Intermittently Inoperative						

Qty.Reference 1 ADAM		YEE	Reference 2 (650) 340-6900	Reference 3 hyprvette@yahoo.com
Repair Date 2/19/2008	Optional Ref.		Applicable DTC Code(s)	

Condition Description

Customer states headlights intermittently go on and off

Diagnostic Steps:

Checked pin tension at HID ECU and power supply.

Probable Cause

Replacement of headlight bulbs

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Available on Request: Available upon request	Parts Shipping Destination: CQE
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Repair Process

Replaced bulbs

DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-080500016	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 04213	Ref 80267561	Date 02/26/2008
Dealer Name PUTNAM TOYOTA		Dealer City BURLINGAME		State CA	Region SFR	
Primary Model Prius		Model Year 2006	Production Date 15-NOV-05	Odometer 43722 mi	VIN JTDKKB20U267 [REDACTED]	
Condition Title Headlight Intermittently Inoperative						

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:		
North America EDER Gr., Technical Dept. #1 Overseas Customer Service Technical Div. TOYOTA MOTOR CORPORATION Nisshin Education & Training Center 5-210, SAKAE, NISSHIN, AICH, 470-0113 Japan		Attn:			宛先:		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value Each	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 2	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each	
	Comments:						

FIELD TECHNICAL REPORT

TQCN DOC# TQCN_FTR-080460030	Affiliate SET	Dept. QAElectrical	Source FTS	Location REG-SET	Ref 80267561	Date 02/27/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 2005-11-23	Odometer 51097	VIN (confirm 17 characters): JTDKKB20UX63 [REDACTED]	
Condition Title HID Headlight Intermittently Inoperative						

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 1/15/2008	Optional Ref.	Optional Approval
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Condition Description

- Headlight flicker after about 30 minutes of operation.
- Bulbs replaced 01/11/08 at dealer 10048 51297 miles with pt# 90981-20015 lot# 2H712.
- Headlight ECU's replaced 12/11/07 at 10094, 48665 miles.
- Bulb LOT # installed in vehicle at time of inspection 2H712.

Diagnostic Steps:

- After operating HID headlights for approx. ½ hour they started to flicker as stated by the customer.

Probable Cause

- Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair Process

- Replaced bulbs.
- Operated headlights 1 hr, condition did not return.

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080460030		Affiliate SET	Dept. QAElectrical	Source FTS	Location REG-SET	Ref 80267561	Date 02/27/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2005-11-23	Odometer 51097	VIN (confirm 17 characters): JTDKKB20UX63 [REDACTED]	
Condition Title HID Headlight Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 2	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

FIELD TECHNICAL REPORT

TQCN DOC# TQCN_FTR-080590015	Affiliate TMS	Dept. QAElectrical	Source FPE	Location TMS	Ref 80631165	Date 03/03/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 2006-11-11	Odometer 24078	VIN (confirm 17 characters): JTDKB20U177 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 2/6/2008	Optional Ref.	Optional Approval
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Condition Description

Customer states passenger side headlight is out

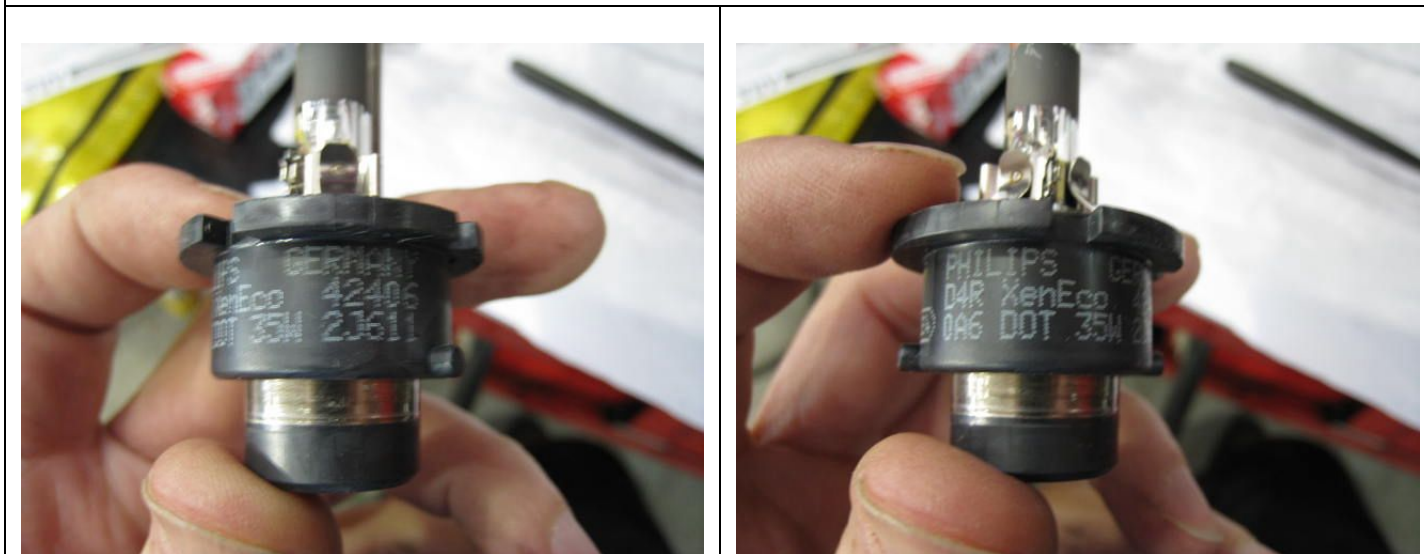
Diagnostic Steps:

Technician verified the customer's complaint and upon further diagnosis found the bulb to have a open

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair ProcessThe technician replaced the headlight bulb to remedy the condition
Part was shipped UPS for quality evaluation purposes to TMS

Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080590015		Affiliate TMS	Dept. QAElectrical	Source FPE	Location TMS	Ref 80631165	Date 03/03/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 2006-11-11	Odometer 24078	VIN (confirm 17 characters): JTDEKB20U177	
Condition Title HID Bulb Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

FIELD TECHNICAL REPORT

TQCN DOC# TQCN_FTR-080590017		Affiliate TMS	Dept. QAElectrical	Source FPE	Location TMS	Ref 80267561	Date 03/03/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2006-03-10	Odometer 31125	VIN (confirm 17 characters): JTDKKB20UX63 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative							

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 1/24/2008	Optional Ref.	Optional Approval
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Condition Description

Customer states passenger side headlight is out

Diagnostic Steps:

Technician verified the customer's complaint and upon further diagnosis found the bulb to have a open

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair Process

The technician replaced the headlight bulb to remedy the condition
Part was shipped UPS for quality evaluation purposes to TMS



Attachment 1: PRCS

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080590017		Affiliate TMS	Dept. QAElectrical	Source FPE	Location TMS	Ref 80267561	Date 03/03/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2006-03-10	Odometer 31125	VIN (confirm 17 characters): JTDKB20UX63 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

TQCN DOC# TQCN_FTR-080630054	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-NY	Ref 80267561	Date 03/03/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 2005-12-08	Odometer 28512	VIN (confirm 17 characters): JTDKB20U563 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Do not type in **YELLOW** shaded fields – This data is auto-populated from the TQCN system:

Repair Date 1/11/2008	Optional Ref.	Optional Approval
--------------------------	---------------	-------------------

Condition Description

Customer states headlight is intermittently inoperative.

Diagnostic Steps:

1. Technician verified customer concern.
2. Upon further diagnosis technician found intermittent open circuit in HID headlight bulb.

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair Process

The technician replaced the HID headlight bulbs to remedy the condition. The bulbs were returned to TMS via UPS for quality evaluation purposes.



HID Bulb.



ID on bulb
Phillips Germany
D4R XenEco
0A6 DOT 35 W
42406
2K521

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080630054		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-NY	Ref 80267561	Date 03/03/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2005-12-08		Odometer 28512	VIN (confirm 17 characters): JTDKB20U563 [REDACTED]
Condition Title HID Bulb Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking



VIN

JTDKB20U563140425

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)			Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan			Attn:			宛先 :	
			Tel:			Tel:	
T-STAR  							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer							FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID				Qty. 1	Used Part Value Each \$ 47.23
	Comments:						
2	Part # 2:	Part Description				Qty.	Used Part Value Each \$
	Comments:						
3	Part # 3:	Part Description				Qty.	Used Part Value Each \$
	Comments:						
4	Part # 4:	Part Description				Qty.	Used Part Value Each \$
	Comments:						
5	Part # 5:	Part Description				Qty.	Used Part Value Each \$
	Comments:						
6	Part # 6:	Part Description				Qty.	Used Part Value Each \$
	Comments:						
7	Part # 7:	Part Description				Qty.	Used Part Value Each \$
	Comments:						

TQCN DOC# TQCN_FTR-080700039		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80267561	Date 03/11/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2006-07-21	Odometer 19562	VIN (confirm 17 characters): JTDKKB20U163 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative							

Do not type in **YELLOW** shaded fields - Input data from Web page or RDM:

Repair Date 11/18/2007	Optional Ref.	Optional Approval
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Condition Description

- Customer states the Left hand head light doesn't work intermittently.

Diagnostic Steps:

- Concern was able to be duplicated in the shop.
- Technician inspected headlight circuit and found it to be working properly.
- Technician tested the headlight switch and found it to be working properly.
- Tested the headlight relay and found it to be working properly.
- Tested the Dim headlight relay and found it to be working properly.
- Checked connector fit on the headlight bulb and found it to be in good condition.

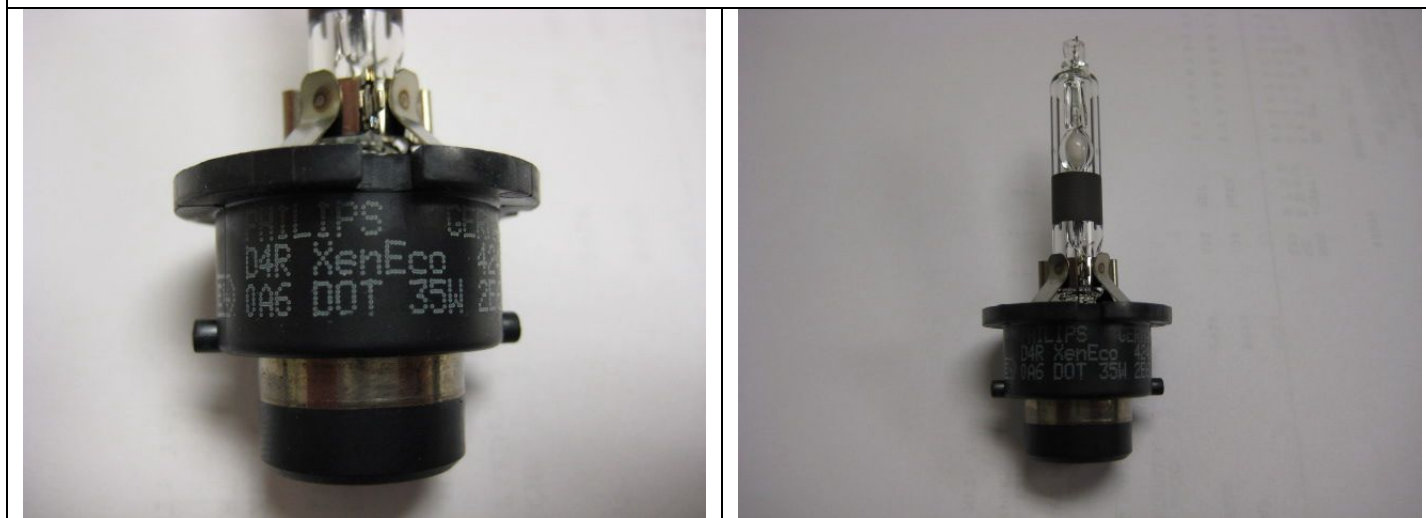
Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair Process

- Head light bulb was replaced with a new one and tested; the technician found this corrected the concern.



Attachment 1: PRCS

TQCN DOC# TQCN_FTR-080700039		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80267561	Date 03/11/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2006	Production Date 2006-07-21	Odometer 19562	VIN (confirm 17 characters): JTDKKB20U163 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :		
		Tel:			Tel:		
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

TQCN DOC# TQCN_FTR-080740019		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-NY	Ref 80278167	Date 03/14/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 2007-04-04		Odometer 31207	VIN (confirm 17 characters): JTDEKB20U377 [REDACTED]
Condition Title HID Bulb Intermittently Inoperative							

Do not type in **YELLOW** shaded fields – This data is auto-populated from the TQCN system:

Repair Date 1/18/2008	Optional Ref.	Optional Approval
--------------------------	---------------	-------------------

Condition Description

Customer states headlight is intermittently inoperative.

Diagnostic Steps:

1. Technician verified customer concern.
2. Upon further diagnosis technician found intermittent open circuit in HID headlight bulb.

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair Process

The technician replaced the HID headlight bulbs to remedy the condition. The bulbs were returned to TMS via UPS for quality evaluation purposes.



HID Bulb.



ID on bulb
Phillips Germany
D4R XenEco
0A6 DOT 35 W
42406
2B721

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-080740019		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-NY	Ref 80278167	Date 03/14/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 2007-04-04		Odometer 31207	VIN (confirm 17 characters): JTDKB20U377 [REDACTED]
Condition Title HID Bulb Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking



VIN

JTDKB20U377643578

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)			Deliver to:		住所 :		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan			Attn:		宛先 :		
			Tel:		Tel:		
T-STAR  							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
6	Part # 6:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
7	Part # 7:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

DEALERSHIP PRODUCT REPORT

TQCN DOC# TQCN_DPR-080780019	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 45072	Ref 80267561	Date 03/21/2008
Dealer Name KERN TOYOTA	Dealer City WINCHESTER	State VA	Region CAT			
Primary Model Prius	Model Year 2006	Production Date 22-JUN-06	Odometer 50776 mi	VIN JTDKKB20U167		
Condition Title HID Bulb Intermittently Inoperative						

Qty.Reference 1	Reference 2	Reference 3
Repair Date 3/11/2008	Optional Ref.	Applicable DTC Code(s)

Condition Description

The headlights will blink on and off and then just go off.

Diagnostic Steps:

Checked power to the HID computer and to the light bulb.

Probable Cause

Unknown.

Part # 1: 9098120015	Part # 2: 8110747150	Part # 3:	Parts Available on Request: Available upon request	Parts Shipping Destination: CQE
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Repair Process

Replaced the HID computer and bulb.

DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-080780019	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 45072	Ref 80267561	Date 03/21/2008
Dealer Name KERN TOYOTA		Dealer City WINCHESTER		State VA	Region CAT	
Primary Model Prius	Model Year 2006	Production Date 22-JUN-06	Odometer 50776 mi	VIN JTDKKB20U167 [REDACTED]		
Condition Title HID Bulb Intermittently Inoperative						

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking



VIN



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:	CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:		住所 :		
North America EDER Gr., Technical Dept. #1 Overseas Customer Service Technical Div. TOYOTA MOTOR CORPORATION Nisshin Education & Training Center 5-210, SAKAE, NISSHIN, AICH, 470-0113 Japan		Attn:		宛先 :		
		Tel:		Tel:		
T-STAR  						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value Each
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23
	Comments:					
2	Part # 2: 8110747150	Part Description COMPUTER SUB-ASSY, HDLP LIGHT CONT, RH			Qty. 1	Used Part Value Each \$ 39.23
	Comments:					
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$
	Comments:					

TQCN DOC# TQCN_FTR-080570057	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-NY	Ref 80278167	Date 03/24/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 2006-12-18	Odometer 19688	VIN (confirm 17 characters): JTDKB20U177 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Do not type in **YELLOW** shaded fields – This data is auto-populated from the TQCN system:

Repair Date 1/10/2008	Optional Ref.	Optional Approval
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Condition Description

Customer states headlight is intermittently inoperative.

Diagnostic Steps:

1. Technician verified customer concern.
2. Upon further diagnosis, technician found intermittent open circuit in HID headlight bulb.

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Have part / will ship	Parts Shipping Destination: CQE
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Repair Process

The technician replaced the HID headlight bulbs to remedy the condition. The bulbs were returned to TMS via UPS for quality evaluation purposes.



HID Bulb.



ID on bulb
Phillips Germany
D4R XenEco
0A6 DOT 35 W
42406
2K610

TQCN DOC# TQCN_FTR-080570057		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-NY	Ref 80278167	Date 03/24/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 2006-12-18		Odometer 19688	VIN (confirm 17 characters): JTDKKB20U177 [REDACTED]
Condition Title HID Bulb Intermittently Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking

VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)			Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan			Attn:			宛先 :	
			Tel:			Tel:	
T-STAR							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
6	Part # 6:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						
7	Part # 7:	Part Description			Qty.	Used Part Value Each \$	
	Comments:						

TQCN DOC# TQCN_FTR-080800022	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG- POP	Ref 80267561	Date 03/25/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 2006-06-30	Odometer 22824	VIN (confirm 17 characters): JTDEKB20U467 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Do not type in **YELLOW** shaded fields – This data is auto-populated from the TQCN system:

Repair Date 3/4/2008	Optional Ref.	Optional Approval
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Condition Description

Customer states that both headlights intermittently fail to illuminate.

Diagnostic Steps:

- The condition was verified by cycling the headlight switch on and off repeatedly.
- The LH and RH headlight would fail to illuminate one out of ten to fifteen cycles.
- The HID lamps were replaced without disturbing any other part of the system. This was done in an effort to isolate the concern to just the bulb or the connection to the bulb.
- The headlight switch was cycled from on to off more than 60 cycles and illuminated correctly every time.
- The failure to illuminate condition could not be duplicated.

Probable Cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Special request only	Parts Shipping Destination: CQE
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Repair Process

The HID bulbs were replaced to correct the condition.



The HR and LH HID bulbs have the same markings on the base.
The markings are:
Phillips Germany
D4R XenEco 42406

TQCN DOC# TQCN_FTR-080800022	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG- POP	Ref 80267561	Date 03/25/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2006	Production Date 2006-06-30	Odometer 22824	VIN (confirm 17 characters): JTDKB20U467 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking



VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination:	CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR  						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 2	Used Part Value Each \$ 47.23
	Comments:					
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value Each \$
	Comments:					

DEALERSHIP PRODUCT REPORT

TQCN DOC# TQCN_DPR-080840033	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 19063	Ref 80267561	Date 03/26/2008
Dealer Name DARCARS TOY. OF FREDERICK		Dealer City FREDERICK		State MD	Region CAT	
Primary Model Prius		Model Year 2006	Production Date 24-JAN-06	Odometer 35749 mi	VIN JTDKB20U063 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Repair Date 3/24/2008	Optional Ref.	Applicable DTC Code(s)
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Condition Description

- Passenger light inoperative

Diagnostic Steps:

- Inspected headlight bulb

Probable Cause

- Headlight bulb internal malfunction

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Available on Request: Available upon request	Parts Shipping Destination: CQE
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Repair Process

- Replace passenger headlight bulb
- Condition corrected.

DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-080840033	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 19063	Ref 80267561	Date 03/26/2008
Dealer Name DARCARS TOY. OF FREDERICK		Dealer City FREDERICK		State MD	Region CAT	
Primary Model Prius		Model Year 2006	Production Date 24-JAN-06	Odometer 35749 mi	VIN JTDKB20U063 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Attachment 1: Parts Recovery Control Sheet



Orig
Tracking
VIN



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:	CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR  						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value Each
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23
	Comments:					
2	Part # 2:	Part Description			Qty.	Used Part Value Each
	Comments:					
3	Part # 3:	Part Description			Qty.	Used Part Value Each
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value Each
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value Each
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value Each
	Comments:					

DEALERSHIP PRODUCT REPORT

TQCN DOC# TQCN_DPR-080640029	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 10108	Ref 80267561	Date 03/31/2008
Dealer Name CHEROKEE COUNTY TOYOTA		Dealer City CANTON		State GA	Region SET	
Primary Model Prius		Model Year 2006	Production Date 14-MAR-06	Odometer 40674 mi	VIN JTDKKB20U163 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Qty.Reference 1		Reference 2	Reference 3
Repair Date 3/4/2008	Optional Ref.	Applicable DTC Code(s)	

Condition Description

Right headlight pulsing or flashing

Diagnostic Steps:

Checked power and ground headlight assembly. headlight ECU - all good,

Probable Cause

Headlight Bulb

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Available on Request: Available upon request	Parts Shipping Destination: CQE
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Repair Process

Replaced bulb, few weeks later same concern,

DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-080640029	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 10108	Ref 80267561	Date 03/31/2008
Dealer Name CHEROKEE COUNTY TOYOTA		Dealer City CANTON		State GA	Region SET	
Primary Model Prius		Model Year 2006	Production Date 14-MAR-06	Odometer 40674 mi	VIN JTDKKB20U163 [REDACTED]	
Condition Title HID Bulb Intermittently Inoperative						

Attachment 1: Parts Recovery Control Sheet

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VIN



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:		CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所:		
North America EDER Gr., Technical Dept. #1 Overseas Customer Service Technical Div. TOYOTA MOTOR CORPORATION Nisshin Education & Training Center 5-210, SAKAE, NISSHIN, AICH, 470-0113 Japan		Attn:			宛先:		
		Tel:			Tel:		
T-STAR  							
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value Each	
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 47.23	
	Comments:						
2	Part # 2:	Part Description			Qty.	Used Part Value Each	
	Comments:						
3	Part # 3:	Part Description			Qty.	Used Part Value Each	
	Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each	
	Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each	
	Comments:						

TQCN DOC# TQCN_FTR-082940033	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-CHI	Ref 80278167	Date 10/21/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 2007-01-16	Odometer 28958	VIN (confirm 17 characters): JTDCB20U977 [REDACTED]	
Condition Title HID Bulb Inoperative						

Do not type in **YELLOW** shaded fields – This data is auto-populated from the TQCN system:

Repair Date 10/14/2008	Optional Ref.	Optional Approval
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Condition Description

- RH headlamp flickers when turning on, and then goes out.

Diagnostic Steps:

- Verified all connections. All OK.
- No water damage in headlamp assembly.

Probable Cause

- Unknown.

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Disposition: Part(s) Available	Parts Shipping Destination: CQE
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Repair Process

- Replaced the RH HID headlamp bulb. Concern resolved.



E4 "PHILIPS GERMANY
D4R XenEco 42406
0A6 DOT 35W 2H706"

RH Headlamp Bulb.

TQCN DOC# TQCN_FTR-082940033		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-CHI	Ref 80278167	Date 10/21/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 2007-01-16	Odometer 28958	VIN (confirm 17 characters): JTDKKB20U977 [REDACTED]	
Condition Title HID Bulb Inoperative							

Attachment 1: Parts Recovery Control Sheet

Orig
Tracking



VIN



Doc No.



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Final Destination: CQE		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR  						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 1	Used Part Value Each \$ 48.20
	Comments:					
2	Part # 2:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
3	Part # 3:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value Each \$
	Comments:					
7	Part # 7:	Part Description			Qty.	Used Part Value Each \$
	Comments:					

DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-082850005	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 29080	Ref 80267561	Date 10/29/2008
Dealer Name DCH FREEHOLD TOYOTA		Dealer City FREEHOLD		State NJ	Region NYR	
Primary Model Prius		Model Year 2006	Production Date 02-AUG-06	Odometer 35789 mi	VIN JTDKB20U767 [REDACTED]	
Condition Title HID Bulb Inoperative						

Repair Date 10/7/2008	Optional Ref.	Applicable DTC Code(s)
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Condition Description

Customer states passenger side HID bulb inoperative

Diagnostic Steps:

Visual, simulation method

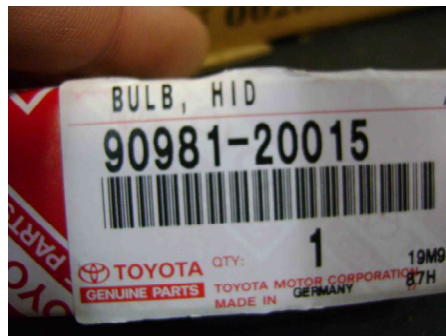
Probable Cause

I found that both of the HID bulbs were at fault.

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Available on Request: Available upon request	Parts Shipping Destination: CQE
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Repair Process

Replaced the HID bulbs



DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-082850005	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 29080	Ref 80267561	Date 10/29/2008
Dealer Name DCH FREEHOLD TOYOTA		Dealer City FREEHOLD		State NJ	Region NYR	
Primary Model Prius		Model Year 2006	Production Date 02-AUG-06	Odometer 35789 mi	VIN JTDKB20U767 [REDACTED]	
Condition Title HID Bulb Inoperative						

Attachment 1: Parts Recovery Control Sheet



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VIN



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:	CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR  						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value Each
1	Part # 1: 9098120015	Part Description BULB, HID	Qty. 2	Used Part Value Each \$ 48.2		
	Comments:					
2	Part # 2:	Part Description	Qty.	Used Part Value Each \$		
	Comments:					
3	Part # 3:	Part Description	Qty.	Used Part Value Each \$		
	Comments:					
4	Part # 4:	Part Description	Qty.	Used Part Value Each \$		
	Comments:					
5	Part # 5:	Part Description	Qty.	Used Part Value Each \$		
	Comments:					
6	Part # 6:	Part Description	Qty.	Used Part Value Each \$		
	Comments:					

TQCN DOC# TQCN_FTR-083010059	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80278167	Date 10/29/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 2006-09-04	Odometer 21623	VIN (confirm 17 characters): JTDKKB20U673 [REDACTED]	
Condition Title HID headlights inoperative						

Do not type in **YELLOW** shaded fields – This data is auto-populated from the TQCN system:

Repair Date 10/7/2008	Optional Ref.	Optional Approval
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Condition Description

- Technician states new right hand and left hand HID headlight assemblies and HID ECU's are inoperative.

Diagnostic Steps:

- Vehicle was in a wreck, body work was done, and new HID headlight assemblies were installed by the body shop.
- The body shop found the headlights did not work and sent vehicle to the dealership.
- The dealership technician found that there was both power and ground on the vehicles wiring harness for both headlights.
- Technician took "known good" headlights from a donor vehicle and found they worked on the customer vehicle.
- It was assumed by the technician that there was a problem with the new left hand and right hand HID ECU's.
- New ECU's were ordered and installed.
- Technician found headlight still did not work.
- When the known good headlights were compared to the new headlights, it was found that the wiring that runs from Headlight socket cover to the HID ECU was backwards so that the HID ECU was reverse biased. See Picture below.
- Point being that the connector on the back of the headlight socket cover can be installed right side up or upside down. In other words, there is no part of the design that prevents this connector from being installed upside down.

Probable Cause

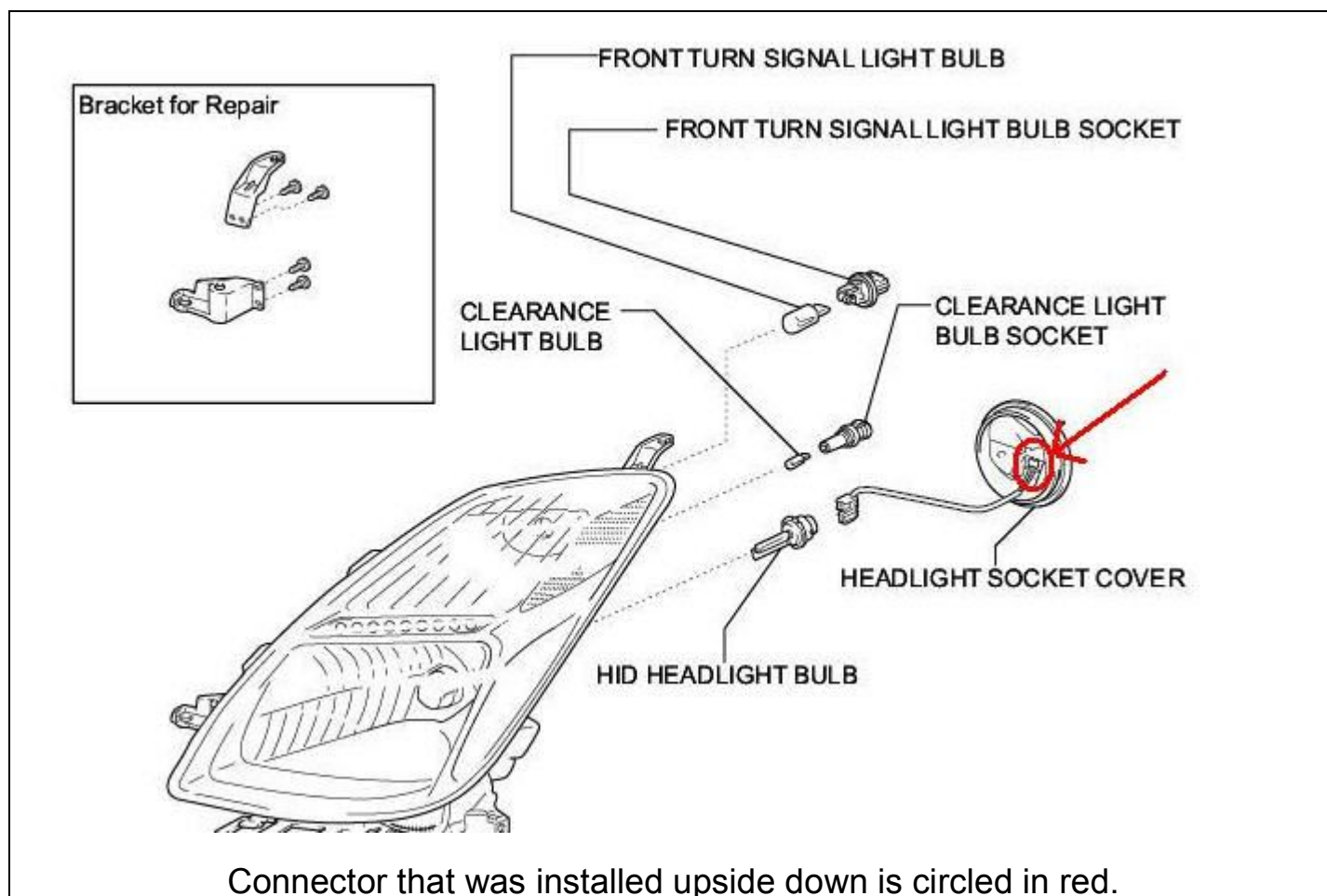
Body shop installed the connector on the back of the Headlight socket cover upside down, causing the HID ECU to be reverse biased.

Part # 1: N/A	Part # 2:	Part # 3:	Parts Disposition: No Part(s) Available	Parts Shipping Destination: CQE
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Repair Process

- Technician removed the connector and reinstalled right side up.
- The headlights work properly now.

TQCN DOC# TQCN_FTR-083010059	Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80278167	Date 10/29/2008
Problem Area Base Vehicle	Primary Model Prius	Model Year 2007	Production Date 2006-09-04	Odometer 21623	VIN (confirm 17 characters): JTDEKB20U673 [REDACTED]	
Condition Title HID headlights inoperative						



Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Orig
Tracking

VIN



Doc No.



Final Destination:	CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:		住所:		
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:		宛先:		
		Tel:		Tel:		
T-STAR		[Barcode]		[Barcode]		

FIELD TECHNICAL REPORT



TQCN DOC# TQCN_FTR-083010059		Affiliate TMS	Dept. QAElectrical	Source FTS	Location REG-POR	Ref 80278167	Date 10/29/2008
Problem Area Base Vehicle	Primary Model Prius		Model Year 2007	Production Date 2006-09-04	Odometer 21623	VIN (confirm 17 characters): JTDEKB20U673 [REDACTED]	
Condition Title HID headlights inoperative							

Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer					FOR CUSTOMS USE: Used Parts Value
1	Part # 1: N/A	Part Description n/a	Qty. 1	Used Part Value Each \$ 0.00	
	Comments:				
2	Part # 2:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				
3	Part # 3:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				
4	Part # 4:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				
5	Part # 5:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				
6	Part # 6:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				
7	Part # 7:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				

DEALERSHIP PRODUCT REPORT

TQCN DOC# TQCN_DPR-083520261	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 48035	Ref 80278167	Date 12/22/2008
Dealer Name JON LANCASTER TOYOTA		Dealer City MADISON		State WI	Region CHI	
Primary Model Prius		Model Year 2007	Production Date 25-JUN-07	Odometer 34090 mi	VIN JTDKB20U973 [REDACTED]	
Condition Title HID Bulb Inoperative						

Repair Date 12/15/2008	Optional Ref.	Applicable DTC Code(s)
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Condition Description

Customer states both headlights will go off at different times

Diagnostic steps:

- Technician inspected connector pins of headlight and ECU and both were found to be good.
- Technician followed diagnostic procedure of TSB 0030-08 and found the hid bulbs were the cause.

Probable cause

Unknown

Part # 1: 9098120015	Part # 2:	Part # 3:	Parts available on request: Available upon request	Parts shipping destination: CQE
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Repair process

Replaced HID bulbs in both sides.

DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-083520261	Affiliate TMS	Dept. QAElectrical	Source MDT/DS	Dealer Code 48035	Ref 80278167	Date 12/22/2008
Dealer Name JON LANCASTER TOYOTA		Dealer City MADISON		State WI	Region CHI	
Primary Model Prius		Model Year 2007	Production Date 25-JUN-07	Odometer 34090 mi	VIN JTDKB20U973	
Condition Title HID Bulb Inoperative						

Attachment 1: Parts Recovery Control Sheet



Orig
Tracking
VIN



Do not type in SHADED fields. If the **Final Destination** field below is "scrap", properly dispose of the part.

Doc No.



Final Destination:	CQE	SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			住所 :	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			宛先 :	
		Tel:			Tel:	
T-STAR  						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value Each
1	Part # 1: 9098120015	Part Description BULB, HID			Qty. 2	Used Part Value Each \$ 22.54
	Comments:					
2	Part # 2:	Part Description			Qty.	Used Part Value Each
	Comments:					
3	Part # 3:	Part Description			Qty.	Used Part Value Each
	Comments:					
4	Part # 4:	Part Description			Qty.	Used Part Value Each
	Comments:					
5	Part # 5:	Part Description			Qty.	Used Part Value Each
	Comments:					
6	Part # 6:	Part Description			Qty.	Used Part Value Each
	Comments:					

TQCN DOC# TQCN_FTR-090150014		Affiliate TMS		Dept. QAElectrical		Date 01/18/2009	
Primary Model Prius		Model Year 2007		Production Date 2007-02-27		Odometer 43000	
Source FTS		Location REG-NY		Problem Area Base Vehicle		VIN (confirm 17 characters): JTDKB20U873	
Part # 1: 8110747150		Part # 2: 5311147010		Part # 3: 8116521150		Parts Destination: CQE	
Condition Title Customer states head left front headlamp goes out intermittently.		Ref 80278167					

Condition Description

Customer states left front headlamp goes out intermittently.

Diagnostic Steps:

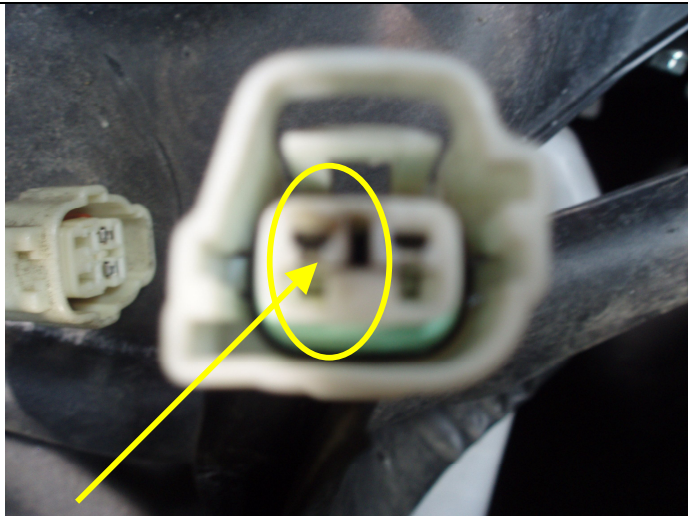
- Technician inspected and verified concern.
- Technician noted concern is intermittent.
- Technician noted no signs of moisture in left headlamp lense assembly.
- Technician states Left Front HID bulb was replaced on 1/5/09.
- Technician stated on inspection found discoloration of harness that connects to HID ECU to HID headlamp bulb.

Probable Cause

Unknown

Repair Process

Technician replaced both headlamp bulbs, HID ECU (LF), Harness (LF) and cover assembly.



Picture showing close up view of discoloration of female terminal.



Picture of HID ECU

TQCN DOC# TQCN_FTR-090150014		Condition Title Customer states head left front headlamp goes out intermittently			Date 01/18/2009
Primary Model Prius	Model Year 2007	Production Date 2007-02-27	Odometer 43000	VIN (confirm 17 characters): JTDEKB20U873 [REDACTED]	



Picture showing the following codes
42406
35W 2M614



Picture showing the following codes
D4R XERECO
0A6 Dot

TQCN DOC# TQCN_FTR-090150014		Condition Title Customer states head left front headlamp goes out			Date 01/18/2009
Primary Model Prius	Model Year 2007	Production Date 2007-02-27	Odometer 43000	VIN (confirm 17 characters): JTDEKB20U873 [REDACTED]	

Orig
Tracking

VIN

Doc No.

Attachment 1: Parts Recovery Control Sheet

Do not type in SHADED fields. If the Final Destination field below is "scrap", properly dispose of the part.

Final Destination: CQE		SETR#:		CQE Eng:	N/A	
Importer: (Applies to TMC Shipments Only)		Deliver to:			□□□	
Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Attn:			□□□	
		Tel:			Tel:	
T-STAR						
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer						FOR CUSTOMS USE: Used Parts Value
1	Part # 1: 8110747150	Part Description COMPUTER SUB-ASSY, HDLP LIGHT CONT, RH			Qty. 1	Used Part Value Each \$ 37.43
Comments:						
2	Part # 2: 5311147010	Part Description GRILLE, RADIATOR, CTR			Qty. 1	Used Part Value Each \$ 7.59
Comments:						
3	Part # 3: 8116521150	Part Description CORD,			Qty. 1	Used Part Value Each \$ 2.07
Comments:						
4	Part # 4:	Part Description			Qty.	Used Part Value Each \$
Comments:						
5	Part # 5:	Part Description			Qty.	Used Part Value Each \$
Comments:						
6	Part # 6:	Part Description			Qty.	Used Part Value Each \$
Comments:						
7	Part # 7:	Part Description			Qty.	Used Part Value Each \$
Comments:						

TQCN DOC# TQCN_DPR-090420011	Affiliate TMS	Dept. QAElectrical	Dealer Code 29080	Ref 80278167	Date 02/17/2009
Dealer Name DCH FREEHOLD TOYOTA	Dealer City FREEHOLD		State NJ	Region NYR	Source MDT/DS
Primary Model Prius	Model Year 2007	Production Date 19-JUL-07	Odometer 28114 mi	VIN JTDKB20U773 [REDACTED]	
Part # 1: 9098120015	Part # 2:	Part # 3:	Parts Destination: CQE	Parts Available: Available upon request	Repair Date 2/6/2009
Condition Title HID Headlight Abnormal Operation			Applicable DTC Code(s)		

Condition Description

Intermittently the low beams don't work or go out by themselves.

Diagnostic Steps:

Functionally tested the low beams and found that the left bulb goes out after 15-20 min and the right bulb takes almost 1 hour to go out.
Both headlight bulbs appear burnt inside at filament.

Probable Cause

Unknown

Repair Process





Replaced both front headlight bulbs.



DEALERSHIP PRODUCT REPORT



TQCN DOC# TQCN_DPR-090420011	Condition Title HID Headlight Abnormal Operation	Date 02/17/2009
---------------------------------	---	--------------------

Attachment 1: Parts Recovery Control Sheet		Orig Tracking	 		
Do not type in SHADED fields. If the Final Destination field below is "scrap", properly dispose of the part.		VIN			
		Doc No.			
Final Destination:	CQE	SETR#:		CQE Eng:	
Importer: (Applies to TMC Shipments Only) Mr. N. Okumura, Chief Expert Quality Div. Warranty Parts Room TOYOTA MOTOR CORPORATION 1 Toyota, Toyota-city, Aichi, 471-8571 Japan		Deliver to: Attn: Tel:		住所 : 宛先 : Tel:	
T-STAR  					
Note: If this FTR contains more than one VIN, create a table in the report containing VIN, production date, and odometer					FOR CUSTOMS USE: Used Parts Value Each
1	Part # 1: 9098120015	Part Description BULB, HID	Qty. 2	Used Part Value Each \$ 22.54	
	Comments:				
2	Part # 2:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				
3	Part # 3:	Part Description	Qty.	Used Part Value Each \$	
	Comments:				

**PE09-019
TOYOTA
RESPONSE 4
LAWSUIT**

**NOTICE OF VIOLATION OF CALIFORNIA CONSUMERS LEGAL REMEDIES ACT
AND DEMAND FOR RELIEF**

TO: TOYOTA MOTOR SALES, U.S.A., INC.

PLEASE TAKE NOTICE THAT, for the reasons stated below and because of the conduct alleged in the Complaint filed on May 1, 2009, in the United States District Court for the Central District of California in the lawsuit entitled [REDACTED] v. *Toyota Motor Sales, U.S.A., Inc.*, (the "Lawsuit"), you are in violation of California's Consumers Legal Remedies Act, Cal. Civ. Code section 1750, et seq.

This notice is served on you on behalf of Plaintiff [REDACTED] ("Plaintiff") and all members of the class of similarly situated persons he seeks to represent, as defined in the enclosed Complaint ("Class Members"). Please direct all communications or responses regarding this Notice to the following Plaintiff's counsel:

Eric H. Gibbs
Dylan Hughes
Geoffrey A. Munroe
GIRARD GIBBS, LLP
601 California Street, Floor 14
San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

LEGAL SERVICES

MAY - 5 2009

GROUP RECEIVED

Melissa M. Harnett
Gregory B. Scarlett
WASSERMAN, COMDEN & CASSELMAN, L.L.P.
5567 Reseda Boulevard, Suite 330
Post Office Box 7033
Tarzana, California 91357-7033
Telephone: (818) 705 6800
Facsimile: (818) 345 0162

STATEMENT OF VIOLATIONS

As described in the enclosed Complaint, Toyota Motor Sales, U.S.A., Inc. ("Toyota") failed to disclose to Plaintiff and to Class Members that the HID Headlight System installed in 2006 and 2007 Prius vehicles is defective and poses a safety hazard. Toyota's acts and practices in connection with the sale of 2006 and 2007 Prius vehicles, as set forth in the enclosed Complaint, are in violation of the Consumers Legal Remedies Act in that:

- (a) Toyota represents that goods and services have characteristics, uses, or benefits which they do not have, in violation of California Civil Code Section 1770(a)(5);

- (b) Toyota advertises goods and services with intent not to sell them as advertised, in violation of California Civil Code Section 1770(a)(9);
- (c) Toyota represents that a transaction confers or involves rights, remedies, or obligations which it does not have or involve, in violation of California Civil Code Section 1770(a)(14); and
- (d) Toyota represents that the subject of a transaction has been supplied in accordance with a previous representation when it has not, in violation of California Civil Code Section 1770(a)(16).

STATEMENT OF REMEDIES

PLAINTIFF HEREBY DEMANDS THAT WITHIN THIRTY (30) DAYS after the date on which this Notice is served on you, you remedy your violations by doing the following:

A. Disseminate a notice reasonably intended to reach all members of the Class defined in the Complaint, in a form approved by Plaintiff's counsel, setting forth:

- (1) The existence and a description of the Lawsuit, including a summary of the subject matter and the claims asserted;
- (2) The name, address, and telephone number of the attorneys who filed the Lawsuit on behalf of Plaintiff and the class; and
- (3) Each class member's right to participate in the Lawsuit.

B. Subject to monitoring and confirmation by Plaintiff's Counsel, offer to pay into a Court-approved escrow account an amount sufficient to repair defective HID Headlight Systems in 2006 and 2007 Prius vehicles, and to reimburse class members who have already paid to repair their vehicles' defective HID Headlight System.

C. Pay into a Court-approved escrow account an amount of money sufficient to pay Plaintiff's attorneys' fees and costs of suit.

Dated 5/1//2009

Case Activity Report

Case # : 200811240205

Case Type : PRIORITY

Owner's Group :

Brand : Toyota

Case/Activity Last Updated :

Case Title : SERVICE ; DIAGNOSIS ; I

CUSTOMER INFORMATION		VEHICLE INFORMATION		CASE INFORMATION	
NAME :	MR.	VIN :	JTDKB20U973	STATUS :	Closed
ADDR1 :		MODEL YR. :	2007	SUB-STATUS :	Completed
ADDR2 :		MODEL :	PRIUS	SOURCE :	CUSTOMER
CITY, STATE, ZIP :	HOLMES NY 1	GRADE :	Hybrid	INITIAL CHANNEL :	Call - Inbound
COUNTRY :	USA	MODEL NUMBER :	1224	OWNER :	GOHNK
PRIM. PHONE :		ENGINE :	1NZ	CREATED DATE :	11/24/2008 07:29:26
ALT PHONE :		TRANSMISSION :	CVT-E	CREATED BY :	KGOHN
FAX NUMBER :	--	SELLING DEALER CODE & NAME :	31161 CITY WORLD TOYOTA	CREATOR'S GROUP :	
EMAIL ADDRESS :		DOFU :	03/19/2007	CLOSED DATE :	12/10/2008 08:21:37
		CURRENT MONTHS :	20	CLOSED BY :	TMSLOAD
		CURRENT MILES :	50000	CLOSER'S GROUP :	
		INCIDENT MILES :	50000		
		CERTIFIED :	No		

DEALER INFORMATION		CLOSING SUMMARY	
PRIMARY DEALER CODE & NAME :	31161 CITY WORLD TOYOTA	CSAT :	
REGION CODE - NAME :	16 - New York	CLOSE APPROVED BY :	
DISTRICT :	01	CLOSE APPROVED :	
SECONDARY DEALER CODE & NAME :		# OF CLOSE EXTENSIONS :	0
REGION CODE - NAME :	-		
DISTRICT :			

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
03/14/2009 13:49:19 / Case Long Note	Done	GOHNK / Tier 2B Rep	Cust sts he was driving and advised he would like NCR to email him the case manager?s contact information. Cust provided email address	

This information is confidential and proprietary to Toyota ; Please refer to guidelines/policies for restrictions on use.

Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>*** NOTES 11/25/2008 08:56:30 AM KGohn</p> <p>+INTERNAL TO TMS+</p> <p>NCR unable to update customer information in KM as the server was down.</p> <p>*** NOTES 11/25/2008 09:28:18 AM KGohn</p> <p>+INTERNAL TO TMS+</p> <p>NCR sent email to customer instructing him to send ROs to [REDACTED] and adv case manager contact information and hours.</p> <p>*** NOTES 12/02/2008 03:49:23 PM KGohn</p> <p>+OUTGOING CUST CALL - [REDACTED]</p> <p>NCR l/m for cust adv have not received any faxes and wanted to see if he had faxed them yet. NCR adv can be reached at 800-331-4331 ext 73832 from 7:30-4:00 PST.</p> <p>*** NOTES 12/02/2008 03:49:52 PM KGohn</p> <p>+OUTGOING CUST CALL - [REDACTED] +</p> <p>NCR was advised the customer was gone for the day.</p> <p>*** NOTES 12/03/2008 12:57:47 PM KGohn</p> <p>+OUTGOING CUST CALL - 3 [REDACTED]</p> <p>NCR l/m for cust adv have not received any faxes and wanted to see if he had faxed them yet. NCR adv can be reached at 800-331-4331 ext 73832 from 7:30-4:00 PST</p> <p>*** NOTES 12/03/2008 12:58:59 PM KGohn</p> <p>+OUTGOING CUST CALL - ALT PHONE+</p> <p>NCR was advised Mr [REDACTED] was not there.</p>	

This information is confidential and proprietary to Toyota ; Please refer to guidelines/policies for restrictions on use.

Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>*** NOTES 12/03/2008 01:29:14 PM OJackson cllr requested to speak with Case Mgr. Per sametime NCR confrimed Case Mgr unavail. NCR adv cllr to allow 1 B/D for c/b.</p> <p>*** NOTES 12/04/2008 10:52:03 AM KGohn +OUTGOING CUST CALL - [REDACTED] NCR l/m for cust adv have not received any faxes and wanted to</p>	
03/14/2009 13:49:19 / Case Long Note	Done	GOHNK / Tier 2B Rep	<p>see if he had faxed them yet. NCR adv can be reached at 800-331-4331 ext 73832 from 7:30-4:00 PST.</p> <p>*** NOTES 12/05/2008 09:15:28 AM KGohn +OUTGOING CUST CALL - [REDACTED] NCR l/m for cust adv have not received any faxes and wanted to see if he had faxed them yet. NCR adv can be reached at 800-331-4331 ext 73832 from 7:30-4:00 PST.</p> <p>*** CASE CLOSE 12/10/2008 08:21:44 AM KGohn ==CLOSE SUMMARY==</p> <ol style="list-style-type: none"> Summary: Cust sks assist w/ HID concern. Action Taken: Case Managed Resolution/Position: NCR advised customer to send in documents for review after 2 weeks, no documents received. Closing case pending paperwork from customer. Cust Satisfied: unk Root Cause: Service; Diagnosis; 	

This information is confidential and proprietary to Toyota ; Please refer to guidelines/policies for restrictions on use.

Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			*** SUBCASE 200811240205-1 CLOSED 12/10/2008 08:21:47 AM KGohn	
03/14/2009 13:49:19 / Case Long Note	Done	GOHNK / Tier 2B Rep	<p>*** PHONE LOG 11/24/2008 07:37:35 AM PJanvier</p> <p>Caller states: Sts that the veh was having problems with the lights. Sts it would black out while he was driving. Sts he brought into the dlr several times & they could not find or duplicate the problem. Sts the last time he went they charged for a diag fee of \$85 & that it was the ballast that needed to be replaced. Sts he had the veh taken to an ind shop who replaced the HID & that corrected the problem. Sts that he was charged for an incorrect diag. Sks \$85 reimb....</p> <p>*** NOTES 11/24/2008 07:37:35 AM PJanvier</p> <p>..... for incoreect diag. NCR apol & adv cllr that the case will be fwd to a case mgr & a case mgr will f/u w/in 1 b/d.</p> <p>*** SUBCASE 200811240205-1 CREATED 11/25/2008 07:46:41 AM KGohn</p> <p>*** NOTES 11/25/2008 08:51:05 AM KGohn</p> <p>+OUTGOING DLR CALL - CITY WORLD TOYOTA+</p> <p>NCR l/m with service receptionist for SM requesting c/b to discuss case at 310-468-9545.</p> <p>*** PHONE LOG 11/25/2008 08:55:54 AM KGohn</p> <p>Action Type: Outgoing call</p> <p>+OUTGOING CUST CALL - [REDACTED]</p>	

This information is confidential and proprietary to Toyota ; Please refer to guidelines/policies for restrictions on use.

Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			NCR spoke w/ Mr. [REDACTED] who adv City World Toyota diag the vehicle with a concern with the ballast. Cust sts he was charged \$85.00 for the diag fee and he declined the work. Cust sts he then took the vehicle to an indep mechanic who replaced the HID module. Cust is seeking reimb for the \$85.00 diag fee at the Toyota dealer. NCR apol and adv would like to have him send a copy of the work order from the independent to NCR for review. NCR adv will f/u 12/2/08.	

This information is confidential and proprietary to Toyota ; Please refer to guidelines/policies for restrictions on use.

**Service of Process
Transmittal**

05/11/2009

CT Log Number 514841918



TO: Dorothy Sutton, Administrative Assistant
Toyota Motor Sales, U.S.A., Inc.
19001 S. Western Ave., HQ11
Torrance, CA 90501

LEGAL SERVICES

RE: Process Served in California

MAY 12 2009

FOR: Toyota Motor Sales, U.S.A., Inc. (Domestic State: CA)

GROUP RECEIVED

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Carlos Collado, on behalf of himself and all others similarly situated, Pltff. vs. Toyota Motor Sales, U.S.A., Inc., etc., Dft.

DOCUMENT(S) SERVED: Summons (2 sets), Complaint, Notice, Order (2 sets), Attachment(s), Declaration, Certification and Notice, Cover Sheet

COURT/AGENCY: United States District Court, Central District, CA
Case # CV093087

NATURE OF ACTION: Product Liability Litigation - Manufacturing Defect - Class Action - Failure to disclose a defect that poses an unreasonable safety risk to consumers - Defective high-intensity discharge headlights on Toyota Prius vehicles

ON WHOM PROCESS WAS SERVED: C T Corporation System, Los Angeles, CA

DATE AND HOUR OF SERVICE: By Process Server on 05/08/2009 at 14:25

APPEARANCE OR ANSWER DUE: Within 20 days after service (not counting the day you received it)

ATTORNEY(S) / SENDER(S): Eric H. Gibbs
Girard Gibbs LLP
601 California Street
Suite 1400
San Francisco, CA 94104
415-981-4800

ACTION ITEMS: SOP Papers with Transmittal, via Fed Ex Standard Overnight , 790665377240
Image SOP
Email Notification, Shari Goldsworthy shari_goldsworthy@toyota.com
Email Notification, Webster Burns webster_burns@toyota.com
Email Notification, Dorothy Sutton dorothe_sutton@toyota.com

SIGNED: C T Corporation System
PER: Nancy Flores
ADDRESS: 818 West Seventh Street
Los Angeles, CA 90017
TELEPHONE: 213-337-4615

5/2/09 2:25pm

Eric H. Gibbs (State Bar No. 178658)
Dylan Hughes (State Bar No. 209113)
Geoffrey A. Munroe (State Bar No. 228590)
GIRARD GIBBS LLP
601 California Street, Suite 1400
San Francisco, California 94104

LEGAL SERVICES

MAY 12 2009

GROUP RECEIVED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Carlos Collado, on behalf of himself and all others
similarly situated,

PLAINTIFF(S)

v.

Toyota Motor Sales, U.S.A., Inc.,
a California corporation,

DEFENDANT(S).

CASE NUMBER

CV09-3087 R (RCx)

SUMMONS

TO: DEFENDANT(S): Toyota Motor Sales, U.S.A., Inc.

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Girard Gibbs LLP, whose address is 601 California Street, 14th Floor, San Francisco, CA 94108. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAY - 1 2009

By: NATALIE LONGORIA
Deputy Clerk



1198

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Eric H. Gibbs (State Bar No. 178658)
Dylan Hughes (State Bar No. 209113)
Geoffrey A. Munroe (State Bar No. 228590)
GIRARD GIBBS LLP
601 California Street, Suite 1400
San Francisco, California 94104

LEGAL SERVICES

MAY 12 2009

GROUP RECEIVED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Carlos Collado, on behalf of himself and all others
similarly situated,

PLAINTIFF(S)

v.

Toyota Motor Sales, U.S.A., Inc.,
a California corporation,

DEFENDANT(S).

CASE NUMBER

CV09-3087 R (RCx)

SUMMONS

TO: DEFENDANT(S): Toyota Motor Sales, U.S.A., Inc.

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Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Girard Gibbs LLP, whose address is 601 California Street, 14th Floor, San Francisco, CA 94108. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAY - 1 2009

By: Natalie Gonzales
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Manuel Real and the assigned discovery Magistrate Judge is Rosalyn M. Chapman.

The case number on all documents filed with the Court should read as follows:

CV09- 3087 R (RCx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

FILED

COPY

1 Eric H. Gibbs (State Bar No. 178658)

2 ehg@girardgibbs.com

3 Dylan Hughes (State Bar No. 209113)

4 Geoffrey A. Munroe (State Bar No. 228590)

5 **GIRARD GIBBS LLP**

6 601 California Street, Suite 1400

7 San Francisco, California 94108

8 Telephone: (415) 981-4800

9 Facsimile: (415) 981-4846

10 Melissa M. Harnett (State Bar No. 164309)

11 mharnett@wccclaw.com

12 Gregory B. Scarlett (State Bar No. 131486)

13 **WASSERMAN, COMDEN & CASSELMAN, L.L.P.**

14 5567 Reseda Boulevard, Suite 330

15 Post Office Box 7033

16 Tarzana, California 91357-7033

17 Telephone: (818) 705-6800

18 Facsimile: (818) 345-0162

19 Attorney for Individual and Representative

20 Plaintiff Carlos Collado

21 **UNITED STATES DISTRICT COURT**

22 **CENTRAL DISTRICT OF CALIFORNIA**

23 Carlos Collado, on behalf of himself and
24 all others similarly situated,

25 Plaintiff,

26 v.

27 Toyota Motor Sales, U.S.A., Inc.,
28 a California corporation,

Defendant.

2009 MAY -1 PM 4:05

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

LEGAL SERVICES

MAY 12 2009

GROUP RECEIVED

Case No.

CV09-3087 R

CLASS ACTION

**COMPLAINT FOR EQUITABLE
RELIEF BASED ON:**

**(1) VIOLATION OF CONSUMERS
LEGAL REMEDIES ACT;**

**(2) VIOLATION OF UNFAIR
COMPETITION LAW.**

DEMAND FOR JURY TRIAL

VIA FAX

CLASS ACTION COMPLAINT

1 Plaintiff Carlos Collado, on behalf of himself and all others similarly situated,
2 alleges as follows:

3 **NATURE OF THE CASE**

4 1. Plaintiff and the class he proposes to represent own or lease 2006 and 2007
5 Toyota Prius vehicles that suffer from a dangerous but undisclosed safety defect. The
6 vehicles are factory installed with high-intensity discharge ("HID") headlights that
7 sporadically stop working while the vehicle is being driven.

8 2. Toyota has long been aware of the Prius's HID headlight problems, but
9 rather than alerting Prius owners of this safety hazard and offering to repair the vehicles,
10 Toyota is concealing the problem from its customers. As a result, Prius owners are
11 subject to dangerous driving conditions and traffic citations, as they often drive around
12 for months before realizing that their headlights sporadically stop working. And even
13 when Prius owners do finally discover the problem on their own, Toyota typically
14 charges them between \$300 and \$1,800 to replace part or all of the Prius's headlight
15 system with equally defective parts, resulting in further headlight failures and additional
16 repair expenses.

17 3. On behalf of himself and similarly situated Prius owners, Plaintiff alleges
18 that Toyota violated California's Consumers Legal Remedies Act and Unfair
19 Competition Law by failing to disclose a defect that poses an unreasonable safety risk to
20 consumers. Plaintiff seeks a judgment requiring Toyota to inform all class members of
21 the Prius's HID headlight problems and to make appropriate restitution to the class.

22 **PARTIES**

23 4. Plaintiff Carlos Collado is a citizen and resident of Kent, New York, located
24 in the County of Putnam.

25 5. Defendant Toyota Motor Sales, U.S.A., Inc. (Toyota) is a corporation
26 organized under the laws of the State of California and headquartered in Torrance,
27 California. Toyota is the U.S. sales, marketing, and distribution arm of its Japanese
28 parent company, Toyota Motor Corporation.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this action under the Class Action Fairness Act, 28 U.S.C. § 1332(d). The aggregated claims of the individual class members exceed the sum value of \$5,000,000, exclusive of interests and costs, and this is a class action in which more than two-thirds of the proposed plaintiff class, on the one hand, and Defendant Toyota, on the other, are citizens of different states.

7. This Court has jurisdiction over Toyota because it maintains its principal headquarters in California, is registered to conduct business in California, has sufficient minimum contacts in California, or otherwise intentionally avails itself of the markets within California, through promotion, sale, marketing and distribution of its vehicles in California, to render the exercise of jurisdiction by this Court proper and necessary. Moreover, Toyota's wrongful conduct (as described below) emanates from California.

8. Venue is proper in this District under 28 U.S.C. § 1391 because Toyota resides in this District and a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District.

SUBSTANTIVE ALLEGATIONS

9. Toyota promotes, sells, markets, and distributes automobiles in the United States sold under the "Toyota" brand name. These vehicles include the "Prius" brand which is the world's first mass-produced hybrid. In total, Toyota has sold more than 670,000 Prius vehicles in the U.S.

10. This lawsuit concerns 2006 and 2007 model year Prius vehicles that were factory installed with an optional HID headlight system ("Class Vehicles"). HID stands for high-intensity discharge, a technical term for the electric arc that produces the light. According to Toyota, HID headlights, which it also refers to as HID headlamps, are superior to halogen headlights (a less expensive headlight option for the Prius) because the light emitted is closer in color to sunlight; because the light shines ahead over a broader area of the road, as well as farther forward, to help increase driver visibility; and because HID headlights consume less power and last longer than regular halogen

1 headlights. The 2006 and 2007 Prius headlight system includes the HID bulb and ballast,
2 HID Electronic Control Unit (ECU), headlight assembly power circuit, and the associated
3 wiring and connectors ("HID Headlight System").

4 11. The HID Headlight System factory installed in class vehicles is defective, as
5 one or both headlights stop and then start working during use. The headlight failures are
6 unpredictable because they fail and then start working randomly and for differing
7 durations. There is no indication within the vehicle when the headlights fail, as the
8 dashboard panel remains illuminated. And because of the sporadic nature of the problem,
9 it is often difficult for consumers or service personnel to diagnose the headlight failures
10 through routine inspections or otherwise.

11 12. Toyota has a duty to disclose the HID Headlight System defect to Prius
12 owners because the defect poses an unreasonable safety hazard, because Toyota has
13 exclusive knowledge or access to the material facts and has known that these facts were
14 not known or reasonably discoverable by the Plaintiff or the Class members, and because
15 Toyota has actively concealed the HID Headlight System defect from its customers.

16 13. The defective HID Headlight System poses an unreasonable safety risk for
17 class members and others. Headlights are critical safety features that function to both
18 illuminate the road for the driver and to notify other vehicles and pedestrians of the
19 vehicle's presence. A defect that creates a propensity for one or both of the headlights to
20 intermittently stop working can easily lead to automobile accidents and moving-violation
21 penalties.

22 14. Safe and functional headlights were material to Plaintiff and Class members'
23 decisions to buy or lease a Prius. A reasonable consumer expects and assumes that when
24 they buy a vehicle, it includes safe and functional headlights. A reasonable consumer
25 further expects and assumes Toyota will not sell vehicles with known safety defects, such
26 as the HID Headlight System defect, and will disclose any such defect to its consumers.

27 15. Had Plaintiff and the other class members known of the HID Headlight
28 System defect, they would not have bought or leased Class Vehicles at the prices they

1 paid, if at all.

2 16. Toyota had exclusive knowledge of the HID Headlight System defect, and
3 knew that the defect was not known or reasonably discoverable by the Plaintiff and Class
4 members without experiencing the defect first hand (and thus exposing themselves to an
5 unreasonable safety hazard). Only Toyota had access to information about the significant
6 risk of intermittent headlight failure through its dealerships, pre-release testing data,
7 warranty data, customer complaint data, and replacement part sales data, among other
8 sources of aggregate information about the problem.

9 17. Toyota actively concealed the HID Headlight System defect from Plaintiff
10 and Class members. In addition to not notifying Prius owners and lessees of the defect or
11 implementing a recall, Toyota never notified Toyota dealerships of the problem. As a
12 result, when Prius owners brought their vehicles in for repair, Toyota dealerships were
13 often unaware that the headlight failures were a common and systematic problem and
14 were often unable to properly diagnose the problem. In addition, Toyota provided
15 equally defective HID Headlight System parts to its dealers for use in repairing Prius
16 owners and lessees' headlight problems. Toyota thus tried to give the impression that
17 any headlight problems were unique cases rather than part of a systematic defect.

18 18. When consumers present their vehicles to an authorized Toyota dealer for
19 repair of the HID Headlight System, consumers are typically told that they must pay for
20 the repair. Replacement and installation of a single HID headlight bulb costs hundreds of
21 dollars, while replacement of the entire HID Headlight system can cost as much as
22 \$1,800. These repairs typically only work temporarily, resulting in consumers paying for
23 further repairs to their HID Headlight System after the intermittent headlight failures
24 reoccur.

25 19. To this day, Toyota has still not notified Plaintiff and the proposed class of
26 Prius owners and lessees about the HID Headlight defect or offered to cover the cost of
27 repairs.

28 20. As a result of Toyota's practices, Plaintiff and Class members purchased

1 vehicles they otherwise would not have purchased, paid more for those vehicles than they
2 would have paid, and unnecessarily paid, and will continue to pay, to diagnose, repair,
3 and/or replace the HID Headlight System defect.

4 **PLAINTIFF'S EXPERIENCE**

5 21. In March 2007, Plaintiff Carlos Collado purchased a 2007 model year Prius
6 that came factory-equipped with an HID Headlight System.

7 22. Safe and functional headlights were and are important to Mr. Collado. Had
8 he known of the HID Headlight System defect, he would not have bought his Prius.

9 23. Toyota did not inform Mr. Collado that the Prius's HID Headlight System
10 was defective when he purchased his Prius, or at any other time. Mr. Collado has never
11 received any communication from Toyota concerning the Prius's headlights, and did not
12 know that the HID Headlight System was defective until after he discovered that his
13 Prius's headlights were failing.

14 24. In April 2008, Mr. Collado realized that his headlights had not been
15 functioning properly. He noticed that his right headlight was not working, although a
16 short time later it was working again.

17 25. Concerned, Mr. Collado promptly took his vehicle to a Toyota dealership for
18 repair. The Toyota dealership checked his Prius's HID Headlight System, but stated that
19 they could not duplicate the headlight failure, could not repair it, and did not know of any
20 problems with the HID Headlight System and/or its component parts.

21 26. One week later, Mr. Collado returned to the same dealership because he
22 continued to notice that his right headlight was not working on an intermittent basis. This
23 time the dealership told Mr. Collado that the right front ballast was sporadically
24 inoperative and needed replacing at a total cost of over \$650.

25 27. Shocked at the price and concerned that the dealership hadn't diagnosed the
26 problem in the first instance, Mr. Collado took his vehicle to an independent mechanic
27 for repair. The Toyota dealership charged Mr. Collado \$85 for its diagnoses. The
28 independent mechanic replaced the ballast with the Toyota part for a total cost of

1 \$487.68. The mechanic did not replace the bulb because it still worked.

2 28. Approximately one year later, in April 2009, Mr. Collado again had to pay
3 to repair his HID Headlight System after he noticed, once again, that one of his
4 headlights was not working. Mr. Collado took his Prius to an independent mechanic,
5 who replaced the HID bulb at a total cost of \$227.66.

6 29. So far, Mr. Collado, has spent \$800 to diagnose and repair his Prius's HID
7 Headlight System, which Toyota knew to be defective when it sold him the vehicle.

8 **CLASS ACTION ALLEGATIONS**

9 30. Plaintiff brings this action on behalf of himself and a class of persons
10 initially defined as follows:

11 All persons in the United States who own or lease a 2006 or 2007
12 model year Prius factory installed with HID headlights.

13 Excluded from the Class are Toyota; any affiliate, parent, or subsidiary of Toyota; any
14 entity in which Toyota has a controlling interest, any officer, director, or employee of
15 Toyota; any successor or assign of Toyota; anyone employed by counsel for Plaintiff in
16 this action; and any Judge to whom this case is assigned as well as his or her immediate
17 family.

18 31. This action has been brought and may properly be maintained on behalf of
19 the Class proposed above under the criteria of Rule 23 of the Federal Rules of Civil
20 Procedure.

21 32. Numerosity. Members of the class are so numerous that their individual
22 joinder herein is impracticable. Toyota has sold or leased tens of thousands of Prius
23 automobiles in the United States, with a substantial portion of those sales occurring in
24 California. Class members may be notified of the pendency of this action by mail,
25 supplemented (if deemed necessary or appropriate by the Court) by published notice.

26 33. Existence and predominance of common questions. Common questions of
27 law and fact exist as to all members of the class and predominate over questions affecting
28 only individual class members. These common questions include the following:

- a. whether Class Vehicles suffer from the HID Headlight System defect;
- b. whether the HID Headlight System defect constitutes an unreasonable safety risk;
- c. whether Toyota knows about the HID Headlight System defect and, if so, how long Toyota has known of the defect;
- d. whether the defective nature of the HID Headlight System constitutes a material fact;
- e. whether Toyota has a duty to disclose the defective nature of the HID Headlight System to Plaintiff and Class members.
- f. whether Toyota has violated the Consumers Legal Remedies Act, Civ. Code § 1750 *et seq.*, as alleged in this complaint;
- g. whether Toyota has engaged in unlawful, unfair, or fraudulent business practices in violation of Business and Professions Code section 17200 *et seq.*, as alleged in this complaint;
- h. whether Plaintiff and the other class members are entitled to equitable relief, including but not limited to a preliminary and/or permanent injunction.

34. Typicality. Plaintiff's claims are typical of the claims of the class, because, among other things, Plaintiff purchased a Class Vehicle, which contains the same HID Headlight System defect found in all other Class Vehicles.

35. Adequacy. Plaintiff is an adequate representative of the class because his interests do not conflict with the interests of the members of the class he seeks to represent. Plaintiff has retained counsel competent and experienced in complex class action litigation, and Plaintiff intends to prosecute this action vigorously. The interests of members of the class will be fairly and adequately protected by Plaintiff and his counsel.

36. Superiority. The class action is superior to other available means for the fair and efficient adjudication of this dispute. The injury suffered by each class member, while meaningful on an individual basis, is not of such magnitude as to make the

1 prosecution of individual actions against Toyota economically feasible. Even if class
2 members themselves could afford such individualized litigation, the court system could
3 not. In addition to the burden and expense of managing myriad actions arising from the
4 HID Headlight System defect, individualized litigation presents a potential for
5 inconsistent or contradictory judgments. Individualized litigation increases the delay and
6 expense to all parties and the court system presented by the legal and factual issues of the
7 case. By contrast, the class action device presents far fewer management difficulties and
8 provides the benefits of single adjudication, economy of scale, and comprehensive
9 supervision by a single court.

10 37. In the alternative, the class may be certified because:

- 11 a. the prosecution of separate actions by the individual members of the
12 class would create a risk of inconsistent or varying adjudication with
13 respect to individual class members which would establish
14 incompatible standards of conduct for Toyota;
15 b. the prosecution of separate actions by individual class members would
16 create a risk of adjudications with respect to them which would, as a
17 practical matter, be dispositive of the interests of other class members
18 not parties to the adjudications, or substantially impair or impede their
19 ability to protect their interests; and
20 c. Toyota has acted or refused to act on grounds generally applicable to
21 the class, thereby making appropriate final and injunctive relief with
22 respect to the members of the class as a whole.

23 **FIRST CAUSE OF ACTION**
24 **(Violation of the Consumers Legal Remedies Act,**
25 **Cal. Civ. Code §§ 1750, *et. seq.*)**

26 38. Plaintiff, on behalf of himself and all others similarly situated, realleges as if
27 fully set forth, each and every allegation set forth herein.

28 39. Toyota is a "person" within the meaning of Civil Code sections 1761(c) and

1 1770, and provided "goods" within the meaning of California Civil Code sections
2 1761(b) and 1770.

3 40. Plaintiff and members of the class are "consumers" within the meaning of
4 Civil Code sections 1761(d) and 1770, and have engaged in a "transaction" within the
5 meaning of Civil Code sections 1761(e) and 1770.

6 41. As set forth herein, Toyota's acts and practices, undertaken in transactions
7 intended to result and which did result in the sale or lease of Class Vehicles, violate
8 section 1770 of the Consumers Legal Remedies Act in that: (a) Toyota represents that its
9 goods have sponsorship, approval, characteristics, uses or benefits which they do not
10 have; (b) Toyota advertises its goods with intent not to sell them as advertised; (c) Toyota
11 represents that a transaction confers or involves rights, remedies, or obligations which it
12 does not have or involve; and (d) Toyota represents that its goods have been supplied in
13 accordance with a previous representation when they have not.

14 42. The acts and practices engaged in by Toyota that violate the Consumers
15 Legal Remedies Act include failing to disclose, at the point of sale or otherwise, that the
16 HID Headlight System is defective and poses a safety hazard.

17 43. Had Toyota adequately disclosed information about the HID Headlight
18 System defect, Plaintiff, Class members, and a reasonable consumer would have not
19 purchased, and/or would have paid less for their Class Vehicles.

20 44. Pursuant to the provisions of California Civil Code § 1780, Plaintiff seeks an
21 order enjoining Toyota from the unlawful practices described herein, a declaration that
22 Toyota's conduct violates the Consumers Legal Remedies Act, and attorneys' fees and
23 costs of litigation.

24 **SECOND CAUSE OF ACTION**

25 **(For unlawful, unfair, and fraudulent business practices under**
26 **Business and Professions Code section 17200 *et seq.*)**

27 45. Plaintiff, on behalf of himself and all others similarly situated, realleges as if
28 fully set forth, each and every allegation set forth herein.

1 46. Toyota's acts and practices, as alleged in this complaint, constitute unlawful,
2 unfair and/or fraudulent business practices, in violation of the Unfair Competition Law,
3 Cal. Bus. & Prof. Code § 17200, *et seq.*

4 47. The business practices engaged in by Toyota that violate the Unfair
5 Competition Law include, failing to disclose, at the point of sale or otherwise, that the
6 HID Headlight System is defective and poses a safety hazard.

7 48. Toyota engaged in unlawful business practices by violating the Consumers
8 Legal Remedies Act, Civil Code sections 1750 *et seq.*

9 49. Toyota engaged in unfair business practices by, among other things:

- 10 a. Engaging in conduct where the utility of that conduct is outweighed
11 by the gravity of the consequences to Plaintiff and other members of
12 the class;
13 b. Engaging in conduct that is immoral, unethical, oppressive,
14 unscrupulous, or substantially injurious to Plaintiff and other members
15 of the class; and
16 c. Engaging in conduct that undermines or violates the stated policies
17 underlying the CLRA, which seeks to protect consumers against
18 unfair and sharp business practices and to promote a basic level of
19 honesty and reliability in the marketplace.

20 50. Toyota engaged in fraudulent business practices by engaging in conduct that
21 was and is likely to deceive a reasonable consumer.

22 51. As a direct and proximate result of Toyota's unlawful, unfair and fraudulent
23 business practices as alleged herein, Plaintiff and Class members have suffered injury in
24 fact and lost money or property, in that they purchased Class Vehicles they otherwise
25 would not have, paid more for Class Vehicles than they otherwise would, paid for HID
26 Headlight System diagnoses, repairs, and replacements, and are left with Class Vehicles
27 of diminished value and utility because of the HID Headlight System defect. Meanwhile,
28 Toyota has sold more Class Vehicles and HID Headlight System parts than it otherwise

1 could have and charged inflated prices for Class Vehicles, unjustly enriching itself
2 thereby.

3 52. Plaintiff and Class members are entitled to equitable relief, including
4 restitution of all fees, restitutionary disgorgement of all profits accruing to Toyota
5 because of its unlawful, unfair and fraudulent, and deceptive practices, attorneys' fees
6 and costs, declaratory relief, and a permanent injunction enjoining Toyota from its
7 unlawful, unfair, fraudulent and deceitful activity.

8 **PRAYER**

9 WHEREFORE, Plaintiff, on Plaintiff's own behalf and on behalf of the Class,
10 pray for judgment as follows:

- 11 a. For an order certifying the Plaintiff Class and appointing Plaintiff and his
12 counsel to represent the Class;
- 13 b. For an order awarding Plaintiff and the members of the Class restitution, or
14 other equitable relief as the Court deems proper;
- 15 c. For an order enjoining Toyota from continuing to engage in unlawful
16 business practices, as alleged herein;
- 17 d. For an order awarding Plaintiff and the members of the Class pre-judgment
18 and post-judgment interest;
- 19 e. For an order awarding Plaintiff and the members of the Class reasonable
20 attorneys' fees and costs of suit, including expert witness fees; and
- 21 f. For an order awarding such other and further relief as this Court may deem
22 just and proper.

23 //

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26 //

27 //

28 //

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable as a matter of right.

DATED: May 1, 2009

Respectfully submitted,

By: 

Eric H. Gibbs

Dylan Hughes

Geoffrey A. Munroe

GIRARD GIBBS LLP

601 California Street, Suite 1400

San Francisco, California 94104

Telephone: (415) 981-4800

Facsimile: (415) 981-4846

Melissa M. Harnett

Gregory B. Scarlett

WASSERMAN, COMDEN &

CASSELMAN, L.L.P.

5567 Reseda Boulevard, Suite 330

Post Office Box 7033

Tarzana, California 91357-7033

Telephone: (818) 705-6800

Facsimile: (818) 345-0162

Attorney for Individual and Representative
Plaintiff Carlos Collado

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CARLOS COLLADO etc,)	
)	
Plaintiff(s),)	
)	
V.)	CV 09-3087-R
)	
TOYOTA MOTOR SALES,)	ORDER RE:
U.S.A., INC,)	NOTICE TO COUNSEL
Defendant(s).)	
_____)	

READ CAREFULLY: FAILURE TO COMPLY MAY LEAD TO SANCTIONS

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This case has been assigned to the calendar of Judge Manuel L. Real.

Counsel are advised that the Court expects strict compliance with the provisions of the Local Rules and the Federal Rules of Civil Procedure. NONCOMPLIANCE MAY LEAD TO THE IMPOSITION OF SANCTIONS WHICH MAY INCLUDE THE STRIKING OF PLEADINGS AND ENTRY OF JUDGMENT OR DISMISSAL OF THE ACTION.

The attention of counsel is particularly directed to Local Rule 16. Counsel should also be guided by the following special requirements when litigating cases assigned to Judge Real:

1. **INTERROGATORIES**: See Local Rules.

2. **MOTIONS**: Motions shall be heard on the first and third Monday of each month at 10:00 A.M., unless otherwise ordered by the Court. If the Monday is a national holiday, the succeeding Tuesday shall be the motion day. Counsel do not need to contact the Court in this regard, as there is no need to reserve dates.

NOTICE TO COUNSEL

PAGE 2

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3. EX PARTE APPLICATIONS: No hearing will be held unless deemed necessary by the Court; if the Court requires a hearing, the clerk will contact the parties and inform them of the date and time. In the moving papers' declaration of notification, the declarant shall state whether or not the application is opposed; if opposed, the declarant shall state that the opposing party was informed and has twenty-four (24) hours from receipt of the papers to file its opposition. The matter will then stand submitted.

4. CONTINUANCES: Counsel requesting a continuance must submit a stipulation with a detailed declaration as to the reason for the requested continuance or extension of time, together with a proposed order. Stipulations, including those for second and subsequent extensions of time to respond to the complaint, are effective **ONLY** when approved by this Court. Any stipulation not in compliance with this order or the Local Rules will automatically be denied without further notice to the parties.

5. CONFORMED COPIES: Parties will receive conformed copies through the Court's CM/ECF e-filing system; or by mail, if applicable.

6. REMOVED ACTIONS: Any answers filed in state court must be refiled in this Court as a supplement to the petition. Any pending motions must be renoticed in accordance with Local Rule 7.

7. WAIVED LOCAL RULES: (Local Rule 16-14.1): Settlement conferences are **NOT** mandatory; if the parties mutually agree to the holding of a settlement conference, they shall contact the clerk. (Local Rule 7-3): parties are **NOT** obligated to meet and confer, or file a declaration in connection thereto, for the purposes of preparing and filing dispositive motions (to dismiss, summary judgment, etc).

8. FEDERAL RULE 26(f): This Court requires the following, and counsel are **ORDERED** to follow this outline: 30 days after the first answering defendant files a response to the complaint, the parties shall hold an early meeting, in person, for the purpose of making initial disclosures. Plaintiff's counsel shall have the duty of scheduling the meeting. The parties shall then file a Joint Report of Early Meeting within 14 days of the holding of the Early Meeting of Counsel. Counsel are informed that approximately 30 days after receipt of the Joint Report, this Court shall issue an Order setting the dates of the Final Pre-Trial Conference, and the Trial of the action. This Court shall not

NOTICE TO COUNSEL

PAGE 3

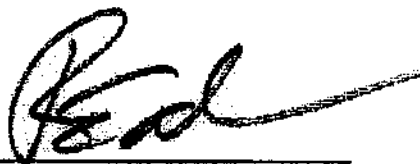
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set a "scheduling conference" or issue a "scheduling order" other than as set out previously in this section.

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10. **WORD/WORDPERFECT PROPOSED ORDERS, JUDGMENTS OR ANY OTHER SIGNATURE ITEMS:** Pursuant to General Order 08-02, a Microsoft Word or WordPerfect copy of any proposed document requiring a signature shall and must be e-mailed to the generic chambers e-mail address (r_chambers@cacd.uscourts.gov). The subject line of the e-mail shall be in the following format: court's divisional office, year, case type, case number, judge's initials and filer (party) name [e.g., 2:09 CV 09876 R (Plaintiff or Defendant's name)].

11. **NOTICE OF THIS ORDER:** Counsel for plaintiff, or plaintiff, if appearing on his or her own behalf, is responsible for promptly serving this notice on defendant's counsel, and filing a proof of service with the notice attached as an exhibit with the Court. If this case came to the Court via a Noticed Removal, this burden falls to the removing defendant.



MANUEL L. REAL
U. S. DISTRICT JUDGE

Date: May 7, 2009

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

**Attention:
New Civil Actions**

Pursuant General Order 08-02, you are required to e-mail a "Filed" stamped copy of your Initial filing in PDF format within 24 hours as follows:

- Complaint/Removal, Notice of Assignment to Magistrate Judge for Discovery (CV-18), Summons (CV-01A) and Civil Cover Sheet (CV-71) as one PDF attachment.
- Certification and Notice of Interested Parties (CV-30) as a separate PDF attachment.
- AO-120 or AO-121 (for Patent, Trademark, Copyright cases only) as a separate PDF attachment.
- Any other "Filed" documents that accompany the Complaint/Removal as separate PDF attachments.

☒ **CivilIntakeCourtDocs-LA@cacd.uscourts.gov**
(for cases numbers CV ##-####)

☐ **CivilIntakeCourtDocs-RS@cacd.uscourts.gov**
(for case numbers EDCV ##-####)

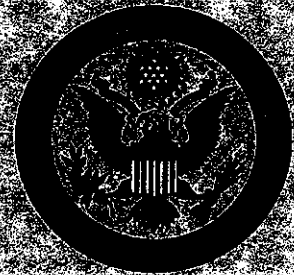
☐ **CivilIntakeCourtDocs-SA@cacd.uscourts.gov**
(for case numbers SACV ##-####)

The ECF Helpdesk can be reached at 213-894-0242 during business hours; Monday through Friday, 10:00 a.m. to 4:00 p.m. (PST). E-mail questions to: ecf-helpdesk@cacd.uscourts.gov

Subsequent documents e-mailed to above address will not be accepted. Please check General Order 08-02 for instructions on how to e-file documents.

UNITED STATES
DISTRICT COURT

CENTRAL DISTRICT OF
CALIFORNIA



Clerk's Office
Services for Attorneys
and the
General Public

March 2009

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1992

SECRET

WASHINGTON, D.C. 20540
U.S. DEPARTMENT OF
COMMERCE
BUREAU OF ECONOMIC ANALYSIS
WASHINGTON, D.C. 20540

1. The first step is to identify the problem. In this case, the problem is that the system is not working properly.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CARLOS COLLADO etc,

Plaintiff(s),

V.

**TOYOTA MOTOR SALES,
U.S.A., INC,**

Defendant(s).

CV 09-3087-R

**ORDER RE:
NOTICE TO COUNSEL**

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NOTICE TO COUNSEL

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NOTICE TO COUNSEL

PAGE 3

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MANUEL L. REAL
U. S. DISTRICT JUDGE

Date: May 7, 2009

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CIVILITY AND PROFESSIONALISM GUIDELINES

Preamble

In its purest form, law is simply a societal mechanism for achieving justice. As officers of the court, judges and lawyers have a duty to use the law for this purpose, for the good of the people. Even though "justice" is a lofty goal, one which is not always reached, when an individual becomes a member of the legal profession, he or she is bound to strive towards this end.

*...there is a growing sense that
lawyers regard their livelihood as a business,
rather than a profession.*

Unfortunately, many do not perceive that achieving justice is the function of law in society today. Among members of the public and lawyers themselves, there is a growing sense that lawyers regard their livelihood as a business, rather than a profession. Viewed in this manner, the lawyer may define his or her ultimate goal as "winning" any given case, by whatever means possible, at any cost, with little sense of whether justice is being served. This attitude manifests itself in an array of obstinate discovery tactics, refusals to accommodate the reasonable requests of opposing counsel re: dates, times, and places; and other needless, time-consuming conflicts between and among adversaries. This type of behavior tends to increase costs of litigation and often leads to the denial of justice.

The Central District recognizes that, while the majority of lawyers do not behave in the above-described manner, in recent years there has been a discernible erosion of civility and professionalism in our courts. This disturbing trend may have severe consequences if we do not act to reverse its course. Incivil behavior does not constitute effective advocacy; rather, it serves to increase liti-

gation costs and fails to advance the client's lawful interests. Perhaps just as importantly, this type of behavior causes the public to lose faith in the legal profession and its ability to benefit society. For these reasons, we find that civility and professionalism among advocates, between lawyer and client, and between bench and bar are essential to the administration of justice.

The following guidelines are de-

signed to encourage us, the members of the bench and bar, to act towards each other, our clients, and the public with the dignity and civility that our profession demands. In formulating these guidelines, we have borrowed heavily from the efforts of others who have written similar codes for this same purpose. *The Los Angeles County Bar Association Litigation Guidelines*, guidelines issued by other county bar associations within the Central District, the *Standards for Professional Conduct within the Seventh Federal Judicial Circuit*, and the *Texas Lawyer's Creed* all provide excellent models for professional behavior in the law.

We expect that judges and lawyers will voluntarily adhere to these standards as part of a mutual commitment to the elevation of the level of practice in our courts. These guidelines shall not be used as a basis for litigation or for sanctions or penalties.

Nothing in these guidelines supercedes or modifies the existing Local Rules of the Central District, nor do they alter existing standards of conduct wherein lawyer negligence may be determined and/or examined.

I. Guidelines

A. Lawyers' Duties to Their Clients

1. We will practice our profession with a continuing awareness that our role is to advance the legitimate interests of our clients. We will endeavor to achieve our clients' lawful objectives in legal transactions and in litigation as quickly and economically as possible.
2. We will be loyal and committed to our clients' lawful objectives, but we will not permit that loyalty and commitment to interfere with our duty to provide objective and independent advice.
3. We will advise our clients that civility and courtesy are expected and are not a sign of weakness.
4. We will treat adverse parties and witnesses with fairness and due consideration. A client has no right to demand that we act in an abusive manner or indulge in any offensive conduct.
5. We will advise our clients that we will not pursue conduct that is intended primarily to harass or drain the financial resources of the opposing party.
6. We will advise our clients that we reserve the right to determine whether to grant accommodations to opposing counsel in all matters that do not adversely affect our clients' lawful objectives. Clients have no right to instruct us to refuse reasonable requests made by other counsel.
7. We will advise our clients regarding availability of mediation, arbitration, and other alternative meth-

ods of resolving and settling disputes.

8. We will advise our clients of the contents of this creed when undertaking representation.

B. Lawyers' Duties to Other Counsel

1. Communications with Adversaries

- a. We will adhere to all express promises and to agreements with other counsel, whether oral or in writing, and will adhere in good faith to all agreements implied by the circumstances or local customs.
- b. When we reach an oral understanding on a proposed agreement or a stipulation and decide to commit it to writing, the drafter will endeavor in good faith to state the oral understanding accurately and completely. The drafter will provide the other counsel with the opportunity to review the writing. As drafts are exchanged between or among counsel, changes from prior drafts will be identified in the draft or otherwise explicitly brought to the attention of other counsel. We will not include in a draft matters to which there has been no agreement without explicitly advising other counsel in writing of the addition.
- c. We will not write letters for the purpose of ascribing to opposing counsel a position he or she has not taken, or to create "a record" of events that have not occurred. Letters intended only to make a record should be used sparingly and only when thought to be necessary under all of the circumstances. Unless specifically permitted or invited by the court, letters between counsel should not be sent to judges.

2. Scheduling Issues

- a. We will not use any form of discovery or discovery scheduling as a means of harassment.
- b. We will consult other counsel regarding scheduling matters in a good faith effort to avoid scheduling conflicts.
- c. We will endeavor to accommodate previously scheduled dates for hearings, depositions, meetings, conferences, vacations, seminars, or other functions that produce good faith calendar conflicts on the part of other counsel, where it is possible to do so without prejudicing the client's rights. If we have been given an accommodation because of a calendar conflict, we will notify those who have accommodated us as soon as the conflict has been removed.
- d. We will notify other counsel and, if appropriate, the court or other persons, at the earliest possible time when hearings, depositions, meetings, or conferences are to be canceled or postponed. Early notice avoids unnecessary travel and expense of counsel and may enable the court to use the previously reserved time for other matters.
- e. Unless time is of the essence, as a matter of courtesy we will grant first requests for reasonable extensions of time to respond to litigation deadlines. After a first extension, any additional requests for time will be considered by balancing the need for expedition against the deference one should ordinarily give to an opponent's schedule of personal and professional engagements, the reasonableness of the length of extension requested, the opponent's willingness to grant reciprocal extensions, the time actually needed for the task, and whether it is likely a court would grant the extension if asked to do so.

- f. We will not request an extension of time solely for the purpose of unjustified delay or to obtain a tactical advantage.

- g. We will not attach to extensions unfair and extraneous conditions. We may impose conditions for the purpose of preserving rights that an extension might jeopardize, or for seeking reciprocal scheduling concessions. We will not, by granting extensions, seek to preclude an opponent's substantive rights, such as his or her right to move against a complaint.

3. Service of Papers

- a. We will not time the filing or service of motions or pleadings in any way that unfairly limits another party's opportunity to respond.
- b. We will not serve papers sufficiently close to a court appearance so as to inhibit the ability of opposing counsel to prepare for that appearance or, where permitted by law, to respond to the papers.
- c. We will not serve papers in order to take advantage of an opponent's known absence from the office or at a time or in a manner designed to inconvenience an adversary, such as late on a Friday afternoon or the day preceding a secular or religious holiday.
- d. When it is likely that service by mail, even when allowed, will prejudice the opposing party, we will effect service personally or by facsimile transmission.

4. Depositions

- a. We will take depositions only when actually needed to ascertain facts or information or to perpetuate testimony. We will not take depositions

- d. In civil actions, we will stipulate to relevant matters if they are undisputed and if no good faith advocacy basis exists for not stipulating.
- e. Unless directly and necessarily in issue, we will not disparage the intelligence, morals, integrity, or personal behavior of our adversaries before the court, either in written submissions or oral presentations.
- f. We will not, absent good cause, attribute bad motives or improper conduct to other counsel or bring the profession into disrepute by unfounded accusations of impropriety.
- g. We will not move for court sanctions against opposing counsel without first conducting a reasonable investigation, and unless fully justified by the circumstances and necessary to protect our client's lawful interests.
- h. We will not cause any default or dismissal to be entered without first notifying opposing counsel, when we know his or her identity.
- i. When a draft order is to be prepared by counsel to reflect a court ruling, we will draft an order that accurately and completely reflects the court's ruling. We will promptly prepare and submit a proposed order to other counsel and attempt to reconcile any differences before the draft order is presented to the court.

9. *Ex Parte* Communications With the Court

- a. We will avoid *ex parte* communication on the substance of a pending case with a judge (or his or her law clerk) before whom such case is pending.
- b. Even where applicable laws or rules permit an *ex parte* application or communication to the court, before making such an application or com-

munication we will make diligent efforts to notify the opposing party or his or her attorney. We will make reasonable efforts to accommodate the schedule of such attorney, so that the opposing party may be represented on the application.

- c. Where the rules permit an *ex parte* application or communication to the court in an emergency situation, we will make such an application or communication only where there is a *bona fide* emergency such that the lawyer's client will be seriously prejudiced by a failure to make the application or communication on regular notice.

C. Lawyers' Duties to the Court

- 1. We will speak and write civilly and respectfully in all communications with the court.
- 2. We will be punctual and prepared for all court appearances so that all hearings, conferences, and trials may commence on time; if delayed, we will notify the court and counsel, if possible.
- 3. We will be considerate of the time constraints and pressures on the court and court staff inherent in their efforts to administer justice.
- 4. We will not engage in any conduct that brings disorder or disruption to the courtroom. We will advise our clients and witnesses appearing in court of the proper conduct expected and required there and, to the best of our ability, prevent our clients and witnesses from creating disorder or disruption.
- 5. We will not write letters to the court in connection with a pending action, unless invited or permitted by the court.

- 6. Before dates for hearing or trials are set, or if that is not feasible, immediately after such date has been set, we will attempt to verify the availability of necessary participants and witnesses so we can promptly notify the court of any likely problems.
- 7. We will act and speak civilly to court marshals, court clerks, court reporters, secretaries, and law clerks with an awareness that they, too, are an integral part of the judicial system.

D. Judges' Duties to Others

- 1. We will be courteous, respectful, and civil to the attorneys, parties, and witnesses who appear before us. Furthermore, we will use our authority to ensure that all of the attorneys, parties, and witnesses appearing in our courtrooms conduct themselves in a civil manner.
- 2. We will do our best to ensure that court personnel act civilly toward attorneys, parties and witnesses.
- 3. We will not employ abusive, demeaning, or humiliating language in opinions or in written or oral communications with attorneys, parties, or witnesses.
- 4. We will be punctual in convening all hearings, meetings, and conferences.
- 5. We will make reasonable efforts to decide promptly all matters presented to us for decision.
- 6. While endeavoring to resolve disputes efficiently, we will be aware of the time constraints and pressures imposed on attorneys by the exigencies of litigation practice.
- 7. Above all, we will remember that the court is the servant of the people, and we will approach our duties in this fashion.

FILED

2009 MAY -1 PM 4:05

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

Eric H. Gibbs (State Bar No. 178658)
ehg@girardgibbs.com
Dylan Hughes (State Bar No. 209113)
Geoffrey A. Munroe (State Bar No. 228590)
GIRARD GIBBS LLP
601 California Street, Suite 1400
San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

Melissa M. Harnett (State Bar No. 164309)
mharnett@wcclaw.com
Gregory B. Scarlett (State Bar No. 131486)
WASSERMAN, COMDEN & CASSELMAN, L.L.P.
5567 Reseda Boulevard, Suite 330
Post Office Box 7033
Tarzana, California 91357-7033
Telephone: (818) 705-6800
Facsimile: (818) 345-0162

Attorney for Individual and Representative
Plaintiff Carlos Collado

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Carlos Collado, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

Toyota Motor Sales, U.S.A., Inc.,
a California corporation,

Defendant.

Case No. **CV09-3087**

CLASS ACTION

**DECLARATION OF
PLAINTIFF'S COUNSEL
PURSUANT TO CALIFORNIA
CIVIL CODE SECTION 1780(c)**

VIA FAX

**DECLARATION OF PLAINTIFF'S COUNSEL
PURSUANT TO CALIFORNIA CIVIL CODE SECTION 1780(c)**

1 I, Eric H. Gibbs, declare as follows:


2 1. I am a partner with Girard Gibbs LLP, counsel for Plaintiff in this action. I
3 have personal knowledge of the facts stated herein and, if called upon to do so, could and
4 would testify competently thereto.

5 2. I submit this declaration on behalf of Plaintiff and in support of Plaintiff's
6 Class Action Complaint, which is based in part on violations of the Consumers Legal
7 Remedies Act, California Civil Code §§ 1750 *et seq.*

8 3. Plaintiff's Class Action Complaint has been filed in the proper place for trial
9 of this action, which is Los Angeles County. Toyota Motor Sales, U.S.A., Inc. is
10 headquartered and conducts substantial business, including the acts and practices at issue
11 in this action, within Los Angeles County.

12 I declare under penalty of perjury that the foregoing is true and correct. Executed
13 on May 1, 2009, at San Francisco, California.

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Eric H. Gibbs

NAME, ADDRESS & TELEPHONE NUMBER OF ATTORNEY(S) FOR, OR, PLAINTIFF OR
DEFENDANT IF PLAINTIFF OR DEFENDANT IS PRO PER

Eric H. Gibbs (State Bar No. 178658)
Dylan Hughes (State Bar No. 209113)
Geoffrey A. Munroe (State Bar No. 228590)
GIRARD GIBBS LLP
601 California Street, Suite 1400
San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

ATTORNEYS FOR:

FILED

2009 MAY -1 PM 4:05

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Carlos Collado, on behalf of himself and all others
similarly situated,

Plaintiff(s),

v.

Toyota Motor Sales, U.S.A., Inc.,
a California corporation,

Defendant(s)

CASE NUMBER

CV09-3087 R

(RCx)

CERTIFICATION AND NOTICE
OF INTERESTED PARTIES
(Local Rule 7.1-1)

TO: THE COURT AND ALL PARTIES APPEARING OF RECORD:

The undersigned, counsel of record for Plaintiff Carlos Collado
(or party appearing in pro per), certifies that the following listed party (or parties) has (have) a direct, pecuniary
interest in the outcome of this case. These representations are made to enable the Court to evaluate possible
disqualification or recusal. (Use additional sheet if necessary.)

PARTY

CONNECTION

(List the names of all such parties and identify their connection and interest.)

Carlos Collado
Toyota Motor Sales, U.S.A., Inc.
Toyota Motor Corporation

Plaintiff
Defendant
Defendant's parent company

5/1/09

Date

Sign

Eric H. Gibbs

Attorney of record for or party appearing in pro per

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETI (a) PLAINTIFFS (Check box if you are representing yourself ☐
Carlos Collado, on behalf of himself and all others similarly situatedDEFENDANTS
Toyota Motor Sales, U.S.A., Inc., a California corporation

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

Eric H. Gibbs, Dylan Hughes, Geoffrey A. Munroe - Girard Gibbs LLP
601 California Street, 14th Floor, San Francisco, CA 94108
TEL: (415) 981-4800

Attorneys (If Known)

N/A

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant.)

- | | | | | | |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)CLASS ACTION under F.R.C.P. 23: ☒ Yes ☐ No☐ MONEY DEMANDED IN COMPLAINT: \$VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
28 USC 1332(d), violation of state consumer protection statutes

VII. NATURE OF SUIT (Place an X in one box only.)

<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Services <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV09-3087

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	New York

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____ Date May 1, 2009

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**PE09-019
TOYOTA
RESPONSE 4
LEGAL**

**PE09-019
TOYOTA
RESPONSE 4
LEGAL
FILE # 2008-07-45161**

Case Activity Report

Case # : 200806180300

Case Type : PRIORITY

Owner's Group :

Brand : Toyota

Case/Activity Last Updated :

Case Title : PRODUCT ; RECURRING CONDITION ; HEADLIGHT- EXTERIOR LIGHTS ; INOPERATIVE

CUSTOMER INFORMATION		VEHICLE INFORMATION		CASE INFORMATION	
NAME :	MR.	VIN :	JTDKB20U673277939	STATUS :	Closed
ADDR1 :		MODEL YR. :	2007	SUB-STATUS :	Completed
ADDR2 :		MODEL :	PRIUS	SOURCE :	CUSTOMER
CITY, STATE, ZIP :	NORTH VA	GRADE :	Hybrid	INITIAL CHANNEL :	Call - Inbound
COUNTRY :	USA	MODEL NUMBER :	1224	OWNER :	GETZJ
PRIM. PHONE :		ENGINE :	1NZ	CREATED DATE :	06/18/2008 08:39:35
ALT PHONE :		TRANSMISSION :	CVT-E	CREATED BY :	JGETZ
FAX NUMBER :	--	SELLING DEALER CODE & NAME :	45060 GLOUCESTER TOYOTA	CREATOR'S GROUP :	
EMAIL ADDRESS :		DOFU :	07/28/2007	CLOSED DATE :	07/01/2008 11:12:25
		CURRENT MONTHS :	10	CLOSED BY :	TMSPLoad
		CURRENT MILES :	64000	CLOSER'S GROUP :	
		INCIDENT MILES :	64000		
		CERTIFIED :	No		

DEALER INFORMATION		CLOSING SUMMARY	
PRIMARY DEALER CODE & NAME :	45076 CASEY TOYOTA	CSAT :	
REGION CODE - NAME :	80 - CAT	CLOSE APPROVED BY :	
DISTRICT :	05	CLOSE APPROVED :	
SECONDARY DEALER CODE & NAME :	45060 GLOUCESTER TOYOTA	# OF CLOSE EXTENSIONS :	0
REGION CODE - NAME :	80 - CAT		
DISTRICT :	05		

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	<p>Ilr contacted the Ncr and he advised that he has retained a attorney b/c he feels he has a lemon b/c the headlights had gone out 3x. He advised has an extended svc contract. He called Gloucester Toyota and they advised will not assist him. He contacted Casey and he advised they are not willing to help him. Ncr advised the cllr will contact the svc mgr at Casey</p>	

This information is confidential and proprietary to Toyota ; Please refer to guidelines/policies for restrictions on use.

Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>b/c cllr does not work with Gloucester Toyota. Ncr advised the cllr will contact the dlr and call him back tomorrow 6/20/08.</p> <p>*** NOTES 06/19/2008 12:41:39 PM JGetz ===OUTGOING DLR CALL CASEY TOYOTA==</p> <p>Ncr attempted to contact the svc l/m on v/m gave #310-468-9533.</p> <p>*** PHONE LOG 06/20/2008 11:23:45 AM JGetz Action Type: Outgoing call ==OUTGOING DLR CALL CASEY TOYOTA===</p> <p>Ncr contacted the svc mgr Donna advised she would need the vehicle to be brought in to determine if the ECM needs to be replaced along with the bulb. Ncr advised the cllr will be looking into g/w to cover the cost of the repair. She advised once the vehicle is brought in it should take about 2 days to diag, order parts and fix. She advised he would have to bring the vehicle into the dlr on weekday.</p> <p>*** PHONE LOG 06/20/2008 04:23:14 PM JGetz Action Type: Outgoing call ===OUTGOING CUST CALL 804-695-7070==</p> <p>Ncr contacted the cllr, and advised him the dlr would have to diag the concern to determine what repair needs to be done. Ncr advised the cllr vehicle would have to go to the dlr to determine what the cllr g/w. Cllr began to become very upset and</p>	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	<p>===</p> <p>Ncr contacted the svc mgr Donna and she advised will not cover repair even though the dlr will be reimbursed by Ncr. She advised he will have to deal with Toyota CEC directly b/c the clir had been out of line at the dlr and has threatened the dlr she feels dlr should not assist the clir at all.</p> <p>*** PHONE LOG 06/24/2008 12:22:53 PM JGetz Action Type: Incoming call</p> <p>===INCOMING CUST CALL [REDACTED] ==</p> <p>Clir contacted the Ncr, Ncr advised the clir the dlr will not be willing to cover the amount to reimburse the dlr. He advised cannot front the funds to pay for the repair. He advised wants the Ncr to cover it up front. Ncr advised the clir the only way is if the dlr is willing to cover the repair and they are not willing. Ncr advised the clir will contact the dlr again to see what else can be done. Ncr advised the clir will call him later in the day.</p> <p>*** NOTES 06/24/2008 02:10:59 PM JGetz</p> <p>===OUTGOING DLR CALL CASEY TOYOTA===</p> <p>Ncr contacted the svc mgr Donna and advised will cover cost of the repair and Ncr will reimburse the dlr for the repair.</p> <p>*** NOTES 06/24/2008 03:23:50 PM JGetz</p> <p>===OUTGOING CUST CALL [REDACTED] ===</p> <p>Ncr contacted the clir and advised the clir will reimburse him for a rental if he needs a rental and advised the dlr will cover cost of the repair and the Ncr will reimburse the dlr for the repair. He advised wants</p>	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			to bring the vehicle to the dlr on Thursday. Ncr advised the cllr will contact the dlr tomorrow to let them know. *** NOTES 06/25/2008 0	
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	Toyota to fix and the cover it. Ncr advised the cllr will have to contact the dlr and will have to call him back.	
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	ir and the rental. Ncr received DSPM approval. CUSTOMER SATISFIED: Unknown ROOT CAUSE: Product, Recurring Condition, Headlight-Exterior light, Inoperative. *** SUBCASE 200806180300-1 CLOSED 07/01/2008 11:14:12 AM JGetz *** NOTES 07/10/2008 02:00:11 PM JMoore ===LETTER== Written 7/7/08 - Received 7/10/08 - (attorney Patricia Dickey is writing) sts veh owner has has numerous trouble with the headlights for this veh. Cllr sts it seems like the issue stems from the system of the veh. Cllr sts being this issue is on the headlights this is a definite safety issue. Cllr sts feels veh owner should not have to keep paying to have parts for the headlights replaced. Cllr feels toy should take back this veh. *** NOTES 07/18/2008 06:41:05 AM THarris Cust c/b seeking Nancy Fein's & David Weigand's fax #. NCR advd dept fax # is 310-468-7814. Cllr sks to know when the CMs is scheduled to come in. NCR advd CM is scheduled to come in @ 7:00 am PST. Cllr sts is gathering info for his attorney. Sts sks to have his veh rprd today. Sts not cncrnd about where JGetz is.	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>NCR advd issue would need to be resolved by the CM. NCR advd l/m for 1 b/d c/b. Cllr sts will c/b in 30 minutes. NCR advd will rcv c/b in 1 b/d. Cllr thanked.</p> <p>*** NOTES 07/18/2008 08:11:07 AM DHouston cllr sks case mgr Jane, Ncr warm tranfer cllr to case mgr.</p> <p>*** NOTES 07/18/2008 08:30:27 AM JGetz ==INCOMING CUST CALL [REDACTED]=== Cllr contacted the Ncr and advised his passenger bulb went out again. He advised wants</p>	
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	<p>advised Gloucester Toyota told him his extended warranty covers every thing on the vehicle. Ncr advised the cllr that is not the case and will have look at concern as a g/w. He advised wants ARB paper work to be sent to him b/c this was the third time this happened. He wants us to cover cost of the repair and rental. He advised is going to start a website to let everyone know about how unsafe this vehicle is and wants the people to know Toyota did not make it right. He advised the Case Manager to replace his vehicle by going over and beyond.</p> <p>*** NOTES 06/23/2008 09:46:57 AM JGetz ==OUTGOING DLR CALL CASEY TOYOTA=== Ncr contacted the dlr l/m on with svc advisor. Ncr advised to have svc mgr Donna call Ncr back and gave [REDACTED]</p> <p>*** NOTES 06/23/2008 04:06:23 PM JGetz Ncr sent ARB paper work to the cllr.</p> <p>*** NOTES 06/24/2008 06:23:12 AM MWinston</p>	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>Caller called to speak with CM. NCR apol & adv cust not avail and will request for c/b in 1 b/d. NCR adv case #.</p> <p>*** NOTES 06/24/2008 08:09:30 AM ABarrett</p> <p>Customer called to speak with JGetz. NCR apol and adv that JGetz is unavailable. NCR adv will receive a call back w/ in 1 BD.</p> <p>*** NOTES 06/24/2008 08:11:31 AM JGetz</p> <p>==OUTGOING CUST CALL [REDACTED]</p> <p>Ncr contacted the cell phone l/m on v/m gave # 800-331-4331-73058. Ncr will not call work# due to cllr cannot accept personal calls.</p> <p>*** NOTES 06/24/2008 08:19:07 AM JGetz</p> <p>diregard prev note.</p> <p>*** NOTES 06/24/2008 08:20:28 AM JGetz</p> <p>===OUTGOING DLR CALL CASEY TOYOTA</p>	
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	<p>2:51:33 PM JGetz</p> <p>===OUTGOING CUST CALL [REDACTED]===</p> <p>Ncr contacted the cllr and advised him the dlr will put him into a Rental and Ncr will reimburse the dlr for the repair and the rental. Offer based on customer satisfaction and future retention.</p> <p>*** NOTES 07/01/2008 10:51:00 AM DMorano</p> <p>cllr sts he wanted the TMS address and his case number. cllr sts he had the tcs dept mgr 's names for a possible lemon law action. ncr trans cust to cm.</p> <p>*** PHONE LOG 07/01/2008 11:09:26 AM JGetz Action Type: Incoming call</p>	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>===INCOMING CUST CALL [REDACTED] ==</p> <p>Cllr advised the Ncr his experience with Casey Toyota was horrible. He advised no one at the dlr would talk to him. He advised they put him in a rental and repaired the head lights but he feels his experience was unprofessional and he is going to write a ltr and advise his experience with the dlr and Ncr. He advised no one stepped up to the plate to help him. He wants the Ncr to replace his vehicle. Ncr advised the cllr ARB process. He advised is going to get an attorney and file Lemon Law. Cllr asked for the survey. Ncr advised the cllr will receive the survey in the mail after the Ncr closes the case today.</p> <p>*** CASE CLOSE 07/01/2008 11:13:52 AM JGetz</p> <p>SUMMARY: Cllr sts has had his HID bulbs replaced in his Prius 3x and wants Toyota to cover the cost.</p> <p>ACTION TAKEN: Dlr inspected the vehicle.</p> <p>RESOLUTION/POSITION: Dlr replaced the headlights and put the cllr in a rental. Ncr agreed to reimburse the dlr for the cost of the repa</p>	
03/14/2009 13:47:43 / Case Long Note	Done	GETZJ /	<p>*** PHONE LOG 06/18/2008 08:55:19 AM JAshby</p> <p>Caller states: their headlights keep going out. sts they were under impression they had unlimited bumper to bumper warr. sts dlr adv the headlights are not covered under warr. sts prev had both headlights repaired. sts 1st ime RO#096721 date: 11/09/07. sts 2nd time 967623, date: 12/26/07. sts 3rd time RO#969949 date: 1/08/08. sts head lights are working intermittently again. sts dlr advd this is no longer covered under warr because they outside warr by mileage</p> <p>*** NOTES 06/18/2008 08:55:20 AM JAshby</p> <p>....sts would like to have repairs to headlights covered under warr. ncr apol & adv will doc cust request. Provided case#.ncr adv, will open case to a case manager & adv, case manager will contact cust eob (1) day.</p>	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>*** NOTES 06/19/2008 07:56:52 AM GTravis</p> <p>cust c/b sts that this veh has been nothing but trouble. sts that has had multiple concerns w/ headlights. sts that at this time has contacted his attorney in this regard due to the multiple repairs, sts the lights alone have cost warranty and toyota close to 7000 dollars.</p> <p>*** NOTES 06/19/2008 08:01:52 AM GTravis</p> <p>cust sts that he is going forward to have current headlight repair and his ext warr will cover but still wishes to speak to CM. NCR adv cust that he is expected to receive c/b today. cust thanked.</p> <p>*** SUBCASE 200806180300-1 CREATED 06/19/2008 11:10:33 AM JGetz</p> <p>*** PHONE LOG 06/19/2008 12:39:09 PM JGetz Action Type: Incoming call ==INCOMING CUST CALL 804-695-7070== C</p>	

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Case Activity Report

Case # : 200807140135

Case Type : PRIORITY

Owner's Group :

Brand : Toyota

Case/Activity Last Updated :

Case Title : ARBITRATION REQUEST ; ABNORMAL CONDITION ; HEADLIGHT- EXTERIOR LIGHTS ; OTHER-PLEASE SPECIFY

CUSTOMER INFORMATION		VEHICLE INFORMATION		CASE INFORMATION	
NAME :	MR.	VIN :	JTDKB20U673	STATUS :	Closed
ADDR1 :		MODEL YR. :	2007	SUB-STATUS :	Completed
ADDR2 :		MODEL :	PRIUS	SOURCE :	LEMON LAW
CITY, STATE, ZIP :	NORTH VA	GRADE :	Hybrid	INITIAL CHANNEL :	Letter - Inbound
COUNTRY :	USA	MODEL NUMBER :	1224	OWNER :	SADMIN
PRIM. PHONE :		ENGINE :	1NZ	CREATED DATE :	07/14/2008 06:51:53
ALT PHONE :		TRANSMISSION :	CVT-E	CREATED BY :	VMARIN
FAX NUMBER :	--	SELLING DEALER CODE & NAME :	45060 GLOUCESTER TOYOTA	CREATOR'S GROUP :	
EMAIL ADDRESS :		DOFU :	07/28/2007	CLOSED DATE :	10/27/2008 09:07:14
		CURRENT MONTHS :	11	CLOSED BY :	TMSPLOAD
		CURRENT MILES :	0	CLOSER'S GROUP :	
		INCIDENT MILES :	0		
		CERTIFIED :	No		

DEALER INFORMATION		CLOSING SUMMARY	
PRIMARY DEALER CODE & NAME :	45076 CASEY TOYOTA	CSAT :	
REGION CODE - NAME :	80 - CAT	CLOSE APPROVED BY :	
DISTRICT :	05	CLOSE APPROVED :	
SECONDARY DEALER CODE & NAME :		# OF CLOSE EXTENSIONS :	0
REGION CODE - NAME :	-		
DISTRICT :			

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
03/14/2009 13:47:43 / Case Long Note	Done	SADMIN /	*** PHONE LOG 07/14/2008 06:55:58 AM VMarin ==LEMON LAW== Previous Case#200806180300 (attorney Patricia Dickey is writing) sts veh owner has has numerous trouble with the headlights for this veh. Cllr sts it seems like the issue stems from the system	

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Case Activity Report

ACTIVITIES				
CREATED / TYPE	STATUS	OWNER / JOB TITLE	DESCRIPTION	RESPONSE
			<p>of the veh. Cllr sts being this issue is on the headlights this is a definite safety issue. Cllr sts feels veh owner should not have to keep paying to have parts for the headlights replaced. Cllr feels toy should take back this veh.</p> <p>*** NOTES 07/18/2008 06:15:30 AM EDedrick</p> <p>Cust cld & requested to spk to Jane Getz. NCR adv JGetz is no longer his Case Manager & NCR will notify her cust is trying to contact her but, NCR can't guarantee cust a c/b b/c she is no longer his Case Manager. Cust sts he's calling b/c his lights went out again as of 7/17/08. Cust sts he wants to get his lights fixed. Cust would like to get light fixed today.</p> <p>*** CASE CLOSE 10/27/2008 09:07:19 AM VMarin</p> <p>==CUSTOMER'S LEMON LAW DEMAND HAS BEEN FORWARDED TO THE REGION FOR REVIEW==</p> <p>*** CASE CLOSE 10/27/2008 09:07:19 AM VMarin</p> <p>==CUSTOMER'S LEMON LAW DEMAND HAS BEEN FORWARDED TO THE REGION FOR REVIEW==</p>	

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Central Atlantic Toyota Distributors
a division of Toyota Motor Sales, U.S.A., Inc.
6710 Baymeadow Drive
Glen Burnie, MD 21060
(410) 760-1500

July 31, 2008

Patricia B. Dickey
Attorney at Law
P.O. Box 433
Mathews, VA 23109

Re: Claim of: [REDACTED]
VIN: JTDKB20U673 [REDACTED]
Vehicle model and year: 2007 PRIUS

Dear Ms. Dickey:

Thank you for providing us with the opportunity to evaluate Mr. [REDACTED] Lemon Law concerns. After evaluating this matter, and pursuant to your request, we hereby make the following offer pursuant to Virginia State Lemon Law

Toyota Motor Sales, U.S.A., offers to repurchase the vehicle. If we repurchase the vehicle and the vehicle is not leased, Toyota will:

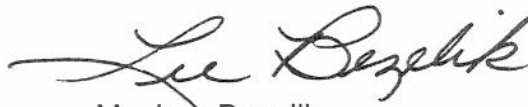
- Refund the amount you paid for your vehicle at the time of purchase as shown on your bill of sale/purchase contract.
- Refund the sales tax you paid unless the state will refund the tax to you.
- Refund the license, title, registration, and documentation fees paid at the time of purchase.
- Refund any finance charges that you have paid on the loan for this vehicle.
- Refund the cost of a Toyota service contract if one was purchased.
- Refund the cost of Toyota accessories you paid extra to have installed on your vehicle at the time of purchase (You will be required to provide receipts to establish the value of the accessories)
- Deduct any cash rebates you received as an incentive to purchase the vehicle.
- Require that you provide a copy of your original purchase contract.
- Require that you provide authorization to your lien holder, when needed, to provide the Manufacturer with lien payoff information.
- Require that you transfer a clear title (lien free) for your vehicle to the Manufacturer at the time you receive your refund.
- Require that the vehicle is damage free at the time you receive your refund.
- Require that all original equipment and any accessory for which you are receiving a refund is on the vehicle at the time you receive your refund and

will also require you to remove all aftermarket accessories and repair any damage caused by the removal.

- Require you to sign a statement to attest to the fact that the vehicle was/was not previously damaged and repaired.
- Less a reasonable allowance for use prior to the 1st report of the non conformity, which is 34,437 @ \$.2525 cents per mile = \$8,695.34; or 10% of the purchase price, whichever is less.

Thank you again for providing us with the opportunity to work toward resolving this matter. I look forward to hearing from you regarding your acceptance of our offer. Please submit your decision to us in writing. We also would like to ask that your return correspondence be in a prompt manner so that the final resolution can be expedited.

Very Truly Yours,

A handwritten signature in black ink, reading "Lee Bezelik". The signature is fluid and cursive, with the first name "Lee" and last name "Bezelik" clearly distinguishable.

Ms. Lee Bezelik
Customer Relations
Supervisor

Patricia B. Dickey

Attorney at Law

P.O. Box 433

Mathews, Virginia 23109

Telephone (804) 725-2599

Facsimile (804) 725-2012

N. Fein

JUL 10 2008

July 7, 2008

Ms. Nancy Fine, Vice President
Customer Relations
Mr. David Weigand, Manager
Toyota Customer Experience
Toyota Motor Sales USA
19001 S. Western Ave., Dept WC11
Torrance CA 90509

In Re: [REDACTED], Case # 200806180300

Dear Ms. Fine and Mr. Weigand:



I represent the above-named individual who purchased a Toyota Prius in 2007 and has had constant problems with the headlights, which he has had to have replaced four times since he purchased the vehicle, and has also had to replace the computer components related to this vehicle. Losing the headlights while driving at night is a considerable safety hazard. Under the "Lemon Law" of the Commonwealth of Virginia, this constitutes a non-conforming vehicle.

Mr. [REDACTED] believes that, as a matter of public safety, this particular vehicle should be recalled and the Consumer Product Safety Commission be notified, as the problem seems to stem from the car's system and not isolated. If you believe otherwise, then Mr. [REDACTED] would demand that you take back the vehicle and completely cancel out his obligation to Toyota Financial or provide him with a new, defect-free car of equal or lesser value, with him being obligated only for the purchase of that.

Mr. [REDACTED] had hoped to drive this car for at least 300,000 miles and cannot justify the cost of having to constantly replace parts relating to lights. He has been in contact with a Ms. Jane Getz at the Toyota Customer Experience Center, which has not been a happy experience for him.

Sincerely,

Patricia B. Dickey

PBD/sd

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Attorney at Law
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Ms. Nancy Fine, Vice President
Customer Relations
Toyota Motor Sales USA
19001 S. Western Ave., Dept WC11
Torrance CA 90509

Patricia B. Dickey

Attorney at Law

P.O. Box 433

Mathews, Virginia 23109

Telephone (804) 725-2599

Facsimile (804) 725-2012

July 21, 2008

Ms. Nancy Fine, Vice-President Customer Relations
Toyota Motor Sales, USA.

VIA FACSIMILE: (310) 468-7814

In Re: [REDACTED] Case #200806180300

Dear Ms. Fine:

I understand that you have forwarded the above-referenced claim to Central Atlantic Toyota Distributors for investigation and resolution, and they have contacted me. However, of more immediate concern is the fact that the headlight on Mr. [REDACTED] Prius went out once again last Thursday evening while he was driving the automobile. He has been told the it will cost approximately \$2,000.00 to replace the bulb and computer component and that Toyota will not be responsible for it. Mr. [REDACTED] cannot afford that kind of money and the car will not pass inspection, which is due this month, thereby rendering it unusable at all.

I will be out of town all of this week, so if someone would please contact Mr. [REDACTED] directly at [REDACTED], it would be greatly appreciated.

Sincerely,


Patricia B. Dickey

PBD

**PE09-019
TOYOTA
RESPONSE 4
LEGAL
FILE # 2007-09-43210**

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Scott Glennon, Esq.*
Parsippany
*Licensed in New Jersey

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August 3, 2007

Toyota Motor Sales, U.S.A., Inc.
Customer Assistance Center
19001 South Western Avenue
Torrance, California 90509-2991

Re: Revocation of Acceptance
Our Client: [REDACTED]
Vehicle: 2006 Toyota Prius
Date of Purch/Lease: March 2006
VIN: JTDKKB20U463 [REDACTED]
Current Mileage: 35,500
Our File No: 071375LL



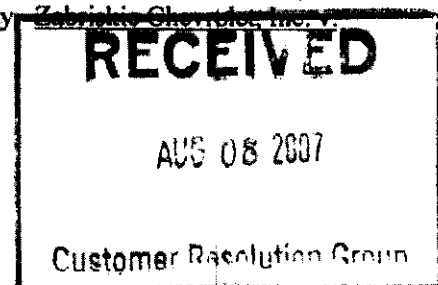
Dear Sir or Madam:

Please be advised that this office has been retained by Mr. [REDACTED] regarding the above-referenced vehicle which was obtained from New Holland Autocare (New Holland, PA). Since that time, our client's vehicle has undergone repeated repair attempts for a number of defects and nonconformities. As a result, our client has been forced to seek full relief pursuant to state and federal consumer product warranty laws.

The vehicle's primary defects and nonconformities include, but are not limited to, the following:

1. Electrical System/Headlights; and
2. Any and all additional complaints actually made, whether contained on company invoices or otherwise.

These nonconformities substantially impair the use, value and safety of the subject vehicle as defined under the Pennsylvania Lemon Law, the Magnuson-Moss Warranty Act and the Pennsylvania Uniform Commercial Code. Because the "purchase of a new car is a major investment [which is] rationalized by the peace of mind that flows from its dependability and safety...", these defects have understandably caused our client to lose all faith and confidence in the vehicle's integrity. *Zabrickis Chevrolet, Inc. v. Smith*, 240 A.2d 195 (N.J. Super. Ct. 1968).



Therefore, you (and the authorized dealer) are hereby notified that Mr. [REDACTED] is revoking acceptance of the vehicle effective immediately. Mr. [REDACTED] has directed us to demand the return of any and all funds paid towards this vehicle, to rescind the contracts, and to seek compensation for any incidental and consequential damages, including attorney's fees. Please inform this office of the procedure whereby our client may return the vehicle and recoup these expenses. DO NOT CONTACT OUR CLIENT UNDER ANY CIRCUMSTANCES AND DIRECT ALL INQUIRIES TO THIS LAW OFFICE.¹

If you wish to resolve this matter expeditiously or merely apprise us of your position, please contact me as soon as possible. Knowing we have to wait up to forty (40) days for an arbitration decision prior to filing with the court, we will be preparing the arbitration application immediately. If we do not hear anything from you and/or we receive an unfavorable decision from the arbitration panel, we have been directed to commence formal legal proceedings against you.²

Sincerely,



Meredith Allie-Gordon
Attorney for [REDACTED]

MAG/pe

cc: [REDACTED]

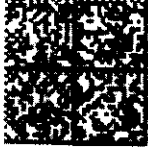
071375LL / BYRNE, R. AND M. V. TOYOTA\T:\team50\template\document\00000157.dot

¹Until this matter is resolved, Mr. [REDACTED] reserves the right to make appointments to have current and future defects repaired by any authorized dealer of the consumer's choice, especially while the vehicle remains under warranty.

² However, if the consumer has already completed the informal arbitration process, we will begin preparing a formal complaint to be filed with the Court in fourteen (14) days.

KAHN & ASSOCIATES, L.L.C.
ATTORNEYS AT LAW

1060 First Avenue, Suite 400, King of Prussia, PA 19406



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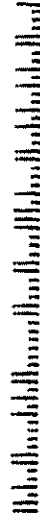
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Customer Resolution Group

Toyota Motor Sales, U.S.A., Inc.
Customer Assistance Center
19001 South Western Avenue
Torrance, California 90509-2991

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Scott Glennon, Esq.*
Parsippany
*Licensed in New Jersey

NORTH CAROLINA OFFICE
Raleigh

PENNSYLVANIA OFFICES
EAST - King of Prussia
WEST - North Versailles

TENNESSEE OFFICE
Nashville

VIRGINIA OFFICE
Richmond

August 16, 2007

VIA FIRST CLASS U.S. MAIL

Ms. Lee Bezelik
Central Atlantic Toyota
6710 Baymeadow Drive
Glen Burnie, MD 21060

Re: [REDACTED] v. Toyota Motor Sales, U.S.A., Inc.
VIN#: JTDKKB20U463 [REDACTED]
2006 Toyota Prius


Dear Ms. Bezelik:

Pursuant to your request dated August 9, 2007, enclosed please find the following with regard to the above-captioned matter:

1. a copy of the vehicle title;
2. a copy of the vehicle registration; and
2. all repair orders.

If you require anything further, please contact me.

Sincerely,


Pamela Erb
Paralegal

Enclosures

CALIFORNIA OFFICES
NORTH - San Anselmo
CENTRAL - Los Angeles
SOUTH - San Diego

CONNECTICUT OFFICE
Hartford

FLORIDA OFFICES
NORTH - Tallahassee
CENTRAL - Tampa
SOUTH - Miami

INDIANA OFFICE
Indianapolis

MARYLAND OFFICE
Baltimore

MASSACHUSETTS OFFICE
Burlington

KAHN & ASSOCIATES

L.L.C.

1-888-LEMONS-1

(1-888-536-6671)

Fax 1-888-868-6671

www.kahnandassociates.com

CORPORATE HEADQUARTERS

55 Public Square, Suite 650

Cleveland, OH 44113

P (216) 621-6101

F (216) 621-6006

PLEASE REMIT ALL CORRESPONDENCE TO CORPORATE HEADQUARTERS

MICHIGAN OFFICE
Northville

MISSOURI OFFICE
St. Louis

NEW JERSEY OFFICE
Scott Glennon, Esq.*
Parsippany
*Licensed in New Jersey

NORTH CAROLINA OFFICE
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TENNESSEE OFFICE
Nashville

VIRGINIA OFFICE
Richmond

August 3, 2007

VIA FIRST CLASS U.S. MAIL

National Center for Dispute Settlement
22500 Metropolitan Parkway, Suite 200
Clinton Township, MI 48035

Re: Request for Arbitration
Our Client: [REDACTED]
Vehicle: 2006 Toyota Prius
Date of Purch/Lease: March 2006
VIN: JTDKB20U463 [REDACTED]
Place of Purchase: New Holland Autocare; New Holland, PA

Dear Sir/Madam:

Please be advised that this office has been retained by Mr. [REDACTED] regarding the above-referenced vehicle which was obtained from New Holland Autocare (New Holland, PA). Since that time, our client's vehicle has undergone repeated repair attempts for a number of defects and nonconformities. As a result, our client has been forced to seek full relief pursuant to state and federal consumer product warranty laws.

Pursuant to the Pennsylvania Lemon Law, this letter is being sent as a formal request for arbitration. Toyota Motor Sales, USA, Inc. has designated the National Center for Dispute Settlement as the entity to which this request should be addressed.

The vehicle's primary defects and nonconformities include, but are not limited to, the following:

1. Electrical System/Headlights; and
2. Any and all additional complaints actually made, whether contained on company invoices or otherwise.

The supporting documents regarding this claim are enclosed and listed below. These include:

1. Application Form;

2. All Repair/Warranty Invoices in consumer's possession;
3. Dealer Purchase/Lease Agreement; and/or
4. Bank Finance/Lease Agreement; and/or
5. Pennsylvania Registration



All recall items affecting this vehicle, any and all service bulletins pertaining to same, as well as the contents of all invoices, are incorporated as complaints herein by reference.

These nonconformities substantially impair the use, value and safety of the subject vehicle as defined under the Pennsylvania Lemon Law, the Magnuson-Moss Warranty Act and the Pennsylvania Uniform Commercial Code. Pursuant to those laws, **our client is entitled to the choice of either a replacement vehicle or a full refund and incidental damages, collateral charges and attorney's fees.**

DO NOT CONTACT OUR CLIENT UNDER ANY CIRCUMSTANCES AND DIRECT ALL INQUIRIES AND CORRESPONDENCE TO THIS LAW OFFICE. If an inspection is requested, please contact this office to arrange for same.

Sincerely,

KAHN & ASSOCIATES, L.L.C.


Meredith Allie-Gordon
Attorney for 

MAG/pe
Enclosures

cc: 

071375LL / BYRNE, R. AND M. V. TOYOTA\\team50\template\document\00000140.dot



08/06/2007

National Center for Dispute Settlement
22500 Metropolitan Parkway - Suite 200
Clinton Township, MI 48035
(800) 936-4303
(586) 741-0870
Fax: (586) 790-4774

Toyota Motor Sales, U.S.A., Inc.
Central Atlantic Toyota Distributors, Inc.
6710 Baymeadow Drive
Glen Burnie, MD 21060

RE: CASE # 8007146

Dear Manufacturer:

Please complete a Manufacturer's Response Form and forward a copy to the National Center for Dispute Settlement within ten (10) days from the date on this letter in order for it to be considered during the decision making process.

Enclosed are the "Rules and Procedures for the Informal Resolution of Automobile Warranty Disputes." Please review them carefully so that you are familiar with the process.

It is essential to the decision making process that all available information concerning each case be provided to the decision maker prior to the hearing date. As with any hearing, lack of participation by a concerned party deprives the process of information on which a reasoned decision can be made.

Thank you for your participation in the process.

Sincerely,

NCDS


Allisia Powell x.118
Case Administrator

cc: 

Where interests converge, agreements emerge



August 6, 2007

Meredith Allie-Gordon, Esq.
Kahn and Assoc., L.L.C.
55 Public Square, #650
Cleveland, OH 44113

National Center for Dispute Settlement
22500 Metropolitan Parkway · Suite 200
Clinton Township, MI 48035
(800) 936-4303
(586) 741-0870
Fax: (586) 790-4774

RE: CASE # 8007146

Customer Name: [REDACTED]

Dear Meredith Allie-Gordon, Esq.:

Your client's request for arbitration has been received. The claim appears to meet the Toyota Dispute Settlement Program parameters for eligibility and has been assigned the case number shown above.

Enclosed are the "Rules and Procedures for the Informal Resolution of Automobile Warranty Disputes." Please review them carefully so that you are familiar with the process.

Your client has the option of having an oral hearing or a "document only" process. If he chooses to make an oral presentation and do not appear at the scheduled hearing, Toyota will still be entitled to make their presentation. If you do not want to make an oral presentation, the dispute will be decided on the basis of the documents submitted by all parties. Your client does not need to be present at a "document only" decision process. You will receive a call from NCDS to determine which process your client has selected.

You may also be contacted by NCDS prior to the hearing date in an effort to help your client and Toyota reach a voluntary agreement to resolve the dispute. If your client agrees to a mediated settlement, the terms of the agreement will be put in writing and your client will be asked to sign the Settlement Agreement. The case will then be closed.

If your client does not agree to a settlement offer, the dispute will be decided at the scheduled oral hearing or document review. You will receive a written decision by the Arbitrator(s) within ten (10) days after the oral hearing or document review. Your client may either accept or reject the decision. If your client accepts the decision, Toyota will comply with the decision within the time stipulated. If your client rejects the decision, the case will be closed and you may pursue any other legal remedies available to you.

If your client has not done so already, please provide us with copies of all relevant service tickets, as well as a copy of the vehicle title, current registration and bill of sale or lease contract. Your client's participation in the Dispute Settlement Program does not relieve him of any obligation he may have with a lender or leasing agent.

NCDS will be responsible for monitoring the progress of this case and is available to answer any questions you may have about the arbitration process. You may call NCDS, toll free at 888-300-NCDS (6237).

Sincerely,

NCDS


Allisia Powell x.118
Case Administrator

cc: Central Atlantic Toyota Distributors, Inc.

Where interests converge, agreements emerge



Central Atlantic Toyota Distributors
a division of Toyota Motor Sales, U.S.A., Inc.
6710 Baymeadow Drive
Glen Burnie, MD 21060
(410) 760-1500

August 9, 2007

Ms. Meredith Allie-Gordon
Kahn & Associates, L.L.C.
Attorneys at Law
55 Public Square, Suite 650
Cleveland, OH 44113

Re: Claim of: [REDACTED]
VIN: JTDKB20U463 [REDACTED]
Vehicle model and year: 2006 PRIUS

Dear Ms. Allie-Gordon:

Toyota Motor Sales, U.S.A., Inc. ("TMS") is in receipt of your correspondence dated August 3, 2007, wherein you are seeking relief under Pennsylvania's Lemon Law on behalf of [REDACTED]. This letter has been forwarded to me at Central Atlantic Toyota to ensure efficient handling and a prompt response.

We understand that you seek Lemon Law relief based on following mechanical concerns:

1. Electrical System/Headlights; and
2. And any and all additional complaints actually made, whether contained on company invoices or otherwise.

If this is not an accurate description of your concerns, please contact us immediately.

We will need to review the following information which you or your client may have in your possession:

1. Legible copies of any and all documents relating to the purchase or lease of the subject vehicle;
2. Legible copies of any and all documents relating to any prior debts which were rolled into the purchase price or lease terms of this vehicle;
3. Legible copies of any and all documents relating to the purchase and installation of any after-market equipment added to the vehicle on or after the date of purchase;

4. Legible copies of any and all maintenance records for the subject vehicle, including non-Toyota repair facilities; and,
5. Legible copies of any and all documents relating to any accidents involving the vehicle.
6. Copies of current registration and/or title.

Please send this information to the following address:

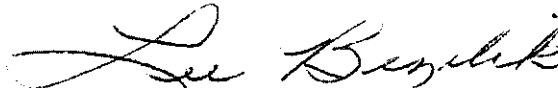
Central Atlantic Toyota
6710 Baymeadow Drive
Glen Burnie, MD 21060
ATTN: Customer Relations Department

In the meantime, we will compile our records on this matter.

Because Toyota values retaining your client as a customer, we would like to inform you that the National Center for Dispute Settlement (NCDS) arbitration services are available to your client. This program is part of Toyota's commitment to provide its customers with an impartial non-affiliated organization to promptly and equitably resolve their concerns. To obtain more information about this process please contact the Toyota National Customer Assistance Center at 1-800-331-4331, Monday through Friday, 6:00 a.m. to 6:00 p.m., Pacific time.

We appreciate the opportunity to lend our assistance. Please be assured that we will be contacting you shortly with hopes of amicably resolving this matter.

Very Truly Yours,



Ms. Lee Bezelik
Customer Relations
Supervisor



National Center for Dispute Settlement

September 5, 2007

22500 Metropolitan Parkway • Suite 200

Clinton Township, MI 48035

(800) 936-4303

(586) 741-0870

Fax: (586) 790-4774

Meredith Allie-Gordon, Esq.
Kahn and Assoc., L.L.C.
Cleveland, OH 44113

Toyota Motor Sales, U.S.A., Inc.
Central Atlantic Toyota Distributors, Inc.
6710 Baymeadow Drive
Glen Burnie, MD 21060

RE: CASE # 8007146
Customer Name: [REDACTED]

Dear Parties:

By direction of the Arbitrator(s), we are enclosing the Decision in the above referenced case.

Enclosed for the vehicle owner is an "Acceptance of Decision" form. The vehicle owner has twenty (20) days from the date of this letter in which NCDS must receive the "Acceptance of Decision" form. The form should be mailed to:

**National Center for Dispute Settlement
22500 Metropolitan Parkway
Suite 200
Clinton Township, MI 48035**

Thank you for your cooperation in resolving this matter through the Expedited Dispute Settlement mechanism. Should you have any questions regarding the Acceptance of Decision, please contact NCDS. Failure to return this form within twenty (20) days from the date of this letter will be considered a rejection of the Arbitrator's Decision and therefore, NCDS will close your case.

Finally, you may obtain, at a reasonable cost, copies of all the case records related to this dispute.

Sincerely,

NCDS

Allisia Powell x.118
Case Administrator

Enclosures: as noted
cc: Board Members

Where interests converge, agreements emerge



National Center for Dispute Settlement

22500 Metropolitan Parkway • Suite 200

Clinton Township, MI 48035

(800) 936-4303

(586) 741-0870

Fax: (586) 790-4774

DATE: September 5, 2007

CUSTOMER: [REDACTED]

CASE #: 8007146

I understand that I am not bound to the Decision of the Arbitrator(s) in my case unless I accept it. If I reject the decision, or am dissatisfied with Toyota's eventual performance, I may pursue other legal remedies, including the use of small claims court. Whether or not I accept the Decision, however, the Decision is admissible in any subsequent legal proceeding concerning the dispute.

I also understand that if I accept the Decision, Toyota will be legally bound by the Decision.

You must mark one of the boxes below, otherwise, NCDS will consider that no response has been made to the Decision and your case will be closed accordingly.

I ACCEPT THE DECISION

()

I DO NOT ACCEPT THE DECISION

()

SIGNED: _____

DATE: _____

NATIONAL CENTER FOR DISPUTE SETTLEMENT

In the matter of the
Arbitration Between

[REDACTED]
("Customer(s)")

and

Toyota Motor Sales, U.S.A.,
Inc.
("Toyota")

DECISION

Case # 8007146

A Three-Person Board, consisting of Ed Hester, Susan C. Lucas and Richard Bee was appointed pursuant to NCDS rules as Arbitrators to determine disputes, which had arisen between the Customer(s), [REDACTED] and Toyota regarding a 2006 Prius.

By a letter dated August 6, 2007, the Board advised the parties that a hearing based solely on documents would be conducted on September 4, 2007.

The complaint(s) existing between the parties were set forth on a "Customer Claim Form" received by NCDS on August 6, 2007, and may be summarized as follows:

The Attorney for the Customer states that there is moisture inside of the vehicle and there is a problem with the electrical system for the headlights.

SUMMARY OF PRESENTATION:

According to the Customer Claim Form received by NCDS on August 6, 2007, the Customer purchased a 2006 Toyota Prius. The vehicle currently has over 35,500 miles on the odometer.

In addition to the Customer Claim Form, the Customer submitted a copy of Repair Order numbers: TOCS435369, TOCS438573, and TOCS439508; a copy of the vehicle Registration; and a typed letter from the Customer's Attorney.

According to the Customer Claim Form, the vehicle has had problems with moisture inside of the vehicle and with the electrical system for the headlights. According to the Customer Claim Form, the problems continue to exist. The Customer has request a replacement or repurchase of the vehicle plus all collateral charges, incidental expenses, and Attorney's fees.

Toyota submitted a Manufacturer Response Form, which stated that Toyota is not clear on the Customer's request. The Customer Claim Form was not properly completed. However, Toyota's position is that we are more than willing to have a Field Technical Specialist inspect the vehicle to determine any current concerns that need to be addressed. Toyota does not feel a repurchase or replacement should be awarded. The vehicle is beyond the criteria necessary for the Lemon Law in the state of Pennsylvania. It has not been subject to an unreasonable number of repairs. Reviewing the mileage on this vehicle, it has not interfered with the operation of the vehicle over the time the Customer has owned it.

DECISION:

After reviewing the complaint(s) and hearing the proofs and arguments of the parties and taking into consideration the applicable manufacturer's new vehicle warranty, and the applicable warranty law including the applicable State Statute commonly referred to as the "Lemon Law," and after due deliberation, we find and Award as follows:

The Customer's request for a replacement or repurchase of the vehicle is hereby DENIED.

We have reached this conclusion because although the vehicle has been repaired for the conditions which impair the use of the vehicle, there has not been an unreasonable number of repair attempts for the same nonconformity.

Attorney's fees, collateral charges, and incidental expenses are beyond the scope of this process.

This constitutes the panels complete DECISION as to all the complaint(s) submitted to the panel for determination.

9-4-07
DATE

Ed Hester
Ed Hester

9-4-07
DATE

Susan C. Lucas
Susan C. Lucas

9-4-07
DATE

Richard Bee
Richard Bee

Case Report - 200708081127**Customer/Caller Summary:**

Customer Name/Address:

East Earl, PA

Caller Phone:

Caller Alt. Phone:

Case Summary:

Case Title: Product; Abnormal Condition; Headlight- Exterior Lights; Other-Please Specify
Case Type: Priority
Contact Method: Written
Cust Attitude: To Pursue Legal Acti
Coding Type: Complaint
Category: Product
Problem Area: Abnormal Condition
Component: Headlight- Exterior Lights
Condition: Other-Please Specify
VIN: JTDKB20U463
Dofu: 03/13/2006
Current Miles: 0
Incident Miles: 0
Model Year: 2006
Model Name: Prius
Region: CAT
District: F
Dealer 1: New Holland Toyota, 37143
Selling Dealer: Faulkner Toyota, 37125

Case History:

Caller Seeks: Repurchase
CAC Stated: Region to follow up with Atty.

*** PHONE LOG 08/08/2007 01:23:01 PM KCravin
==LEMON LAW== Ltr. rec'd from Atty. Meridith Allie-Gordon (Kahn & Associates). Atty. sts. cust. seeks to pursue Lemon Law demand due to issues with the veh. electrical system/headlights. Atty. sts. the veh. has undergone repeated repair attempts. Atty. sts. cust. is seeking a repurchase. Atty. instructs DO NOT CONTACT CUSTOMER.

*** NOTES 08/08/2007 01:24:11 PM KCravin
Attorney Information:
Kahn & Associates
1060 First Avenue, Suite 400
King of Prussia PA 19406
1-888-536-6671 Phone
1-888-868-6671 Fax
www.kahnanassociates.com

Activity Summary:

Activity	Date/Time	Originator	Additional Information
Dispatch	08/08/2007 01:24:23 PM	KCravin	Action Region to CAT
Chg Status	08/08/2007 01:24:23 PM	KCravin	Case sent to region: CAT
Notes	08/08/2007 01:24:11 PM	KCravin	Log notes.
Phone Log	08/08/2007 01:23:01 PM	KCravin	Start = 08/08/2007 01:08:46 PM, End = 08/08/2007 01:23:01 PM, Contact = Ronald Byrne.
Create	08/08/2007 01:08:46 PM	KCravin	Contact = Priority = Lemon Law, Status = Action CAC.

CUSTOMER CLAIM FORM

RECEIVED

AUG 06 2007

FOR NCDS USE

CASE NUMBER
8007146

CUSTOMER NAME AND ADDRESS

☒ Mr. First Name

☐ Mrs.

☐ Ms.

Street Address

City: East Earl

State: PA

Zip Code:

Day Phone

Evening Phone: ()

FAX:

VEHICLE INFORMATION

Name(s) that appears on vehicle title:

If vehicle is used for business:

What percentage of time is vehicle used for business purposes? %

How many other vehicles are owned or leased by the business?

Make: 2006

Model: Toyota Prius

Year: 4

Current Mileage: 35,500

Vehicle Identification Number:

J T D K B 2 0 U H 6 3

Selling Dealer and Address:

New Holland Autocare, 25 Brubaker Ave, New Holland PA 17557

Dominant Servicing Dealer:

same

IF VEHICLE WAS PURCHASED, COMPLETE THE FOLLOWING

Purchase Date: 3/06

Mileage at Purchase:

Purchased as (check): ☒ New ☐ Used ☐ Demo ☐ Fleet

Are your loan payments current? ☒ Yes ☐ No paid in full

Is the vehicle in your possession? ☒ Yes ☐ No

Lienholder's Name and Address:

Account Number:

Lienholder's Phone Number: ()

IF VEHICLE WAS LEASED, COMPLETE THE FOLLOWING

Lease Date:

Mileage at Lease:

Purchased as (check): ☐ New ☐ Used ☐ Demo ☐ Fleet

Are your lease payments current? ☐ Yes ☐ No

Is the vehicle in your possession? ☐ Yes ☐ No

Leasing Company's Name and Address:

Account Number:

Leasing Company's Phone Number: ()

VEHICLE PROBLEMS

Indicate problem.

List dealer(s) that have repaired or attempted repair (include city and state).

List date, mileage and repair order number for each repair attempt.

Does the problem currently exist? (circle)

Example:
A/C won't cool properly

Autoworks, Inc.
Anytown, VA

4/23/03

3,500 miles

#873540

(Yes)

No

Moisture Inside

5/10/07

31,060

Yes

No

Electrical / Headlight

6/7/07

34,171

Yes

No

Electrical / Headlight

6/14/07

35,277

Yes

No

Has the vehicle been involved in an accident? ☐ Yes ☒ No

If yes, date of accident:

Area of vehicle damaged:

Resolution sought: ☐ Repurchase

☐ Replacement

☐ Repair

☐ Reimbursement

Consumer's choice or replacement vehicle or full refund plus all collateral charges, incidental expenses and attorney's fees.

Additional Comment:

Signature(s):

Paralegal for

Date: 8/3/07

Return all copies of this form to:
National Center for Dispute Settlement
22500 Metropolitan Pkwy, Ste. 200
Clinton Township, MI 48835
Phone: (586) 741-8870
Fax: (586) 790-4774

PE09-019
TOYOTA
RESPONSE 4
Property Damage

Case Report - 200610030303**Customer/Caller Summary:**

Customer Name/Address:

Poughkeepsie, NY

Caller Phone:

Caller Alt. Phone:

Case Summary:

Case Title:	Product; FCRP; Headlight- Exterior Lights; Inoperative
Case Type:	Accident
Contact Method:	Phone
Cust Attitude:	Concerned
Coding Type:	Complaint
Category:	Product
Problem Area:	FCRP
Component:	Headlight- Exterior Lights
Condition:	Inoperative
VIN:	JTDKB22U167536776
Dofu:	09/15/2006
Current Miles:	600
Incident Miles:	600
Model Year:	2006
Model Name:	Prius
Region:	New York
District:	06
Dealer 1:	Dch Wappingers Falls Toy., 31158
Selling Dealer:	Dch Wappingers Falls Toy., 31158

Case History:

Caller Seeks: to have issues repaired; and for TMS to cover the rpr costs and rental costs.
CAC Stated: ncr adv of the region open and c/b in 3 bus days. ncr adv of the 30-day inspection timeframe and 30-day response timeframe.

*** PHONE LOG 10/03/2006 08:29:41 AM DHoffman1

Caller states: 06 prius, on 10/02/06 wife drove on a dark hwy, headlights went out. she hit a guardrail. she wore seat belt, driving alone, not sure of speed. police arrived, report #621120, no ambulance, no injuries, no air bag deployment. property damage to l/f fender, & bumper, headlights scratched. no rpr has begun, veh is @ his home. personal ins is graphics arts mutual. he called dlr who was very cooperative, adv bring in veh for inspection....

*** NOTES 10/03/2006 08:32:04 AM DHoffman1

..1 week ago hewas filling veh w/gas, then veh would not start. warning lights came on, he shut veh off, tried to start again, veh would not go into ready mode, or shift. he got out locked & unlocked veh, everything then worked. ncr adv please have all info: police, ins, med, for c/b from case mgr within 2 bus days. caller needs rental, ncr adv case mgr will discuss, no promises, transferred to dlr.

*** SUBCASE 200610030303-1 CREATED 10/04/2006 02:22:39 PM RAbola

*** PHONE LOG 10/05/2006 11:48:00 AM RAbola Action Type: Outgoing call

OUTGOING CUST CALL

ncr spoke w/ cust. cust sts that his wife was involved in the accident. sts that they are currently driving veh. sts veh has not been repaired. sts that last night, while at a restaurant, he was told by a waitress that his headlights were still illuminated. ncr asked cust if ncr can speak w/ wife regarding the accident. cust then handed phone over to wife.

cust's wife sts that she was traveling south on Route 9 and was traveling on the on-ramp to State Hwy 113. sts while traveling on this transitiong, at about 30-35mph, her headlights went out. sts she could not see ahead of her as it was completely dark. sts she knew that she needed to get off road so she went left and ended up hitting the divider. sts as soon as she got the chance, she pulled to the side of the road. sts there were no other vehicles involved. cust's wife then handed phone to cust.

cust sts that he fls TMS should repair vehicle permanently for the concern they've been experiencing. sts the first time they had concerns was when the veh would not start. sts the second time, the headlights turned off automatically. sts third, the headlights turned on automatically. sts they would like concerns repaired and would also like TMS to rpr the headlight, bumper and front fender as the failure of the

headlights caused the accident. last, sts that they would like for TMS to reimburse them for a rental if they need to rent a vehicle.

ncr apol and adv of the region open and c/b in 3 bus days. ncr adv of the 30day inspection timeframe and 30day response timeframe. sts veh has not been touched. sts they are awaiting to hear back from their insurance agency regarding what next steps they would like to take. ncr understood.

*** SUBCASE 200610030303-1 CLOSED 10/05/2006 11:48:52 AM RAbola
ncr closing subcase.

*** NOTES 10/05/2006 11:49:16 AM RAbola

===FCRP===

CLAIMS REQUESTS FIELD CONTACT REPORT W/ MANY INTERIOR AND EXTERIOR PHOTOS

*** NOTES 10/05/2006 01:03:15 PM KWilliams160

Case assigned to FTS Tom Kretchmann and cc: DSPM Matt Capps, CRS Hanna Diver.

*** NOTES 10/12/2006 06:34:59 AM RAbola

INCOMING CUST CALL

cust c/b advising that he has not yet rcvd a c/b from the regional office. further, sts that dlr was instructed by the regional office not to touch veh. sts he would like to have this in writing. ncr apol and adv cust that ncr cannot provide letter stating this. ncr adv cust that ncr will contact region and will request c/b. cust thanked and adv that he was dissatisfied. ncr apol to cust delay. cust thanked.

*** NOTES 10/12/2006 07:06:47 AM RAbola

OUTGOING REG E-MAIL

ncr sent e-mail to the cr analyst (KWilliams) requesting update on case. ncr also adv in e-mail that cust requesting c/b.

*** NOTES 10/13/2006 02:12:03 PM KWilliams160

FTS sts veh is being inspected today (10/13) at Wappingers Falls Toy and will add notes after inspection.

*** NOTES 11/21/2006 08:22:57 AM RAbola

INCOMING CUST CALL

ncr rcvd a c/b from the cust advising that he has not rcvd a response regarding the FTS (TKretchmann) inspection that occurred on 10/13/06. sts that they inspected the headlamps and found all working at this time. sts the veh electrical system was working at this time and that veh in correct working condition. sts he would like to know what TMS' response. ncr apol and adv will research and will c/b cust tomorrow. cust thanked.

*** NOTES 11/21/2006 08:33:36 AM RAbola

OUTGOING REG E-MAIL

ncr sent an e-mail to the cr specialist (HDiver) requesting update.

*** NOTES 11/27/2006 01:45:47 PM RAbola

INCOMING REG E-MAIL

ncr notes, cr specialist HDiver requested that the fts TKretchmann provide response today.

*** NOTES 11/28/2006 12:25:50 PM RAbola

INCOMING CUST CALL

ncr rcvd a c/b from cust requesting an address where he can dispute the decision. ncr understood and provided the following address:

Toyota Motor Sales, Claims Department, 19001 South Western Ave, A-108, Torrance, CA 90509.

*** CASE CLOSE 11/29/2006 05:44:40 AM HDiver160

FTS T Kretschmann inspected vehicle on 10/13/2006. What information was communicated to the customer? No defects could be found at the time of inspection. The vehicle operated as designed. Cs seeks response from Legal dept. Case sent to A108 for response to cs.□

Activity Summary:

Activity	Date/Time	Originator	Additional Information
Rule Action	11/29/2006 05:44:46 AM	rulemgr	Action Notify Originator for Closed Case of rule
Case Close	11/29/2006 05:44:40 AM	HDiver160	Toyota Priority/Accident Closed Case fired Status = Closed, Resolution Code = Full, State = Open.
Notes	11/28/2006 12:25:50 PM	RAbola	Log notes.
Notes	11/27/2006 01:45:47 PM	RAbola	Log notes.
Notes	11/21/2006 08:33:36 AM	RAbola	Log notes.
Notes	11/21/2006 08:22:57 AM	RAbola	Log notes.

Carole
Hargrave/TMS/Toyota
12/06/2006 12:28 PM

To
cc
bcc
Subject

Clarify - ClearSupport

File Edit View Desktop New Select Actions Apps Window Help

Toyota/Scan [READ] Case 200610030303

Contact Name (F/L): Mr [REDACTED]
State/Zip: NY [REDACTED] VIN: JTDEB22U167 [REDACTED]
Day Phone: [REDACTED] Model: Prius Year: 200
Alt Phone: [REDACTED] Comment: Case Manager: RAbola
Alt Contact: [REDACTED] Comment: Warm Transfer x66189

Case Previous Address Dealer Vehicle Coding Status Pubs Reimb Legal Arbitration

Incident Date: 10/02/2006 09:40:00 PM Legal Case#: [REDACTED]
Accident Location: Entrance Ramp from Route 9 (Southbound) to Route 113 (Eastbound)
Customer wearing seatbelt
Road Condition: Clear and Dry
Injuries: None
MD/Hospital: None
Fire/Police: Town of Poughkeepsie Police Department, Report # 621120; No Fire Department
Insurance Info: Graphic Arts Mutual, Division of Utica
Rowledge Agency, (518)374-3453
Claim: None yet
Vehicle Location: Customer's Home, 50 Pasture Lane, Poughkeepsie, NY 12603
☐ Drivable ☐ Repaired ☐ Send As Rag Product

Ready Case 200610030303

Folder: My PaperPort Documents (8 items). Item: Scan6753, December 06, 2006.max (PaperPort Document).

Start Calend... Clarify... Carole... NEW A... NEW A... TeamG... Diary... Paper... My D

TOYOTA

Writer's Direct Dial: (310) 468-5027
Writer's Direct Fax: (310) 381-8317

Toyota Motor Sales, U.S.A., Inc.
19001 South Western Avenue
Torrance, CA 90501

March 19, 2007

VIA US MAIL

[REDACTED]
Poughkeepsie, NY [REDACTED]

RE: **Date of Loss: October 2, 2006**
 Vehicle: 2006 Toyota Prius
 VIN #: JTDKB22U167 [REDACTED]

Dear Mr. [REDACTED]

In response to your letter of December 11, 2006 we are sorry you do not agree with our findings however based on our inspection of the vehicle as outlined in my letter of December 6, 2006 it is our decision that this incident was not the result of any type of manufacturing defect.

Based on our inspection we must respectfully deny your claim.

Very truly yours,



Carole A. Hargrave
Claims Manager
Toyota Motor Sales, U.S.A., Inc.

TOYOTA

Writer's Direct Dial: (310) 468-5027
Writer's Direct Fax: (310) 381-6317

Toyota Motor Sales, U.S.A., Inc.
19001 South Western Avenue
Torrance, CA 90501
(310) 468-4000

December 6, 2006

VIA US MAIL

[REDACTED]
Poughkeepsie, NY [REDACTED]

RE: **Date of Loss: October 2, 2006**
 Vehicle: 2006 Toyota Prius
 VIN #: JTDEB22U167[REDACTED]

Dear Mr. and Mrs. [REDACTED]

This letter is in response to your recent communication with our Customer Relations Department in regards to the above referenced incident.

It is our understanding that Ms. [REDACTED] was operating the vehicle and exiting the highway when the headlights went out causing her to strike the center divider.

Your vehicle was inspected by one of our field technicians on October 13, 2006 at Wappingers Falls Toyota in regards to your report and concerns. The headlights were cycled on and off many time, related wiring and connectors were checked for proper connection and for proper ground point installation. The headlight relay was also inspected for proper seating and for any damage. The headlights operated as designed and within factory specifications with no faults present at the time of our inspection.

We are very sorry about this most unfortunate incident however based on our inspection of your vehicle it was not the result of any type of manufacturing defect. Thank you for allowing us to address your concerns in this matter.

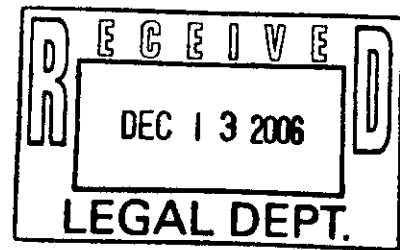
Very truly yours,



Carole A. Hargrave
Claims Manager
Toyota Motor Sales, U.S.A., Inc.

[REDACTED]
Poughkeepsie, NY [REDACTED]

December 11, 2006



Toyota Motor Sales
Claims Department
19001 South Western Ave. A-108
Torrance, CA 90509

Reference: Case # 200610030303

Dear Sirs:

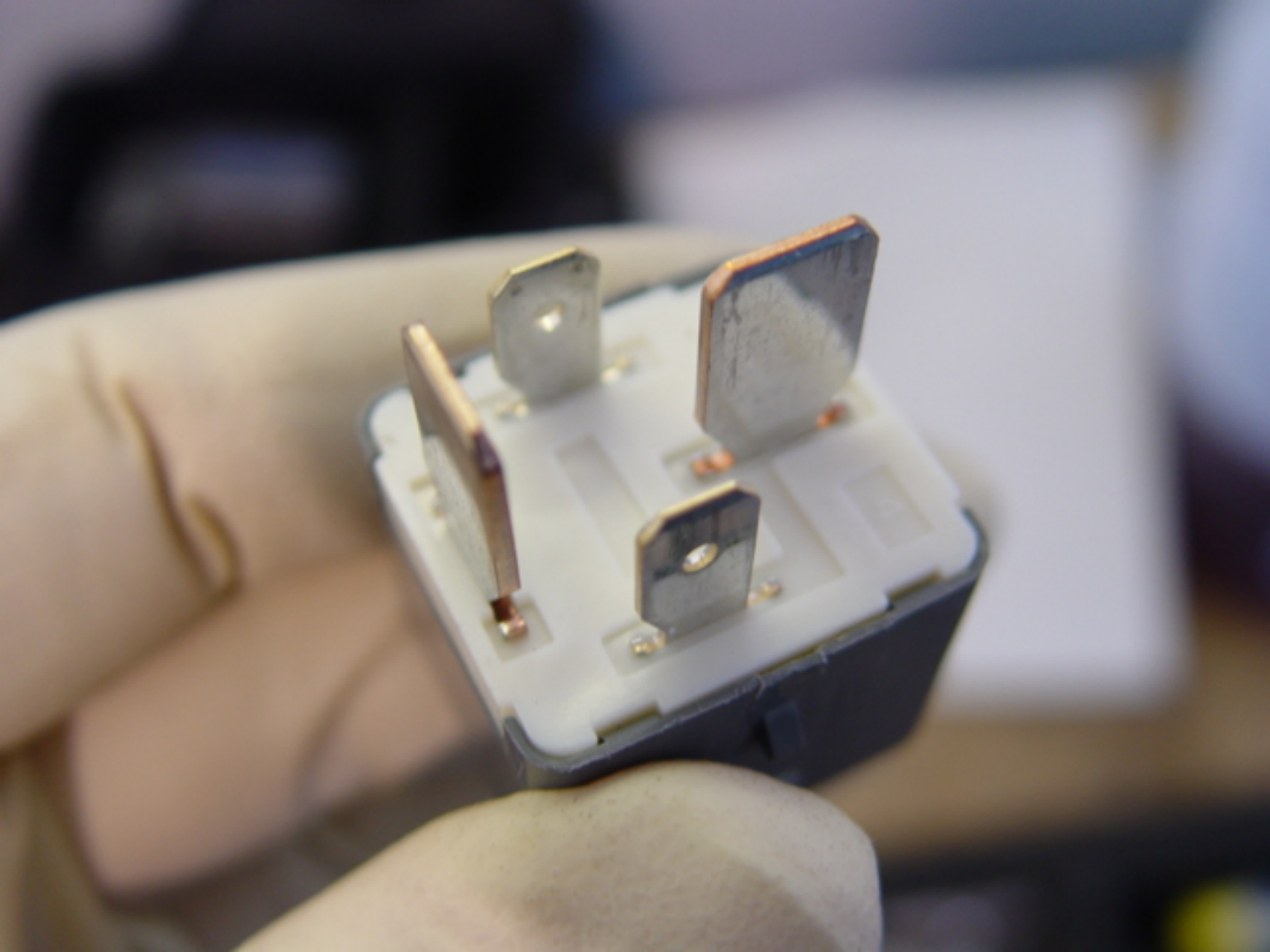
By this letter, I am formally requesting that Toyota compensate me in the amount of \$2101.04 for repair of the damage incurred when the headlights of my new 2006 Toyota Prius malfunctioned on October 2, 2006. I personally paid for the repairs. I have not submitted a formal claim to my insurance carrier, as I consider Toyota to be responsible for the damage that occurred as a result of the headlight failure on this virtually brand-new automobile. Detailed information regarding the malfunction and the resulting accident has previously been provided to various Toyota representatives, by phone, letter, and in person. A brief summary follows.

On October 2, 2006, the headlights went out while the car was being driven normally, at night. My wife brought the car to a safe stop off to the side of the road, but the car incurred some body damage from a guardrail that she could not see due to the loss of illumination. Toyota was notified the day after the accident. Two days later, the car's lights were found to be on about an hour after it had been parked. Either the automatic "off" had malfunctioned when I parked it, or the lights went on after I parked it. (Additionally, there had been a previous incident involving the car's startup sequence, which did not seem to function correctly. This may have been a related malfunction.)

A Toyota representative inspected the car on October 13, and found the headlights to be seemingly in working order at that time. He told me that he was not able to duplicate the failure, and that the lights were working properly when he inspected it. He did not dispute the fact that the lights had gone out as reported.

The headlight malfunction appears to have been due to some sort of intermittent contact or computer "glitch" that has not recurred and was not found in the inspection. It did occur on October 2nd, however, and caused the accident. I hereby submit my claim for \$2101.04 to cover the cost of repair of the damage.

Yours truly,
[REDACTED]



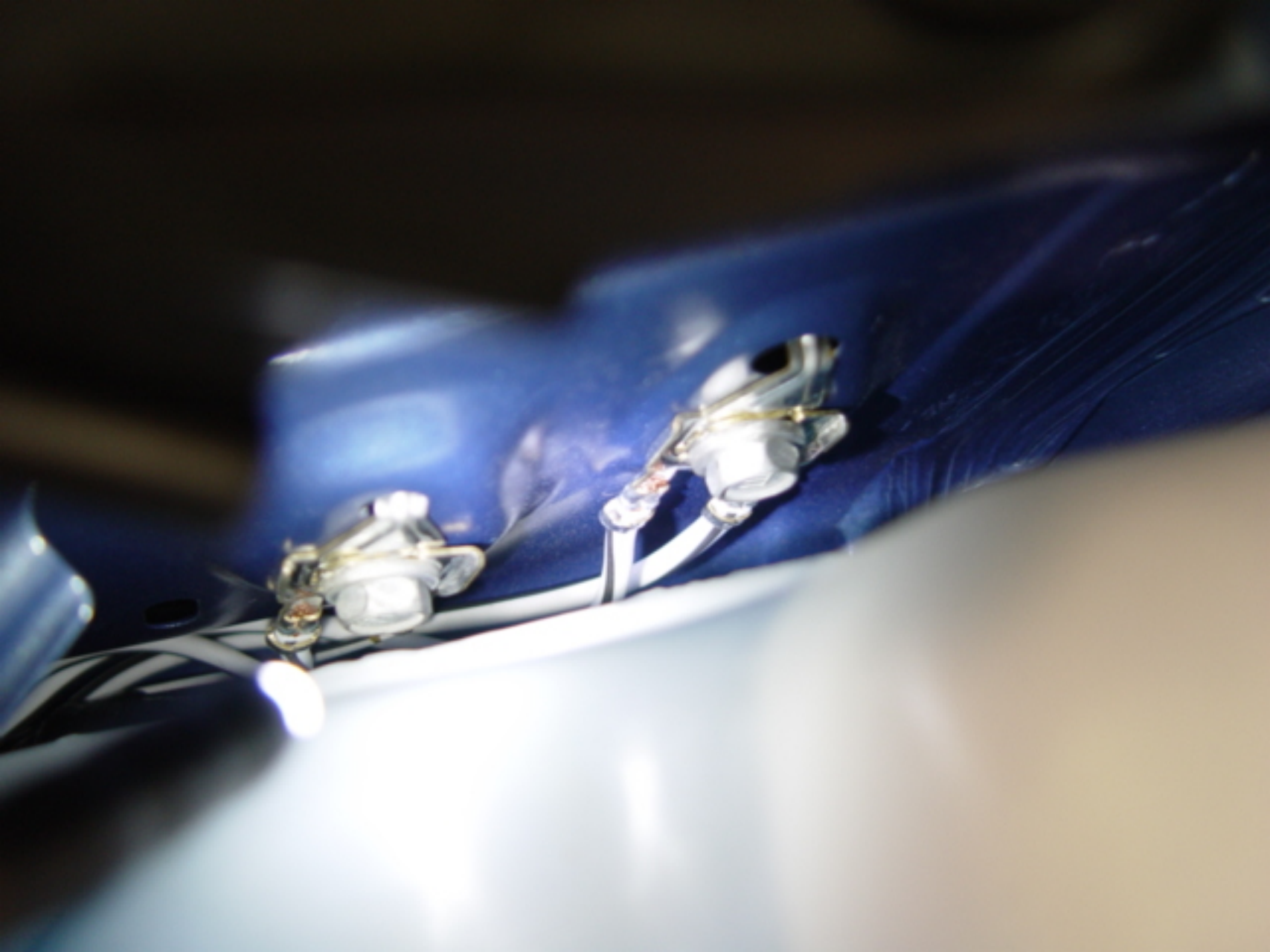


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